Cottam Solar Project

Applicant's Responses to Deadline 2 Submissions

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Cottam
SOLAR PROJECT

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Issue Sheet

Report Prepared for: Cottam Solar Project Ltd.
Examination Deadline 3

Applicant's Responses to Deadline 2 Submissions

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1 Introduction

1.1.1 This report provides the Applicant's responses to matters raised in submissions made at Deadline 2 on 21 November 2023.

1.1.2 Section 2 of this report provides the Applicant's comments on responses to the Examining Authority's (ExA) first written questions, issued on 31 October 2023 [PD-011]. The structure of the first written question is maintained, with comments grouped within the following topics:

- The draft Development Consent Order and other consents
- General and cross-topic matters
- The need case, electricity generated and climate change
- Other projects and cumulative effects
- Landscape and visual, glint and glare, good design
- Biodiversity and the Habitats Regulations Assessment
- The water environment
- Soils and agriculture
- The historic environment
- Transport and access, highways and public rights of way
- Noise, vibration, air quality, and nuisance
- Socio-economics, tourism, and recreation
- Other planning matters
- Compulsory Acquisition and related matters

1.1.3 Section 3 provides comments from the Applicant on other submissions made at Deadline 2.

2 Applicant's Comments on Responses to the ExA's First Written Questions

2.1 The Draft Development Consent Order and Other Consents

ExQ	Respondent	Question	Response	Applicant's Comment
1. The draft Development Consent Order and other consents				
1.1.23	Cadent Gas Limited	Please provide an update on discussions regarding protective provisions, identifying any outstanding areas of disagreement,	Please refer to document [REP2-081] for the full text of the response.	Protective provisions for the benefit of Cadent Gas Limited are included in Part 6 of Schedule 16 of the draft DCO (C3.1_E Draft Development Consent Order Version E [EN010133/EX3/C3.1_E] (Version E provided at Deadline 3)). Discussions are ongoing with Cadent Gas Limited in respect of the form of protective provisions and associated side agreement and the Applicant remains confident that agreement will be reached prior to the end of the Examination.
2. General and cross-topic matters				
1.2.3	West Lindsey District Council (WLDC)	Please provide your views on the compliance of the Proposed Development with the Central Lincolnshire Local Plan (2023).	Please refer to document [REP2-076] for the full text of the response.	The Applicant's assessment of the Scheme's compliance with policies set out in the 2023 Central Lincolnshire Local Plan (CLLP) is set out within Appendix 4 of C7.5_B Planning Statement [REP2-028]. Residual adverse effects from the Scheme are summarised and appraised in Section 6 of C7.5_B Planning Statement [REP2-028], and have been considered in the planning balance against the benefits of the Scheme in Section 7.

ExQ	Respondent	Question	Response	Applicant's Comment
1.2.4	Lincolnshire County Council	Please explain the inclusion of Policies DM1, DM4, DM6 and DM12 in paragraph 4.19 of the Local Impact Report (LIR) [REP-085] as these appear to relate to the types of development which that plan is concerned with, i.e. minerals and waste, rather than other forms of development.	Whilst these policies are from the Minerals and Waste Local Plan and are not directly related to solar it is considered that as they have recently been through a Local Plan examination and confirmed by a Planning Inspector as being in conformity with the NPPF they do offer some value in respect of the criteria that needs to be taken into account when assessing developments as being sustainable, affecting the Historic Environment, Impacts on Landscape and Best and Most Versatile Agricultural Land. With the Government proposal for reviewing Local Plans preparation procedures with the use of generic Development Management policies in all Development Plan documents it does demonstrate that it is appropriate to give weight to the Development Management policies of a Local Plan that is in conformity with the NPPF even if it has not been prepared for the particular development being considered as they do offer versatility.	The Applicant considers that policies DM1, DM4, DM6 and DM12 have very limited weight in the determination of the application as they do not relate to the type of development proposed within the Scheme. The factors that are considered by CLLP Policy S14 are assessed within the ES or addressed within other submission documents. The Applicant considers that the Scheme represents an efficient use of land. Please see response reference IPC-02 within C8.1.17 The Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 1 [REP2-048]. The impacts of the panels and associated infrastructure, including impacts on views and visual amenity, have been assessed within C6.2.8_A ES Chapter 8 Landscape and Visual Impact Revision A [REP2-008]. The impacts of the scheme on heritage assets, including Thorpe medieval settlement, have been assessed within C6.2.13 ES Chapter 13_Cultural Heritage [APP-048]. CLLP Policy S54 requires adverse health impacts to be addressed and mitigated.

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				The Scheme's impacts on human health have been considered within C6.2.21 ES Chapter 21_Other Environmental Matters [APP-056]. The Scheme's impacts on recreation has been assessed within C6.2.18 ES Chapter 18 Socio-Economics Tourism and Recreation [APP-053].
1.2.5	Nottinghamshire County Council	Please explain the inclusion of Policies SO2, SO3, SO4, SO5 and WCS1 in paragraph 2.68 of the LIR [REP-086] as these appear to relate to the types of development which that plan is concerned with, i.e. waste, rather than other forms of development?	The County Council agree with the Inspector that Policies SO2, SO3, SO4, SO5 and WCS1 referenced in the LIR relates to waste development and so are not relevant for consideration. The policies from the Waste Core Strategy that are relevant include Policy WCS2: Waste awareness, prevention and re-use and Policy WCS10: Safeguarding waste management sites and should have been referenced in the LIR.	The Applicant agrees with the Examining Authority and Nottinghamshire County Council that Policies SO2, SO3, SO4, SO5 and WCS1 referenced in the LIR relate to waste development and so are not relevant for consideration in respect of the Scheme. Policy WCS2 is considered to be relevant and will be added to Appendix 4 in the next version of the Planning Statement submitted into the Examination. Policy WCS10 is not considered to be relevant as it relates to safeguarding of waste sites from other types of development. The Scheme is not located on any allocated waste safeguarding sites, and is therefore not considered further.

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1.2.6	West Lindsey District Council (WLDC)	With regard to paragraphs 4.13 and 4.14 of the Council's LIR [REP-091], please specify the policies of the Neighbourhood Plans which the Council considers are of relevance?	The relevant adopted and/or emerging Neighbourhood Plans that are either within or near to (within 1km) the Cottam Solar Project are: • Corringham; • Sturton by Stow; • Blyton; • Ingham; • Laughton; and • Upton and Kexby. The Corringham Neighbourhood Plan was adopted on 24 January 2022. The relevant policies are listed below: • CNP5: Local character and the design of new development; • CNP7: Designated heritage assets; • CNP8: Protecting and enhancing non-designated heritage assets; • CNP9: Protecting and enhancing archaeological sites; • CNP12: Development in the countryside;	*Corringham Neighbourhood Plan (CNP)* CNP Policies: CNP5, CNP7, CNP9, CNP12 and CNP13 have been addressed in Appendix 4 of the Planning Statement [REP2-028] submitted at Deadline 2. Policy CNP8 is considered to be relevant and is assessed in Appendix 4 of the Planning Statement [EN010133/EX3/C7.5_C]. Policy CNP16 requires 'a transport statement or assessment which sets out details of the transport issues relating to the development, including appropriate mitigation measures' and states that 'proposals should protect existing Public Rights of Way and the network of rural lanes'. The Application is accompanied by a Transport Assessment [REP2-014] as well as a Construction Traffic Management Plan [EN010133/EX3/C6.3.14.2_C] and a Public Rights of Way Management Plan [REP2-018]. *The Sturton by Stow and Stow Neighbourhood Plan (SSSNP)* SSNP Policies: 1, 5, 6, 11, 12, 13 and 15 have been addressed in Appendix 4 of the Planning Statement [REP2-028] submitted at Deadline 2.

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			• CNP13: Nature conservation and biodiversity; and • CNP 16: Transport and Active Travel (Rural Lanes). The Corringham policies can be found in full at Appendix A of this document. The Sturton by Stow and Stow Neighbourhood Plan was adopted on 4 July 2022. The relevant policies are listed below: • Policy 1: Sustainable Development; • Policy 5: Delivering Good Design; • Policy 6: Historic Environment; • Policy 8: Community Facilities (impacted by access and Order Limits); • Policy 11: Green Infrastructure; • Policy 12: Environmental Protection; • Policy 13: Flood Risk; and • Policy 15: Walking and Cycling. The Sturton by Stow and Stow policies can be found in full at Appendix B of this document. There are also several emerging neighbourhood plans which have been	Policy 8: Community Facilities is not considered to be a relevant policy as the Scheme does not involve the loss or change of use of a community facility as identified in Part 1 of Policy 8. *Emerging Neighbourhood Plans (ENP)* Blyton, Ingham, Laughton and Upton and Kexby ENPs are at early stages of preparation and there are no policy documents to view as of yet, As such, the Neighbourhood Plan designated areas are given no weight at this stage.

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			designated, but at present have not drafted specific policies. Those areas which are impacted by the Cottam Solar Project include: • Blyton (designated 10 August 2022); • Ingham (designated 8 February 2017); • Laughton (designated 14 March 2016); and • Upton and Kexby (designated 14 November 2019).	
1.2.9	7000 Acres	Where in Section 21 of your Relevant Representation (RR) [RR-041] you refer to a failure to consider Neighbourhood Plans, can you please explain this in this in the context of Appendix 4 of the revised Planning	REP 047 Appendix 4 provides a detailed cross-referencing exercise but does not address the fundamentals of the planning requirements and objectives that have been set out at a high-level, covering themes of economic development, particularly in the Central Lincolnshire Local Plan (CLLP) (April 2023) and the Local Industrial Strategy (LIS) (2021). The LIS is not considered at all in REP 047. Extensive large-scale solar would undermine regional objectives for the agrifood and visitor sectors. With regard to renewable energy, the key areas of focus for the region are the stated as being the development of offshore wind, as well as carbon capture and storage to support	Please refer to document C8.1.18 The Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 2 [REP2-050] on this matter.

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		Statement [REP-047].	decarbonisation of gas infrastructure. These have been described in more detail in REP 118, Section 6.	
1.2.13	7000 Acres	Why does the Applicant consider that National Policy Statement (NPS) EN-3 is important and relevant to the determination of the application as solar generation is not covered by that NPS (see paragraph 5.4.9 of the revised Planning Statement [REP-047]). Please refer to the findings of the Examining Authority's Recommendation Report into the Little Crow Solar	The 7000 Acres Group does not consider the (NPS) EN-3 is relevant to the Application. In the Applicant's Planning Statement [Rep-047] they state at (5.4.9) 'The Energy NPSs were prepared specifically to address the particular balance of impacts and benefits likely to emerge from energy projects that are of such a scale that their contribution to meeting the government's energy objectives is of national significance. As such, the Applicant considers NPS EN-1, NPS EN-3 and NPS EN-5 to be important and relevant to the determination of the Application, and to form the primary decision-making framework for the Scheme.' The 7000 Acres Group disagrees with the Applicants assertions here. Please see the 7000 Acres Group WR [REP-117] for information examining how the Cottam Solar Project does not meet national needs and therefore is not of national significance.	The Applicant respectively disagrees and does consider that the Scheme meets national needs. 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 November 2023. Figure 7.2 of document C7.11 Statement of Need [APP-350] shows National Grid Electricity System Operator's projections for the future installed capacity of different electricity generation technologies in Net-Zero consistent scenarios. In all scenarios, solar is required to make a significant contribution to the future generation mix. In regard to national Significance Paragraph 5.2.2 of the C7.5_A Planning Statement [REP2-028] outlines that the Scheme is defined as an NSIP under Sections 14(1)(a), 15(1) and 15(2) of the

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		Park and Longfield Solar Farm projects and the Secretary of State's Decision Letters in that regard.		Planning Act 2008. The application of the NSIP regime is based on a generating station's capacity. Section 3.1 of C7.11 Statement of Need [APP-350] describes the assessment basis provided by the existing NPSs and their draft Revisions. Paragraph 3.1.1 of C7.11 Statement of Need [APP-350] describes that "Where developments do not fall within the scope of those NPSs (such as for solar), then they will be an important and relevant consideration pursuant to Section 105 of the Planning Act 2008."
1.2.21	West Lindsey District Council (WLDC)	Do the host Local Planning Authorities agree with the identified cumulative developments assessed within each aspect chapter? If not, can they identify which cumulative developments have been omitted from	WLDC notes that there have been new cumulative projects that have progressed since the submission of the Cottam Solar Project application. Clarification on the information relating to the Tillbridge project would be welcomed. Whilst Tillbridge is referred to in the majority of ES chapters, there does not appear to be any substantive cumulative assessment other than in the landscape and visual assessment. It is understood that at the time the ES for Cottam was produced at a time when there was limited information on the Tillbridge	As new information regarding other schemes is published, including the PEIR for Tillbridge and scoping reports for Great North Road and One Earth Solar, the cumulative effects are reviewed and updates are made to the C8.1.8_B Joint Report on Interrelationships Revision B [EN010133/EX3/C8.1.8_B]. The scoping report for the proposed solar development on land at Stow Park has recently been published and is being reviewed by the Applicant. A preliminary view in respect of cultural heritage is that no changes to significant cumulative effects have been identified for the Scheme.

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		which assessments and explain why they consider that they should be included.	scheme; however, the Preliminary Environmental Information Report (PIER) has now been published in April 2023. WLDC therefore believe it is prudent for further assessment to be produced in accordance with paragraph 3.4.9 of PINS Advice Note 17, which states "*where new 'other existing development and/or approved development' comes forward following the stated assessment cut-off date, the Examining Authority may request additional information during the examination in relation to effects arising from such development. The applicant should be aware of the potential need to conduct additional assessments to reduce delays and questions during examination*". In addition to Tillbridge, a Scoping Opinion was published on 13/11/2023 for the One Earth Solar Farm, which is located within the boundaries of West Lindsey. There is also a significant amount of information available on the One Earth website as part of the Phase 1 Consultation which took place from 27 September to 8 November 2023. It is therefore considered that, as a minimum, this development	

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			should be referred to in the cumulative assessment. Lastly, Stow Park Solar Farm submitted an EIA Screening request in June 2023 and has subsequently been determined by WLDC as EIA development. Stow Park is situated approximately 720m from the Cottam development. As a result, WLDC feel this should be included within the cumulative effects assessment.	
1.2.21	Lincolnshire County Council	Do the host Local Planning Authorities agree with the identified cumulative developments assessed within each aspect chapter? If not, can they identify which cumulative developments have been omitted from which assessments and	Yes but this is evolving with other solar NSIP schemes emerging in this area.	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 position is being kept under review and will be amended as required through the future updates to C8.1.8_B Joint Report on Interrelationships Revision B [EN010133/EX3/C8.1.8_B].

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		explain why they consider that they should be included.		
1.2.21	Nottinghamshire County Council	Do the host Local Planning Authorities agree with the identified cumulative developments assessed within each aspect chapter? If not, can they identify which cumulative developments have been omitted from which assessments and explain why they consider that they should be included.	In the time available to prepare this response, Nottinghamshire County Council has not had time to examine all the identified cumulative developments listed in each aspect chapter but if this has been restricted to other solar farm developments at or approaching examination stage, then it is omitting several emerging proposals of major significance. The following developments within Nottinghamshire should be considered for inclusion: a) The proposed STEP project at West Burton Power Station Finding STEP a Home b) The Steeples Renewables Solar Project The Site | Steeple Renewables Project c) The North Humber - High Marnham project North Humber High Marnham d) One Earth Solar Farm Home - One Earth Solar Farm	See Applicant's comment to 1.2.21 – Lincolnshire County Council above.

ExQ	Respondent	Question	Response	Applicant's Comment
			e) Great North Road Solar Farm GNR Solar Park	
1.1.24	7000 Acres	Please comment on the concerns raised by EDF Energy (Thermal Generation) Limited in its Written Representation (WR) (paragraph 3.3 and 3.4) [REP-092] that the cable route poses a risk to the regeneration of the Cottam Power Station site and its proposed additional requirement.'	Please refer to document [REP2-094] for the full text of the response,	The Applicant disagrees with 7000 Acres suggestion that the need for the change application indicates the Applicant has not carried out meaningful engagement. Changes 1 and 2 of the Change Application are a direct result of ongoing engagement between the Applicant and EDF. Please see the Applicant's response to the ExA for this question within document C8.1.15 Applicant Response to ExA First Written Questions [REP2-034]
1.2.27	7000 Acres	Please can the Applicant explain what factors will be used to	7000Acres have assessed that the yield of a fixed panel within the region would deliver around 10.8% of rated capacity, using data from Global Solar Atlas.	Please see the Applicant's response to the ExA for this question within document C8.1.15 Applicant Response to ExA First Written Questions [REP2-034].

<table>
<tr><th>ExQ</th><th>Respondent</th><th>Question</th><th>Response</th><th>Applicant's Comment</th></tr>
<tr><td></td><td></td><td>determine whether tracking or fixed structures will be used and what effect a decision to opt for fixed or mounting structures would have on the overall generating capacity of the Proposed Development.

Please can the Applicant also provide a comparison of hourly projections showing the likely energy output throughout the day/year for both fixed and tracking panels.</td><td>Within the ES the Applicant has stated that the tracker panels could increase the output of the scheme by between 10% - 30%. Taking 20% as a mid-point between the 10% to 30% range, 7000Acres would expect the yield to increase to 12.9%.

The recently approved Longfield Solar scheme is further south in the UK, and has a higher locational solar gain than the Cottam site by c. 7.5%. However even this is significantly lower than the yield from countries more suited to solar power. It is perhaps to be expected that the largest solar plant in Europe is in southern Spain.

<table><tr><th></th><th>kWh/m2</th><th>MWh/yr</th><th>Load Factor</th></tr><tr><td>UK Average (fixed)</td><td></td><td></td><td>10.5%</td></tr><tr><td>Cottam (fixed)</td><td>1168</td><td>945</td><td>10.8%</td></tr><tr><td>Longfield (fixed)</td><td>1246</td><td>1014</td><td>11.6%</td></tr><tr><td>Cottam (tracker)</td><td></td><td>1134*</td><td>12.9%</td></tr><tr><td>Extremadura/Spain (fixed)</td><td></td><td>1653</td><td>18.9%</td></tr><tr><td>Extremadura/Spain (tracker)</td><td></td><td>1983*</td><td>22.6%</td></tr></table>*Calculated from (fixed) data + 20% (mid point of 10-30%)

The above shows the relatively minor advantage the Cottam site has over the UK average yield, and the larger advantage of Longfield has as a location for solar in the UK, thus showing the importance of locational factors in site selection. More starkly, all UK installations have much</td><td>Factors for design

Solar yield at a Single Access Tracking scheme is higher than the yield at a FSF scheme, due to the higher load factor at the panel partially offset by a greater area of land required per installed MW. If consented, the Applicant will develop a detailed design which optimises the generation from the scheme over its operational life through the appropriate choice of panels subject to the parameters agreed within the DCO. Factors which may affect the layout of panels include landscape and visual impact, cultural heritage and glint and glare.

Benefit of solar in the UK at local load factor levels

7000 Acres have provided an analysis of solar performance outside of the UK. The Applicant agrees that solar schemes in e.g. Spain have higher load factors than solar schemes in the UK, but that is not a material consideration for this examination. Spanish schemes do not contribute to UK security of supply and do not bring a direct decarbonisation benefit to the UK.</td></tr>
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ExQ	Respondent	Question	Response	Applicant's Comment
			reduced outputs in comparison to (for instance) the Núñez de Balboa plant in Extremadura, Spain, which produces 82% more power than an equivalent capacity scheme in the UK. While the deployment of Tracking panels at Cottam raises the yield to above that of a fixed panel at Longfield, it does not approach that of Spain, and effectively secures the same solar gain as locating the panels on the Isle of Wight, but only at the cost of significantly increasing the height of the installation and its impacts. The Applicant is unclear as to whether tracking panes will be deployed at the Cottam scheme, and seeks to reserve the option for their use. The Applicant's ES describes the difference between fixed panels at a maximum of 3.5m height and tracker panels having a height of 4.5m. This is clearly a material difference to the visual impact of the scheme and the capacity of natural screening to be effectively deployed. The Applicant asserted that the scheme would have a higher load factor than other schemes brought forward to date, but this would clearly only be the case should tracker panels be deployed, which would have a	Section 3.3 of C7.11 Statement of Need [APP-350] describes Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". Figure 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 Government's projections are that it will remain cheaper in the future, at the load factors anticipated to be achieved at the scheme. Figure 7.2 of C7.11 Statement of Need [APP-350] illustrates the significant capacity of solar (and other low-carbon) generation required to support the UK's journey to a carbon-free electricity grid by 2035 and net zero by 2050. 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. Chapter 9 of C7.11 Statement of Need [APP-350] concludes on the

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			significantly adverse impact on landscape and visual aspect. Overall, therefore, the site for the Cottam project has a demonstrably low solar yield, and this fact must be given significant weight when considering the potential benefits it may deliver, and therefore the potential harms the scheme may be able to overcome. Attempts to increase the yield through use of tracking panels will also increase panel height, and also, therefore the potential adverse impacts arising from the installation.	suitability of the location in relation to the available grid connection at Cottam substation. 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, and that includes available connection at Cottam substation. There may be good reasons why additional schemes at other substations are not being brought forwards (e.g. there is no additional connection capacity, or available land). Landscape and visual impacts have been summarised in C8.2.2_A Supplementary Visual Effects Tables Revision A [REP2-052] and have taken into account the height of the tracker panels.
1.2.28	West Lindsey District Council (WLDC)	In its LIR [REP-091], WLDC raise concerns that the Proposed Development represents an inefficient use of land. However, the ExA notes that paragraph 5.5.6 of	Please refer to document [REP2-076] for the full text of the response.	Para 2.10.17 of EN-3 (November 2023) states *"Along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output. A typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. However, this will vary significantly depending on the site, with some being larger and some being smaller. This is also expected to change over time as the technology continues to evolve to become more efficient. Nevertheless, this scale of*

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		ES Chapter 5: Alternatives and Design [APP-040] indicates a ratio of around 3.7 acres (excluding landscape and mitigation) of land for each MW of output. Please provide further explanation as to why the council considers this would represent an inefficient use of land, in view of the estimated levels of land take required for solar generation referred to in paragraph 3.10.8 of dNPS EN-3.		*development will inevitably have impacts, particularly if sited in rural areas.*" Para 2.10.15 of EN-3 (November 2023) states; "*Solar farm proposals are currently likely to consist of solar panel arrays, mounting structures, piles, inverters, transformers and cables*". WLDC assert that the inclusion of cables and the grid connection must be included in the calculation for determining efficient land use. However, the wording of Para 2.10.17 of EN-3 does not specify that the main cable route is included in the 2-4 acres calculated for each MW output. Paragraph 2.10.15 mentions that a solar farm proposal is likely to include cables along with the solar arrays and other elements required to generate power. Cabling is an integral element within each solar array site connecting the panels to each other, transformers and inverters to enable electricity generation. The Applicant considers it is this cabling that paragraph 2.10.15 is referring to rather than the cable route which then transports the electricity from the substations on each Site to the grid connection point. Within the cable route corridor, the land will immediately revert to its previous use following the completion of construction of the underground

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				cable. Therefore, the Applicant does not consider it appropriate to include the cable route corridor land in a calculation to establish land use efficiency. In any case, Para 2.10.17 of EN-3 makes it clear that site size will "vary significantly depending on the site, with some being larger and some being smaller." In paragraph 5.5.6 of ES Chapter 5: Alternatives and Design [APP-040] the Applicant explains that during the early site selection stage, sites in the range of 75ha to 100ha per 50MW of power to be generated, plus 10% were sought. This equates to a range of 3.7 acres to 4.9 acres per MW. For the Scheme an initial site area of 1300ha was therefore sought. Identification of a larger site than ultimately needed, allows scope to refine the site area downwards as the Scheme evolves having regard to detailed constraints. In this case, the final site area was reduced to 1188.52ha including landscaping and ecological mitigation and enhancement. This equates to 4.89 acres per MW. When just the developable areas of solar panels and battery storage (which in the case of this site is

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				sizeable) are considered, the site area of 909ha equates to 3.7 acres per MW of power generated. This is within the 2-4 acre range set out within Para 2.10.17 of EN-3. The difference of circa 279ha between the overall site size of 1188.52ha and the developable area of 909ha, is primarily comprised of landscaping and ecological enhancement. For this particular Scheme, a significant biodiversity net gain of 96.09% in habitat, 70.22% gains in hedgerow and 10.69% gains in river units will be provided. See also the Applicant's responses to Written Representations Part 1 [REP2-048] (response refs WLDC-13 and WLDC16) which respond to the Council's assertion that there are wider impacts as a result of the Scheme's network of sites approach compared to a single site. There is no guarantee that a single site of the same scale would result in fewer impacts than the Scheme. The Site Selection Assessment [APP-067] identified other potential development areas, but none of these scored better than the application site in the RAG assessment that was undertaken (see Section 3 Assessment Results and Annex E: Potential Development Area Proformas). The

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				requirements for cabling and infrastructure for a single site and the resulting impacts would be dependent upon the unique location and context of the that site and the constraints that arise as a result. It is not therefore reasonable to conclude that a single site would obviously be better. Finally, NPS EN-1 paragraph 4.4.3 also emphasises that an application on one site should not be rejected simply because fewer adverse impacts would result from developing similar infrastructure on another site. The ExA should have regard to the possibility that all sites suitable for solar development may be necessary.
1.2.28	7000 Acres	In its LIR [REP-091], WLDC raise concerns that the Proposed Development represents an inefficient use of land. However, the ExA notes that paragraph 5.5.6 of ES Chapter 5: Alternatives and	There is a clear hierarchy for land use is explicit within the NPS suite, to first use previously developed land brownfield land contaminated land and industrial land. The NPS continues to state where the proposed use of agricultural land has been shown to be necessary… it may be used. The Applicant has not made use of any other land classes but agricultural land and not made a case for its use to be necessary. A further principle highlighted was that of "good design", which	See response to IPC-04 in [REP2-048] The Applicants Responses to Written Representations Part 1 and response 7A-17 in C8.1.2 in the Applicant's Responses to Relevant Representation [REP-049].

ExQ	Respondent	Question	Response	Applicant's Comment
		Design [APP-040] indicates a ratio of around 3.7 acres (excluding landscape and mitigation) of land for each MW of output. Please provide further explanation as to why the council considers this would represent an inefficient use of land, in view of the estimated levels of land take required for solar generation referred to in paragraph 3.10.8 of dNPS EN-3.	includes sensitivity to place and efficient land use. It should also be noted that the Government has committed to produce a Land Use Framework, having recognised the pressure the pressure on land from various demands – including decarbonization. It is also noted that the Draft EN3 considers temporary land use, and that inspectors have rejected the Lullington Solar project on the basis that 40 years is not considered to be temporary. This topic is described in more detail in REP 117, Section 1.	
3. The need case, electricity generated and climate change				

ExQ	Respondent	Question	Response	Applicant's Comment
1.3.1	West Lindsey District Council (WLDC)	The ExA notes that since the Applicant prepared its Statement of Need [APP-350], the Government has published its response to the consultation comments on the dNPS, updated the dNPS documents and published its blueprint for the future of energy in the UK 'Powering Up Britain' (all dated 30 March 2023). All IPs are invited to comment on the implications of these documents	WLDC does not consider that the policy framework has materially changed since the submission of the application. The dNPS documents have not progressed and have not been adopted by the UK Governments. The application still falls to be determined under section 105 of the Planning Act 2005, and WLDC has set out its view on the role of policy documents in the determination of the application.	The Applicant agrees that the DCO application for the Scheme will be determined under s105 of the Planning Act 2008. The updated NPS EN1, EN3 and EN5 were published on 22 November 2023 and laid before parliament. The NPSs are anticipated to be designated in early 2024. Section 1.6 of EN1 sets out the transitional provisions and states that for DCO applications submitted prior to the designation of the November 2023 NPSs (such as the Scheme), the 2011 suite of NPSs will continue to have effect. However, paragraph 1.6.3 states that the November 2023 NPSs are capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the Secretary of State. The Applicant's position is that the November 2023 NPSs and 'Powering Up Britain' are important and relevant considerations and should be given significant weight in light of the importance these documents place on the role of renewable energy in decarbonisation and achieving the Government's 2050 net zero obligations. These documents also reiterate the target of 70GW of ground and rooftop solar deployment by 2035.

ExQ	Respondent	Question	Response	Applicant's Comment
		on the Applicant's needs case.		
1.3.1	7000 Acres	The ExA notes that since the Applicant prepared its Statement of Need [APP-350], the Government has published its response to the consultation comments on the dNPS, updated the dNPS documents and published its blueprint for the future of energy in the UK 'Powering Up Britain' (all dated 30 March 2023). All IPs are invited to comment on the implications of	The 7000Acres WR [REP-117] describes, in Sections 1.2 and 1.3, the key points relating to the NPS landscape and Government strategy announcements that are most relevant to solar development, in particular: 1. Solar is not part of the of the UK Government's Ten Point decarbonisation plan. 2. The policy framework regarding solar has been a shifting landscape in recent years and continues to evolve. 3. While the ambition for solar development has grown to 70GW of capacity, there is no explicit target for large-scale ground-mounted solar development in the UK. 4. Significant challenges to large-scale ground-mounted solar development are acknowledged, including efficiency of land use, community impacts and environmental impacts. (None of these downsides arise for rooftop solar installations.) 5. Land use is increasingly recognised as being a key challenge and is subject to	See response to 1.3.1 – WLDC above. Government Support for ground-mount solar The Applicant responded to REP-117 in C8.1.18 The Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 2 [REP2-050], however notes in November 2023 new dNPS were published. Paragraph 2.10.10 of NPS EN-3, published November 2023 states that "*Solar also has an important role in delivering the government's goals for greater energy independence and the British Energy Security Strategy states that government expects a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW). It sets out that government is supportive of solar that is "co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use*"." (Applicant's emphasis). Accordingly, the Government does not expect rooftop solar alone to meet the national need for solar generation and as such the need for ground-mounted solar is confirmed.

ExQ	Respondent	Question	Response	Applicant's Comment
		these documents on the Applicant's needs case.	current Government work to develop a Land Use Framework. 6. The current NPS framework does not include solar. 7. The draft NPS framework (2023) does not foresee ground mounted solar of the scale proposed by CSP. 8. The NPS advocates "good design", including the importance of the functionality of the development. This WR will describe the constraints around the functional contribution solar can make to energy and decarbonisation, which are limited to the point where the benefits do not outweigh the harms arising from ground mounted solar installation at such a large scale. What is equally important to consider is the publication of three major reports this year that assess the decarbonization of the power sector in the UK and current progress towards delivering on that goal. In doing so, they describe the main challenges and the extent to which solar plays a role. These reports are:	26evelop The Applicant refers to its response to and 7A-169 in C8.1.18 The Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 2 [REP2-050]. Forward solar pipeline not sufficiently secure In relation to the need for large ground mounted solar schemes to come forwards, the Applicant notes that although lists and registers provide important evidence towards current and future generation capacities, the listing of a scheme on any grid connection register, a planning database or a commercial contract register, does not guarantee that the scheme will come forwards. For example, in February 2023 National Grid ESO shared their analysis that only 30-40% of projects listed on their Transmission Entry Capacity Register make it through to operation. Of the 205GW of projects of all technologies listed on the Renewable Energy Planning Database, just 50.1GW are operational and 42.1GW will not move forwards due to having been refused planning consent, being abandoned (by the developer), or planning permission having expired.

ExQ	Respondent	Question	Response	Applicant's Comment
			• Delivering a reliable decarbonised power system, by the UK Climate Change Committee (CCC), March 2023 • Decarbonising the power sector, by the National Audit Office (NAO), March 2023 • Decarbonisation of the power sector, by the Business, Energy and Industrial Strategy Committee (BEIS), April 2023 – Note: the energy portfolio of this department is now the responsibility of the Department for Energy and Net Zero (DESNZ) Their most pressing findings are: • The need for overall co-ordination and planning of the energy system • The resolution of grid connectivity issues – especially to deliver offshore wind generation • Inadequate pace of deployment of wind and nuclear power generation • The need to manage energy flexibility and intermittency of renewable energy sources While solar has its part to play, it features very little in the landscape of key challenges identified by these reports, that must be	Analysis of the CfD Register shows that even projects which have achieved consent and a revenue contract are not guaranteed to deliver. 43 projects with CfDs have registered a reduction to the capacity of the CfD Unit or have had their CfD terminated. Further, data from the Government's Microgeneration Certification Scheme shows that small-scale solar installations rose above 70MW per month in October 2022, from an average installation rate of just 30MW per month in the two years prior. For the Government's target of 70GW of operational solar by 2035 to be achieved by rooftop solar alone, microgeneration scheme installation rates would need to increase by more than 5-fold versus current already recorded installation rates. This increase would need to start immediately and be maintained throughout the next 11 years. It is the Applicant's view that relying on 11 consecutive years of record solar capacity installation, even if such a total capacity can be installed on rooftops, starting immediately in 2024, is not consistent with the Government's prudent approach to delivering the required capacity of solar in order to meet Net Zero. Flexibility and intermittency issues

ExQ	Respondent	Question	Response	Applicant's Comment
			overcome for the UK to make a success of decarbonising the power sector. Furthermore, existing rates of deployment quoted by the Climate Change Committee do not appear to be a concern, thereby undermining the call by Applicants for extensive acceleration of solar deployment through large-scale ground mounted solar.	The Applicant refers to its response to 7A-169 in C8.1.18 The Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 2 [REP2-050]. Deployment of wind and nuclear The Applicant refers to its response to CPC-05 of The Applicant's Responses to Relevant Representation [REP-049]. Figure 7.2 of C7.11 Statement of Need [APP-350] shows National Grid ESO projections for capacity of different low carbon technologies needed in the UK to keep us on track for a zero-carbon electricity system by 2035 (paragraph 8.9.3). National Grid ESOs projections include nuclear and wind technology (both onshore and offshore). Nuclear generation capacity is included in the blue sections of the columns in that figure and offshore wind is included in the green sections. The Figure shows that a very large capacity of low-carbon generation is needed in the UK to achieve net zero by 2050 and the majority of this capacity is needed by 2030. Any shortfall in the delivery of these capacities at a technology level will require an increase in

ExQ	Respondent	Question	Response	Applicant's Comment
				capacities of other technologies to fill the gap - else the achievement of Government's targets is at risk. Government is targeting 50GW of offshore wind by 2030 and up to 24GW of nuclear by 2050 and is aiming for up to 70GW of solar by 2035. Chapter 5 of C7.11 Statement of Need [APP-350] describes the risks to delivery of nuclear against the timescales required to support Governments 2035 and 2050 targets. The Applicant refers to Section 5.5 of C7.11 Statement of Need [APP-350] for the Applicant's submission on the ability of nuclear technology to contribute to Net Zero. Paragraph 7.4.11 of C7.11 Statement of Need [APP-350] also describes the risks associated with delivery of projects listed in industry pipelines, and this includes offshore wind projects. Paragraph 5.1 of C7.11 Statement of Need [APP-350] describes that it is for industry to come forward with projects within Government's strategic framework. Therefore if, as the representation states, the pace of development of nuclear and offshore wind is inadequate, then: 1. inadequate pace of other technologies increases the need and urgency

ExQ	Respondent	Question	Response	Applicant's Comment
				for other forms of generation to compensate for this inadequacy, and 2. it is for industry to come forward with projects to meet the need. This context further supports the urgent need for the scheme and for large-scale solar generally, because of the conclusions drawn in C7.11 C7.11 Statement of Need [APP-350]. The Applicant is bringing forward a solar plus storage scheme to contribute to the achievement of Government's net zero targets.
1.3.1	MJ Dover	The ExA notes that since the Applicant prepared its Statement of Need [APP-350], the Government has published its response to the consultation comments on the dNPS, updated the dNPS documents and	Much has happened since the "Powering Up Britain" document was written, the nation has had at least three Prime Ministers & three Secretary of State for Energy & Net Zero. The price of energy to consumers has reached record financially prices, the Government has had to increase the national debt attempting to bail out households, there is a new phrase replacing the much mooted "Energy Security" and that is "Energy Poverty", yet his document shouts about "Cheap" & "Clean" energy. This month the Government announced increased subsidy payments for off shore Wind Turbine, Solar too have I be liege had an	Solar in the Contracts for Difference Scheme In Contracts for Difference (CfD) Allocation Round (AR) 4, over 2.2GW of solar capacity across 66 projects (commencing in 2023/24 or 2024/25) secured CfDs at an initial strike price of £45.99 (2012 indexation, estimated to be equivalent to £61.81 in 2023 money) In AR5, over 1.9GW of solar capacity across 56 projects (commencing between 2025 and 2028) secured CfDs at an initial strike price of £47.00 (2012 indexation, estimated to be equivalent to £63.17 in 2023 money) Figure 10.4 of C7.11 Statement of Need [APP-350] shows that on a levelized cost of energy basis,

ExQ	Respondent	Question	Response	Applicant's Comment
		published its blueprint for the future of energy in the UK 'Powering Up Britain' (all dated 30 March 2023). All IPs are invited to comment on the implications of these documents on the Applicant's needs case.	announced subsidy lift. The cheap energy that has been promised has not been delivered, The last round of bids for wind farm licences realised a nil take up, the wind farm developers had asked for increased subsidies, which the Government then would not offer. So Developers used a tactical move by mutual agreement it seems, to force the Government to agree to enhanced payments, by steadfastly refusing to build more off shore Wind Turbines. So this month the Government awarded a circa 66% increase (index linked) increase in CfD subsidies. I believe the cost of CfD off shore wind turbine is circa £171 per MW as opposed to gas at circa £80 per MW prior to green levy. The consumer is now locked into contracts that cost over double the cost of efficient, reliable, gas turbine generation. Solar too I believe has been awarded a CfD subsidy uplift in the region of 32% I cannot fathom how Renewable Energy will, as the document suggests be Cheaper. " Cleaner" another phantom claim, a cursory look at the Country of Manufacture of the Equipment particularly Solar Panels, Batteries but also wind turbines, reveals that the majority of energy generation is achieved by burning	large scale solar is already cheaper than offshore wind, and Government's projections are that it will remain cheaper in the future. In particular Figure 10.4 of C7.11 Statement of Need [APP-350] shows that on a levelised cost basis, all forms of renewable generation in the UK are already cheaper and are projected to become cheaper still, than either abated or unabated gas fired generation. Unabated gas is not consistent with net zero policy The Applicant notes that 'efficient and reliable' gas turbines emit carbon at c. 350Kg/MWh and are therefore not consistent with zero-carbon emission operation of the national grid unless their emissions are removed, the technology for which is not yet in large-scale operation. Figure 10.1 of C7.11 Statement of Need [APP-350] illustrates how the deployment of low marginal-cost generation capacity will reduce the traded cost of electricity in the UK, benefitting consumers. The Climate Change ES Chapter [REP-014] has quantified the embodied CO_2e in the generation of

ExQ	Respondent	Question	Response	Applicant's Comment
			ever increasing quantities of coal, with planned coal fired power stations in production, China is responsible for almost one third of the CO2 Emissions globally, add to that the unsustainable mineral mining, including alleged exploitation of child miners in the Congo delving for toxic Lithium. Lakes of toxic poisonous brine in the refining stages and millions of tons of toxic tailings in the extraction of said minerals. Add to this the allegations of dubious labour regimes in the manufacture of panels. All this prior to shipping, delivery construction and we have yet to face the spectre of waste and disposal on a product that will be serviceable for between 10-15 years before replacement is required(and then on a steady decline from it's inefficient optimum). Recycling panels is extremely expensive, so many if not all will in all inevitably, end up in landfill. I know it's not clean. Opening comment was about reliance on Putins Russian Gas, but are we dashing headlong into reliance on China and US profit seekers albeit at a much higher price for our electricity and facing potential food price hikes as we source and import increased quantities of food to replace the farm produce we've sacrificed for Solar &	Solar Panels, Batteries, Cables and other equipment including shipping and road travel and accounted for replacement of panels and other parts. The assessment shows that the CO_2e produced during construction from the Scheme would be offset by the savings of energy generation within 4 years of operation. Food security Concerns relating to food security and land use have been responded to in C8.1.2 The Applicant's Responses to Relevant Representations [REP-049].

ExQ	Respondent	Question	Response	Applicant's Comment
			Wind. Businesses moving away from dirty energy sources has not proved cheap or effective in Port Talbot, The steel works there owned by TATA have been forced to shed circa 3000 jobs and cease smelting using the traditional blast furnace, it it to be replaced by an electric smelter, however that will smelt scrap metal for low quality steel products, it means high quality carbon steel can no longer be manufactured, steel for buildings, steel for ships etc. we must now import it from another BRICs country, nearer home Scunthorpe steel works is facing a similar fate or closure. Two small communities devastated the cost to the taxpayer is in the region of £5 million for Port Talbot alone. As a result of we are even more dependent on belligerent nations for our goods & services.	
1.3.1	Dorne Johnson	The ExA notes that since the Applicant prepared its Statement of Need [APP-350], the Government has published its	The implications of these documents give no justification to this application. To Power UP Britain as stated we need to expand our renewable energy on alternatives that offer a sustainable electricity production such as nuclear. Mini Nuclear reactors and wind. All of these take up far less land than solar and	Low / zero contribution of nuclear in 2020s Section 5.4 and Figure 5.4 of C7.11 Statement of Need [APP-350] provides evidence on the potential contribution of new nuclear generation in the UK, concluding that "nuclear will not be built out at the appropriate rate and scale so to allow it to continue to contribute a one-fifth share of GB demand through the 2020s and into the 2030s.

ExQ	Respondent	Question	Response	Applicant's Comment
		response to the consultation comments on the dNPS, updated the dNPS documents and published its blueprint for the future of energy in the UK 'Powering Up Britain' (all dated 30 March 2023). All IPs are invited to comment on the implications of these documents on the Applicant's needs case.	will produce the power when we most need it in winter. Solar is inefficient and does will not fulfil our need.	The scale of nuclear's contribution to decarbonisation beyond the 2030s is also currently uncertain, because currently only Hinkley Point C is a confirmed and funded development" Chapter 8 of C7.11 Statement of Need [APP-350] explains the contribution of solar generation to security of supply. Security of supply is important not only during winter peaks At page 116 of its 2023 Future Energy Scenarios document, National Grid confirm that security of supply *"refers to meeting all electricity demand at any given time"* and states that *"Traditionally, risks to meeting electricity security of supply, have been at times of high demand, particularly peak demand. In the future, these risks will also be driven by periods of over-supply and/or supply and demand mismatch."* Figure 8-2 of C7.11 Statement of Need [APP-350] presents the results of an analysis of future electricity demand and supply, and illustrates the importance of solar generation to meeting demand during summer months, when typically in the UK, demand is higher during daylight hours

ExQ	Respondent	Question	Response	Applicant's Comment
				(i.e. when solar generates) and when wind generation is seasonally lower. The Capacity Market, which is one of the UK's primary measures for delivering security of supply, applies a de-rating factor to contracts on a technology-by-technology basis. All technologies attract a de-rating factor, and all de-rating factors are below 1. This highlights that no single technology can be relied upon to deliver security of supply at all times (else it would have a de-rating factor of precisely 1). Critically, the de-rating factor for solar has nearly tripled over the period 2021 to 2027, demonstrating how quickly the market is moving away from traditional norms of supply risk at winter evening peak times only, and how important a multi-technology mix is to the achievement of security of supply for consumers at all times of the day and year. Solar is efficient in the UK Solar panels and electrical infrastructure have become larger and more efficient. Figure 10.2 of C7.11 Statement of Need [APP-350] shows that many solar cell cells are over 20% efficient and

ExQ	Respondent	Question	Response	Applicant's Comment
				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. 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 Government's projections are that it will remain cheaper in the future.
1.3.2	West Lindsey District Council (WLDC)	Please comment on the implications for the Government's Net Zero and climate change commitments should the Proposed	The pathway to the delivery of the Government's Net Zero and climate change commitments are set out the 'Net Zero Strategy: Build Back Greener (October 2021). The Net Zero Strategy requires a number of measures to be delivered across a range of sectors including domestic transport, industry, fuel supply, international aviation and shipping, waste and F-gases, power	Please see Applicant's response to 1.3.2 - Lincolnshire County Council below.

ExQ	Respondent	Question	Response	Applicant's Comment
		Development not be implemented.	generation, heat and buildings, agriculture and greenhouse gas removals. WLDC recognises that there is an urgent need to deliver low-carbon energy generation (involving a range of technologies). In the event that the Cottam Solar Project should not be implemented, in power generation terms another project, that demonstrates that it impacts are acceptable, would be required to come forward. WLDC is not aware of any evidence that suggests that other such projects will not come forward and there is no evidence that indicates that the Government's Net Zero and climate change commitments would not be met should the Cottam Solar Project not be implemented.	
1.3.2	Lincolnshire County Council	Please comment on the implications for the Government's Net Zero and climate change commitments	There is no shortage of proposals for solar so it is not a one-off opportunity to secure these benefits and given the cumulative effects make them unacceptable if all brought forward, not all should be consented and the ExA should be discerning about whether it is granted or not.	Future solar capacity needs Section 7.1 of C7.11 Statement of Need [APP-350] describes that, according to Government's Energy White Paper (2020), meeting a possible doubling of electricity demand by 2050 *"would require a four-fold increase in clean electricity generation with the*

ExQ	Respondent	Question	Response	Applicant's Comment
		should the Proposed Development not be implemented.		*decarbonisation of electricity increasingly underpinning the delivery of our Net Zero target."* The party is directed to response reference BLCP-03 within C8.1.17 The Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 1 [REP2-048]. Forward solar pipeline not sufficiently secure See also the Applicant's response to 7000 Acres written response in 1.3.1 above.
1.3.2	7000 Acres	Please comment on the implications for the Government's Net Zero and climate change commitments should the Proposed Development not be implemented.	The key underlying point, should the proposed development not be implemented, is that there remains a clear path by which the UK Government can achieve its 70GW ambition for solar capacity. The 7000Acres WR [REP-117] describes in Section 3 the potential for rooftop solar to provide the predominant volume of capacity, through only considering a subset of domestic and commercial rooftops, as identified in reports by the UK Warehouse Association and Ecotricity. The WR also describes the volume of solar schemes that are either included in the UK Government's Renewable Energy Planning Database (REPD) or the National Grid TEC	The Applicant responded to REP-117 in C8.1.18 The Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 2 [REP2-050], Please see the Applicant's response to 1.3.1 – 7000 Acres and 1.3.2 -Lincolnshire County Council above The applicant described in Section 7.5 of C7.11 Statement of Need [APP-350] the critical factors of irradiation, availability of land and availability of grid connection when considering the location of large-scale ground mount solar schemes. The Applicant considers that the proposed location may be a high priority location under a national screening plan because the beneficial characteristics of the location are invariant.

ExQ	Respondent	Question	Response	Applicant's Comment
			register – which includes a queue of schemes with a combined capacity of over 130GW. Such a pipeline does not include any prospective rooftop solar, so it is clear that uncontrolled deployment of ground mounted solar would simply render rooftop solar unnecessary – leaving rooftop space unoccupied, and land consumed by solar which may well have been better used for other direct decarbonization measures or to meet other demands that similarly have no rooftop alternative, such as food production, housing, commercial development, reservoirs or recreation and green space. Not approving such large-scale schemes will have the effect of discouraging extremely large-scale ground mounted solar developments, and in so doing provide time for the evolution of greater coordination and planning of the energy system as well as greater certainty over the role land will play in the decarbonisation journey – including how the country would deliver the 30-70,000hectares of trees per year, called for by the UK Climate Change Committee. Crucially, the UK CCC report ("Delivering a reliable decarbonised power system, Climate	

ExQ	Respondent	Question	Response	Applicant's Comment
			Change Committee", March 2023) notes that build rates for solar remain "close to historical peak". It describes the estimated installation rates to meet the 70GW ambition by 2035 as requiring 4.3 GW per year of solar and "4.1 GW of solar having been achieved historically". The current economics of energy and solar panels is making rooftop solar an attractive proposition once again, after a lean period following the removal of Government support for installation of rooftop solar (see "Home solar panel installations fall by 94% as subsidies cut", Guardian article, 5 th June 2019). Rates of rooftop deployment are now rising again. Not approving the proposed development simply avoids a situation of committing to consent one of many developments that may only serve to use land inefficiently and be a cause for regret. Given that rates of solar deployment are already healthy, the Government ambition for 70GW of solar can be achieved without the need for such large-scale ground mounted solar schemes, or the associated increase in rate of solar	

ExQ	Respondent	Question	Response	Applicant's Comment
			deployment that is advocated by the Applicant.	
1.3.2	MJ Dover	Please comment on the implications for the Government's Net Zero and climate change commitments should the Proposed Development not be implemented.	If the development should not go ahead, the impact on the Government's net zero would be negligible, given the amount of subsidies paid to renewable companies because their energy production is available when least needed, leading to many having to go off line. I think the country should invest in a fleet of nuclear power stations for low carbon clean energy, reliant, cost effective and controllable, density of power & a much reduced footprint. Using solar and wind turbines backed up with closed and open circulating gas turbines for up to 60 years could stifle the development of nuclear power stations until well into the future. This will leave consumers with an expensive and inefficient energy supply, in addition to increased food prices	Payment of subsidies Currently, the majority of curtailment (referring to the IP's statement that "*energy production is available when least needed, leading to many having to go off line*") in the UK is experienced on the large-scale wind fleet. Much of this is due to transmission constraints, which occur when the electricity network linking the point of generation to the major points of consumption, does not have the capacity to transmit all of the generation at certain times, but in particular when generation output is high. Curtailment for network constraints currently results in a compensation to the asset operator for the electricity they could have generated but have not been able to transmit to market. In the 12 months starting 1st October 2022 and ending 30th September 2023, National Grid data records metered wind to be 63TWh. Constraints due to location totalled 3.3TWh (c.5% of net generation) and constraints due simply to there being 'too much wind energy on the system' totalled c.0.6TWh, or less than 1% of net generation.

ExQ	Respondent	Question	Response	Applicant's Comment
				Data from FES (2023) Table FL.18 shows that average curtailment in the years 2031 – 2040 may range from 31TWh ('Leading the Way') to 46.8TWh ('System Transformation') but a deeper dive into the data (via Table ES1 of the same report) shows that curtailment of solar generation is anticipated to be much lower, with an average annual curtailment 2031-2040 ranging from 2.4TWh - 2.7TWh. Curtailment in the UK is therefore currently more to do with where electricity is generated, than how much electricity is generated, and curtailment in the UK is anticipated to be associated more with wind generation than with solar generation. An asset located on a transmission network which is well connected to demand centres, is unlikely to be curtailed for the same reasons as the majority of current curtailment in the UK, however the possibility of curtailment for non-locational reasons remains. In such circumstances, curtailment would occur because more energy was being generated than that which could be consumed or stored at that time. Figure 10-2 of the Statement of Need [APP-350] shows that an excess of supply reduces market price, incentivising price-sensitive demand

ExQ	Respondent	Question	Response	Applicant's Comment
				to increase, or in extremis, incentivising supply to shut down so as to avoid having to pay (rather than be paid) to generate. Critically, neither of these outcomes results in a compensation payment from consumers to the asset operator for the electricity they have not generated. Chapter 9 of C7.11 Statement of Need [APP-350] describes that the Scheme proposes to connect to a well-connected section of the NETS which has available transmission capacity. As such, transmission constraints are unlikely to cause curtailment at the Scheme and as such, during its operational life, the Scheme is unlikely to receive compensatory payments for curtailments which would ultimately be funded by consumers. A growth in flexibility (including demand-side response, storage, interconnection and hydrogen) will help to minimise the curtailment in the future UK electricity system which may come with the build out of large capacities of renewable generation. But because renewable electricity is variable, the UK may not be able to meet demand at times of low renewable output without the build out of large capacities of renewable generation.

ExQ	Respondent	Question	Response	Applicant's Comment
				Low / zero contribution of nuclear in 2020s See also the Applicant's response on nuclear power in the response to Dorne Johnson for 1.3.1 above. Food security Concerns relating to food security has been responded to in C8.1.2 The Applicant's Responses to Relevant Representations [REP-049].
1.3.2	Dorne Johnson	Please comment on the implications for the Government's Net Zero and climate change commitments should the Proposed Development not be implemented.	Importing these panels from China, taking away thousands of acres of countryside and farmland is not really green and will have little effect on our carbon emissions. Solar should be on rooftops. If this development and others like it did not go ahead it would have little effect.	Brownfield and rooftop solar are unlikely to meet the need Please see the Applicant's response to FPM-22 in C8.1.2 The Applicant's Responses to Relevant Representations [REP-049] and 1.3.1 – 7000 Acres above. Carbon emissions Please see the Applicant's response to ENG-07 in in C8.1.2 The Applicant's Responses to Relevant Representations [REP-049].

ExQ	Respondent	Question	Response	Applicant's Comment
1.3.3	West Lindsey District Council (WLDC)	The ExA notes the Applicant's Statement of Need [APP-350] (paragraph 4.3.9) refers to the then unpublished 'Skidmore Review'. Following its publication on 13 January 2023 as 'Mission Zero Independent Review of Net Zero', please comment on any implications you consider this review may have in the consideration of the Proposed Development.	The Mission Zero Independent Review of Net Zero states that the Government should set up a taskforce and deployment roadmaps in 2023 for solar to reach up to 70GW by 2035. This includes a 'rooftop revolution'. Until the publication of the roadmaps, the strategy to deliver 70GW of solar energy generation is unknown. To achieve that installed capacity, WLDC considers that there is an onus on developers to promote projects that are well designed and ensure an efficient use of land to ensure that environmental and socio-economics are minimised whilst maximising the benefits of projects. Current Government UK solar installation is as of the end of September 2023 there is a total of 15.5 GW of solar capacity in the UK across 1,401,132 installations. This is an increase of 7.4% (1.1 GW) since September 2022. In absolute terms, this is the highest annual increase seen since May 2017. At the end of June 2023 (end Quarter 2), 51% of capacity (7,708 MW) came from ground-mounted or standalone solar installations.	Future need for solar Please see the Applicant's responses to 1.3.1 - 7000 Acres and 1.3.2 – Lincolnshire County Council above. Brownfield and rooftop solar are unlikely to meet the need See Applicant's response to Dorne Johnson on 1.3.2 above Efficient Use of Land The party is directed to response reference IPC-02 within C8.1.17 The Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 1 [REP2-048].

ExQ	Respondent	Question	Response	Applicant's Comment
			As outlined in the answer to question 1.2.28, if all future schemes followed the Cottam ratio of 0.5MW/ha then this would cover an area of approximately 140,000 ha (1,400 km2) of the UK, excluding cable corridor connection which is a vital element of a solar farm as set out in the dNPS EN-3. This is larger than the total area of West Lindsey which is approximately 115,600 ha (1,156 km^2). If Schemes where to follow the Gate Burton ratio of 0.81MW/ha then only 86,420 ha (864.2km2) would be required. Indeed the Longfield ratio was applied then only 63,636ha (636.4 km2) would be required to meet the 70GW national target.	
1.3.3	7000 Acres	The ExA notes the Applicant's Statement of Need [APP-350] (paragraph 4.3.9) refers to the then unpublished 'Skidmore Review'. Following its publication on 13	The 7000Acres WR [REP-117] describes in Section 1.4 the key points relating to the Skidmore Review that are most relevant to solar development. In summary these are that the "Skidmore Review": 1. Acknowledges the need for a "Mission for Rooftop Solar", 2. Recognises the increasing importance of managing land use as a part of decarbonisation – and the need for a clear	The Applicant provided a full response to REP-117 in answer to the ExA's First Written Questions Q1.3.5. This response is included from p75 of the Applicant's Deadline 2 Submission - C8.1.15 Applicant Response to ExA First Written Questions [REP2-050] See also the response made to West Lindsey District Council at point 1.3.3 above.

ExQ	Respondent	Question	Response	Applicant's Comment
		January 2023 as 'Mission Zero Independent Review of Net Zero', please comment on any implications you consider this review may have in the consideration of the Proposed Development.	plan on how we manage competing demands on land. 3. Asserts that near communities, solar should not be "imposed on communities", instead being consented through a process of Local Area Energy Planning. 4. Recognises the increasing importance of managing system flexibility – particularly in periods of low wind and solar. This topic is described in more detail in REP 117, Section 1.	
1.3.3	MJ Dover	The ExA notes the Applicant's Statement of Need [APP-350] (paragraph 4.3.9) refers to the then unpublished 'Skidmore Review'. Following its publication on 13 January 2023 as 'Mission Zero Independent	If the development(s) are permitted it will devastate the area for three or four generations, by which time it is very likely that this rural area will never be able to return to it's former state, it would be impossible to restore the landscape that has taken several millennia evolve, back to a pre solar norm. Communities would be splintered or non existent, as rural employment & opportunities are lost, pastoral care of parts of the countryside enclosing, surround by or merely adjacent to these sprawling industrialisations will cease,	The Applicant does not consider that the Scheme would result in 'devastation'. The Applicant refers to its responses to KPC-02, ELMP-01, BLCP-04 and ECO-24 in The Applicant's Responses to Relevant Representation [REP-049]. See also the response made to West Lindsey District Council at point 1.3.3 above.

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		Review of Net Zero', please comment on any implications you consider this review may have in the consideration of the Proposed Development.	current wildlife will be displaced or destroyed probably replaced by species of vermin. Homes will be monetarily devalued and less attractive to potential buyers (evidence of this is currently experienced) These sites are in all probability destined to become the brownfield site of the future. Enterprise zones perhaps, in vain effort to attract employers to help tackle the growing army of the unemployed in local townships, It will probably not be returned to farming, the farmers long gone, morphed into greedy landowners seeking the next stream of revenue from their post Solar bramble choked and compacted infertile land that's been starved of nutrients and care for six decades plus. Perhaps the socioeconomic benefits will be realised in the City on stock markets dealing in the Energy sector, certainly the overseas investors will benefit from the high costs of renewable energy, the landowners too will reap the benefits of rental. The initial flurry of promised well paid jobs in the "Renewables" industry here will mainly be contracted staff brought into the area for construction, for the operational phase, very few will be required for operation and even that will in all probability	

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			be contractual as opposed to local. This is an NSIP, one of potentially 5 in our area, but those that benefit the most don't live here,(other than the avarice affected farmers) they live in USA, in London, in China, in Canada, Bankers, Investors, Lawyers, Advisors. Chris Skidmore asks for net zero communities, with net zero homes, but none of the new housing being built have solar panels fitted to help with energy/ carbon offsetting. Why? How will the existing housing stock be brought up to date in a net zero world, who will finance the transition, insulate and innovate, particularly in difficult Financial conditions and living in an economically depressed area. But how will this dependency on inefficient & intermittent solar & wind, Most of which is manufactured by a belligerent nation, a nation that controls circa 90% of rare earth & mineral mining & processing a nation that has recently placed export controls on Germanium & Gallium, both vital in the production of semiconductors. China has the monopoly in Solar wafer processing and panel manufacture, China manufactures and supplies a high volume of wing turbine gearboxes and blades. The UK is rapidly	

ExQ	Respondent	Question	Response	Applicant's Comment
			becoming dependant, Food, Energy means, Steel, etc. are we swapping one belligerent nation for another.	
1.3.3	Dorne Johnson	The ExA notes the Applicant's Statement of Need [APP-350] (paragraph 4.3.9) refers to the then unpublished 'Skidmore Review'. Following its publication on 13 January 2023 as 'Mission Zero Independent Review of Net Zero', please comment on any implications you consider this review may have in the consideration of	I agree that renewables and net zero can help with economic growth. The U.K. should invest in new better technologies. However developments like this will give deprivation to local areas and will not help with our local or national economy.. Our local economy is based on agriculture.	The Applicant directs the commentor to Section 18.7 of C6.2.18 ES Chapter 18_Socio Economics Tourism and Recreation [APP-053] which identifies no adverse significant effects on deprivation as a result of the Scheme. Paragraphs 18.8.12-13 however assess that with enhancement measures as set out in C7.10 Skills Supply Chain and Employment Plan [APP-349] (as secured by Requirement 20 of C3.1_E Draft Development Consent Order Version E [EN010133/EX3/C3.1_E] (Version E provided at Deadline 3)), there are significant beneficial effects on access to employment, and to education and skills attainment as measured indices of deprivation as a result of the construction of the Scheme. Section 18.7 of C6.2.18 ES Chapter 18_Socio Economics Tourism and Recreation [APP-053] assesses the economic impact of the Scheme to the local and regional economy. At construction (para. 18.7.52) this is a minor (local) and negligible (regional) beneficial effect, during operation (para. 18.7.97) is a negligible (local and regional) beneficial effect, and decommissioning (para.

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		the Proposed Development.		18.7.135) is a minor (local) and negligible (regional) beneficial effect. Specific assessment of the impacts on the agricultural economy in the Local Impact Area from the Scheme has assessed no greater than a long-term minor adverse effect. This is not therefore a significant effect. See also the response made to West Lindsey District Council at point 1.3.3 above.
1.3.4	7000 Acres	7000 Acres state in its WR [REP-117] that there is no policy case for further development of large scale ground mounted solar. Please explain this statement in light of paragraph 3.3.58 of dNPS EN-1.	Probably the first observation with regard to the revised draft NPS-EN1 2023, versus the 2021 version is that the landscape is constantly evolving as we understand more about the urgency of climate change, what continues not to be done, and how we best decarbonize the electricity sector. Clearly, there is the relatively recent Government ambition for 70GW of solar (first published in 2022), but there is also the economic circumstance of high energy prices and low solar prices, coupled with the troubled economics of farming which makes the proposition of large-scale groundmounted solar financially lucrative.	Policy Support for Solar Powering Up Britain's Energy Security Plan (pp37-38) explicitly states that the Government is *"aiming for 70 gigawatts of ground and rooftop capacity together by 2035"* and because *"Ground-mounted solar is one of the cheapest forms of electricity generation and is readily deployable at scale. The Government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land"* (Applicant's emphasis: 'mainly' should not be misinterpreted as 'exclusively') Paragraphs 3.3.20 and 3.3.21 of the November 2023 NPS EN-1 establish the government's support

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			With investors keen to see bankable green investment opportunities, developers are keen to reinforce the message of "urgency" around deployment of large-scale ground mounted solar, in pursuit of their objectives to deliver such projects, regardless of whether their schemes are genuinely effective in terms of sustainability and decarbonization. For instance, Pinsent Masons act across all the live NSIP solar projects in West Lindsey, amongst many others, some of the partners involved in these schemes are also involved in lobbying the Government to influence the draft National Policy Statements, which goes some way to explain the incremental shift in the development of the draft NPS, i.e. there is clearly developer interest involved in the evolution of the draft NPS. While we may therefore congratulate the Applicant and their representatives on their work in influencing this latest draft, such lobbying does not occur in a vacuum. Around the same time as the draft NPS suite was being published, further reviews of the UK's progress towards decarbonization were published, notably the Skidmore Review	for solar and the need for sustained growth in capacity over the next decade. Paragraph 2.10.9 of the November 2023 NPS EN-3 also describes the Government's commitment to sustained growth in solar capacity and that solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector and delivering greater energy independence. Paragraph 2.10.10 confirms that *"government expects a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW)"*. Please also see the Applicant's comments on the Skidmore Review in 1.3.3 in C8.1.15 Applicant Response to ExA First Written Questions [REP2-034]. The case for ground mounted solar at the scale proposed Paragraph 2.10.54 of November 2023 NPS EN-3 confirms that the capacity threshold for NSIP projects is 50MW and therefore that the NPS is relevant for all projects which are greater than 50MW in capacity. Other than this de minimis level, the NPS does not suggest a maximum or typical size of scheme.

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			(above) and reports from the UK Climate Change Committee, the National Audit Office and the Business, Energy and Industrial Strategy (BEIS) Committee. The messages from all four reports are consistent, calling for greater coordination and planning of energy infrastructure, with priorities being for deployment of offshore wind and associated grid infrastructure, as well as technologies to manage energy flexibility that arise from intermittent renewable energy, specifically storage and clean dispatchable power generation. Across the four reports, the only clear action regarding solar is for a "rooftop solar revolution". In addition, there is an increasing level of understanding as to the important role that land use will play in decarbonization, and a growing call for efficient land use within a coordinated land-use framework. The Examining Authority may note that there has been the opportunity for comment on the draft NPS, and that the position taken by the developers in the hearings is that they are supportive of rooftop solar, in principle presumably, as long as they don't actually	Paragraph 2.10.17 refers to the size and scale of "typical 50MW solar farm". Within the context of the full paragraph it is clear that the intent of the language is to describe a range of possible and probable ('typical') layout of a 50MW solar farm, rather than describing that a 'typical' solar farm is 50MW, and therefore the Applicant disagrees with 7000 Acre's conclusion that "the case for ground mounted solar at the scale proposed by the Applicant remains flawed." Please also see the Applicant's comments on rooftop solar in the Applicant's response to paragraph 1.3.1 – 7000 Acres above. Concerns relating to land use has been responded to in C8.1.2 The Applicant's Responses to Relevant Representations [REP-049].

ExQ	Respondent	Question	Response	Applicant's Comment
			have to deliver any. What is clear is that, with 130GW of proposed ground-mounted solar schemes with connections in the National Grid TEC register, even if less than half of this is delivered, it will make redundant the need for rooftop solar development. It is therefore increasingly understandable that the developer calls for "urgency", to secure approvals of consents for their schemes before the policy and planning framework catches up and creates the much called-for coordination of energy projects and efficient land use protocols which would puth their schemes under much greater scrutiny. The draft NPS therefore simply captures a moment in time. For instance, it highlights the success of Contracts for Difference in delivering Offshore Wind, having been published before the outturn of the year's CfD round, in which the clearing price was too low to support any new offshore wind projects. With regard to the specific question around section 3.3.58, this must be read in conjunction with section 3.3.57, which lists a	

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			range of 12 technologies which are included in the scope of the NPS and which includes solar. While section 3.3.58 states that "the need for all these types of infrastructure… is urgent", in section 3.3.59, the dNPS states there is a "critical national priority (CNP) for the provision of… offshore wind infrastructure… and network infrastructure". This is the only technology to be highlighted in this way. This clearly reinforces a key finding of all four reviews referred to earlier, i.e. the need to accelerate offshore wind and supporting network infrastructure. Within the dNPS there is no differentiation between the other 11 technology types, despite their very different levels of potential contribution to energy, to decarbonization or their level of technology maturity. For instance, Hydrogen and CCS (Carbon Capture and Storage) are central to the Government's approach to delivering energy flexibility, but both technologies are in their infancy but are absolutely critical to the success of decarbonization. Wave and tidal technologies have always shown promise, but are not foreseen to make a significant	

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			contribution to the energy system, only between 1-4% by 2050, according to National Grid (FES 2023). For context, solar is expected to deliver between 7-10% of UK power by 2050, and wind is expected to deliver around 70%. In other words, while the blanket call is for "urgency", some technologies are clearly more valuable – and therefore urgent than others in the pursuit of decarbonization objectives. In terms of the overall policy case therefore, the inclusion of solar in the dNPS must be considered in the context of an evolving landscape of understanding, the outcomes of effective lobbying of developers with a strong financial incentive, as well as principles that have remained consistently throughout the evolution of NPS (including the dNPS) and strategy documents, in particular principles of "good design", which include efficient use of natural resources – including land use, development that is sensitive to place and the mitigation of adverse impacts. Overall, therefore, the case for ground mounted solar at the scale proposed by the Applicant remains flawed, as although the	

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			dNPS does include solar, which implies an installed capacity of over 50MW, dNPS EN-3 provides an example of a "typical" solar scheme being 50MW, not an order of magnitude larger. Furthermore, the growing concerns over effective land use weigh heavily against such schemes, particularly as uncontrolled development would serve to undermine the efficient deployment of solar on rooftops, which would far better meet the consistent principles of good design.	
4. Other projects and cumulative effects				
1.4.4	West Lindsey District Council (WLDC)	Paragraph 8.10.6 of ES Chapter 8: LVIA identifies the developments considered by the Applicant in its assessment of cumulative landscape and visual effects. Please explain how different combinations of these	WLDC maintain significant concerns regarding the approach to cumulative assessment. The concern relates not to outcomes of the applied methodology of assessing the scenarios of cumulative projects together being constructed either all at the same time or in sequence, but that there is no assessment of the potential combinations between the projects. WLDC considers it essential that the combinations of each cumulative project are understood and assessed so that that ExA and the Secretary of State can reach sound conclusion on NSIPs that are all being	A cumulative assessment is included within the LVIA ES Chapter 8 Landscape and Visual Impact Revision A [REP2-008] and findings are set out within the individual receptor sheets within ES Appendix 8.2 Potential Landscape effects Revision A [REP-020] and ES Appendix 8.3 Potential Visual Effects Revision A [REP2-012]. For proposed cumulative sites for Cottam 1, 2, 3a and 3b, please refer to LVIA ES Figure 8.15.1 [APP-290]. For proposed cumulative developments for Cottam 1, 2, 3a and 3b, please refer to LVIA ES Figure 8.15.2 [APP-294]. All cumulative sites and cumulative developments included within the cumulative assessment for

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		developments could result in greater effects to those identified by the Applicant in ES Chapter 8: LVIA [APP- 043].	examined at the same time and situated in the same locality. At present, the only cumulative scenario that can be considered for the purpose of decision making is one where all projects are consented. There is no assessment of how each combination of projects perform (e.g. 2 projects together) WLDC are concerned that, if all DCO applications are considered individually without proper regard to the cumulative impacts and/or only in a scenario where all cumulative projects are consented, they may all be considered acceptable as isolated schemes, but with no consideration of whether there is a 'tipping point' from acceptability into unacceptability. This approach to decision making is flawed as it would allow projects to progress that could have unacceptable cumulative impacts with each other. WLDC's strong view is that, in order for the decision maker to have adequate information before them to make a sound decision, a cumulative assessment that	Cottam 1, 2, 3a and 3b have been discussed and agreed with the consenting authorities, including Lincolnshire County Council and Nottinghamshire County Council. Please refer to the LVIA Workshops set out within ES Appendix 8.4 [APP-076]. The Applicant was informed by Lincolnshire County Council during these LVIA Workshops that a list of potential projects to be considered as part of the cumulative assessment had been forward to West Lindsey District Council (WLDC) who would be better placed to provide more detailed information. Feedback from WLDC was not received during the application process or as part of the LVIA Workshops. NCC provided final comment on the list on cumulative developments in their email 1 September 2022, but did not provide comment on the methodology or approach to the cumulative assessment. The cumulative assessment is undertaken in accordance with ES Appendix 8.1 LVIA Methodology [APP-068] which was agreed with Lincolnshire County Council and Nottinghamshire County Council.

ExQ	Respondent	Question	Response	Applicant's Comment
			addresses the following combinations should be provided as a minimum: • Cottam + Gate Burton • Cottam + West Burton • Cottam + Tillbridge • Cottam + Gate Burton + West Burton • Cottam + Gate Burton + Tillbridge • Cottam + West Burton + Tillbridge • Cottam + Gate Burton + West Burton + Tillbridge Unless such assessments are carried out, there is no ability for the decision maker to determine whether a combination of two projects could be acceptable cumulatively; they could only consider the total cumulative impacts of all projects that form the assessment. Should the cumulative impacts of all projects be concluded to be unacceptable, WLDC is unclear about how the decision maker determines which project(s) influence that unacceptable conclusion the greatest. WLDC are therefore concerned about whether the decision maker is able to conclude a single	With regard to the cumulative effects of the Scheme, the LVIA assesses the impacts of the Scheme alongside the proposed Gate Burton, West Burton and Tillbridge Solar proposals. As noted above in the Applciant's response to 1.2.21 - West Lindsey District Council, the C8.1.8_B Joint Report on Interrelationships Revision B [EN010133/EX3/C8.1.8_B] includes new information regarding other schemes. The Applicant has considered the worst case scenario which is all of the schemes being developed and therefore does not consider it necessary to consider the various combinations suggested by WLDC. The decision over what combination of Schemes may be acceptable, will lie with the Secretary of State, who could request further information at the time of decision-making if considered necessary.

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			DCO application is unacceptable based upon its cumulative impacts and, if the cumulative situation was concluded to be unacceptable, the current assessment does not allow for a decision where two of the project are considered to be acceptable. The reasoning behind WLDC's concern is triggered by the overlapping nature of cumulative projects, where by each ExA is assessing the single project in front of them only, but that none of the application are consented, and may be determined at the same time by the Secretary of State	
1.4.6	Lincolnshire County Council	LCC state (it its LIR [REP-085]) that it considers there would be significant impacts to landscape character that has the potential to affect the landscape at a regional scale. Please explain	In regards to landscape effects, the scale or size of a character area (District or Regional) should not be a determining factor in assessing effects – if it were, then any character area larger than at a "local" level would result in minimal change. We would urge caution in regard larger landscape character areas (such as at a regional scale), which often are assessed as having limited magnitudes of change as the change would be small scale and/or extent (development site) would only affect a relatively small percentage of the overall, much larger, character area. The LVIA should assess what	With regard to the assessment of landscape effects, the landscape receptors are sub-divided into individual receptors to provide a fine-grained assessment. These individual elements include Land Use, Topography and Watercourses, Settlements, Industry, Commerce and Leisure, Public Rights of Way, Nationally and Locally Designated Landscapes, Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and Gardens and Ancient Woodlands and Natural Designations. This approach was agreed with Lincolnshire County Council (LCC) and Nottinghamshire County Council (NCC) at a series of workshops to ensure full clarity

ExQ	Respondent	Question	Response	Applicant's Comment
		how LCC has reached this conclusion, identifying key characteristics within the landscape that it considers would be affected.	the change would be in that part of the character area and what identified key elements identified within the character areas are affected, and how development change would impact those. In summary - The baseline should identify the key elements and features that make up the character area, and the assessment should look at how these would be affected, not just the scale of the project in relation to the character area, even though that can be a factor. The test, or calibration, of this is if a national or regional character assessment was being carried out, if the development were constructed as proposed, how prominent would the development be both in isolation and cumulatively with other schemes in the area. Due to the scale and extent of these, which is unprecedented in the county and cumulatively in the country, these schemes would ultimately form a defining element of the landscape character. This would be a landscape change by replacing large areas of agricultural or rural land (the predominant existing land use)	of reporting and robustness and comprehensiveness across the assessment at this finer grained scale as opposed the larger grained scale character areas. With regard to both the broad grained and fine-grained scale, the conclusions of the assessment for the impact on the landscape receptors are set out within the individual assessment sheets at ES Appendix 8.2 Assessment of Potential Landscape Effects Revision A [REP-020] and summarised within C8.2.1 Supplementary Landscape Effects Tables [REP-060]. The assessment of landscape effects is undertaken in accordance with ES Appendix 8.1 LVIA Methodology [APP-068] which was agreed with Lincolnshire County Council and Nottinghamshire County Council.

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			with solar development, affecting the current openness, tranquillity and agricultural character that are currently identified as key defining characteristics. Solar development is currently not a defining characteristic and its introduction, along with associated infrastructure, fencing and CCTV would be a contrasting (urban) and extensive element in this rural, agricultural area.	
6. Biodiversity and the Habitats Regulations Assessment				
1.6.3	Natural England	In its detailed advice [RR-037] on Internationally Designated Sites and in relation to its WR [REP-098], has Natural England considered the Humber Estuary Ramsar site?	It is an error within our representations to have omitted reference to this designation. Paragraph 4.1.1 of the applicant's iHRA states: '*According to the Conservation of Habitats and Species Regulations 2017 (as amended), the network of national sites receiving protection under this legislation is limited to SACs and SPAs. Notably, Ramsar wetland sites are no longer considered part of this network although in effect receive protection through their overlap with SACs and SPAs.*' Natural England have discussed this with the applicant, as it is also government policy that Ramsar sites, potential SPAs, possible SACs and sites used to compensate for adverse	As set out in the Applicant's response to question 1.6.2 in [REP2-034] The ExA's First Written Questions, it is acknowledged that there was an omission of the Humber Estuary Ramsar site from the Information to Support a Habitat Regulations Assessment [APP-357] and ES Chapter 9: Ecology and Biodiversity [APP-044]. The Applicant confirms that this matter has been discussed with Natural England and a suitable approach has been agreed to the inclusion of the Ramsar site into the assessment. Consequently, it is anticipated that an updated C7.20 Information to Support a Habitats Regulations Assessment [APP-357] will be submitted at Deadline 3.

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			effects on European Sites are considered in the HRA process. This is described in paragraph 181 of the National Planning Policy Framework: *'181. The following should be given the same protection as habitats sites: a) potential Special Protection Areas and possible Special Areas of Conservation; b) listed or proposed Ramsar sites; and c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.'* The overlap between the SAC/SPA designations and Ramsar designation is noted, both geographically and with regard to the designated features. However this should not warrant the omission of consideration of the Ramsar designation in it's own right. All but one of the Ramsar features are also features of the SAC/SPA. Natterjack Toad are a feature of the Ramsar site only. Due to the physical separation of the site from the proposed development, and the limited range of the Natterjack Toad, Natural	

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			England do consider that impacts on this feature are unlikely, however, this should be noted within the ES/iHRA for completeness. In discussions regarding the Statement of Common Ground between Natural England and the Applicant, the applicant has noted the need for specific consideration of the Ramsar designation; this is forthcoming.	
1.6.14	7000 Acres	Please explain why you consider BNG is unproven in the UK at this scale and your concern in this regard [RR-041].	Please refer to document [REP2-095] for the full text of the response,	The Biodiversity Net Gain Assessment was carried out following the Defra Biodiversity Metric V3.1 which is a Government-approved and industry-leading methodology for the calculation of the change in ecological value of a site's habitats through development or land use change. The Applicant considers that Biodiversity Net Gain (BNG) is not a new concept within planning and development. The development of the Biodiversity Metric dates back to at least 2010 when it was developed for use in Defra pilot biodiversity offsetting projects. With the advent of the Environment Act 2021 and a shift in policy from 'no net loss' to mandatory BNG, the metric has since been refined and updated several times following extensive real-world application. The BNG Assessment for the Scheme [APP-089] has been prepared by experienced ecological

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				consultants and BNG practitioners who have specified and undertaken such assessments for approximately 50 other solar developments which have become legally binding. In addition, the assessor has undertaken post-construction ecological monitoring of habitats at over 200 active UK solar developments and therefore have gained unrivalled experience in understanding the efficacy of habitat creation and management prescriptions on solar sites and the achievement of ecological mitigation and BNG objectives. The habitat creation and management methods proposed for the Scheme are not considered, in the experience of the assessor, to be particularly complex or high-risk, being dominated in particular by the reversion of arable cropland to botanically diverse grassland types and the planting of species-rich hedgerows. The fact that in this instance, the scale of measures proposed are larger than for other schemes does not, in the Applicant's opinion, affect the overall likelihood of success. The objectives for habitat creation and management which are set out in the Outline Landscape and Ecological Management Plan Revision C [**EN010133/**EX3/C7.3_C], will be carried through into the biodiversity net gain strategy

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				which will be submitted for approval pursuant to Requirement 9 of the draft DCO as described in Section 8 of the BNG Assessment [APP-089]. Consequently, the Applicant believes that the BNG assessment is predicated on robust methodologies carried out by expert practitioners and builds in appropriate mechanisms which safeguard the achievement of objectives. Natural England has not raised any issues to date regarding the Applicant's methodology used to calculate BNG for the Scheme. However, if it would assist the ExA and Interested Parties, further detail of the Applicant's BNG calculations using Biodiversity Metric V3.1 could be provided.
7. The water environment				
1.7.12	Environment Agency	Please provide an update on the position as regards the Flood Risk Activity Permit. Please also clarify whether an Environmental Permit will be	The applicant has stated they wish to disapply the Environmental Permitting Regulations. Therefore, they will not need to apply for a Flood Risk Activity Permit. This will be managed by the Protective Provisions with the Environment Agency. We do however strongly encourage the applicant to register a flood risk activity exemption (FRA3 for any service crossing below the bed of a main river not involving	The Applicant agrees that for the proposed river crossings at SM1 and SM2 as defined in 'Table 1: Watercourse Crossing Locations' within C6.3.10.2 ES Appendix 10.1 Annex B 10.1.1 Cable Route [APP-091] a flood risk activity exemption will be applied for.

ExQ	Respondent	Question	Response	Applicant's Comment
		required for flood risk and/or land drainage.	an open cut technique) using the online form: Register a flood risk activity exemption - GOV.UK (register-flood-risk-exemption.service.gov.uk)	
1.7.22	Environment Agency	Please provide your comments on the revised Water Framework Directive Assessment [REP-043], including in relation to the matters that the EA raised in its RR [RR-026]	We are satisfied with the revised Water Framework Directive Assessment and have no further comments to make.	The Applicant notes this comment.
8. Soils and agriculture				
1.8.4	Natural England	What is Natural England's view over whether the Agricultural Land Classification survey follows Natural England guidance for such an assessment	Natural England raise no concern regarding the applicant's ALC survey methodology. The comments in our written representations relate to the representation of the ALC findings; the applicant has stated within the latest draft of their SoCG: *'In a proposed development of 1179ha, approximately 47.9ha of that area (4%) will not be available for continued agricultural use during the lifetime*	The Applicant concurs with NE that the proportion of BMV land present within the Sites is low and that the proportion of Sites occupied by temporary tracks, hardstanding and structures, is also low. As the duration of each of these temporary elements of the Scheme is effectively identical, the Applicant does not see any deficiency in not having a table of ALC grades against each individual element.

ExQ	Respondent	Question	Response	Applicant's Comment
		now that the Applicant has provided further information to Natural England regarding the amounts and proportions of agricultural land, including BMV across the full Order Limits?	*of the scheme. This 47.9ha comprises the combined area of substation, BESS and temporary access tracks and includes approximately 4ha of best and most versatile land. These elements will however be restored to agricultural use on decommissioning with no permanent loss of agricultural land as set out at paragraph 19.7.7 of C6.2.19 ES Chapter 19_Soils and Agriculture [EN010133/EX1/C6.2.19_A] . Biodiversity opportunity areas will not entail any loss of, or degradation to, the agricultural land resource, best and most versatile land or otherwise.'* We welcome the additional information provided, and acknowledge that the proportion of BMV across the order limits is low, and the proportion occupied by permanent infrastructure is also low. We do consider the presentation of the data within the ES could be more clear, with regards to representing the amount and proportion of land (including BMV) impacted by each element of the development. Nonetheless, this is not a matter we have any further concerns with, and we do consider the ALC survey itself is satisfactory	The Applicant notes that NE have no further concerns and considers the ALC survey to be satisfactory.

ExQ	Respondent	Question	Response	Applicant's Comment
9. Cultural Heritage				
1.9.4	West Lindsey District Council (WLDC)	Please confirm that the study areas identified in Section 13.4 of ES Chapter 13: Cultural Heritage [APP-048] have been agreed.	WLDC has not been asked to agree the study area identified in ES chapter 13. It is noted, however that Historic England consider the methodology to be 'proportionate' (SOCG October 2023; doc ref EX1/C8.3.4; Table 3.1 matter HE-1).	The Applicant notes this response.
1.9.4	Lincolnshire County Council	Please confirm that the study areas identified in Section 13.4 of ES Chapter 13: Cultural Heritage [APP-048] have been agreed.	The study area has been agreed.	The Applicant agrees the study area was agreed with LHPT, who act as archaeological advisors to Lincolnshire County Council.
1.9.4	Nottinghamshire County Council	Please confirm that the study areas identified in Section 13.4 of ES Chapter 13: Cultural Heritage	Nottinghamshire County Council believes that these were agreed with Lincs CC/LHPT who also provide planning advice for Bassetlaw DC. Nottinghamshire County Council was not involved in agreeing these study areas.	The Applicant agrees that the study areas were agreed with LHPT who act as archaeological advisors to West Lindsey (Lincolnshire) and Bassetlaw (Nottinghamshire).

ExQ	Respondent	Question	Response	Applicant's Comment
		[APP-048] have been agreed.		
1.9.4	Historic England	Please confirm that the study areas identified in Section 13.4 of ES Chapter 13: Cultural Heritage [APP-048] have been agreed.	The study area extent in the ES can be regarded as agreed by Historic England.	The Applicant agrees that the study areas were agreed with Historic England.
1.9.5	Historic England	Historic England's RR [RR-029] states that the application appears to have largely addressed the setting of designated heritage assets and earthwork monuments of equivalent importance apart from the Thorpe medieval	Yes.	The Applicant notes this response.

ExQ	Respondent	Question	Response	Applicant's Comment
		settlement Scheduled Monument (SM). Does that include all of the other designated heritage assets that Historic England drew to the Applicant's attention at the pre application stage, as is set out at paragraph 13.4.2 of ES Chapter: 13 Cultural Heritage? [APP-048] The Applicant is also to provide listing and schedule descriptions and conservation area appraisal (if it exists) for those		

ExQ	Respondent	Question	Response	Applicant's Comment
		assets. This is not required for the Thorpe medieval settlement SM, as this has already been provided.		
1.9.8	Historic England	It is noted that Historic England drew the Grade I listed Fillingham Castle to the Applicant's attention at the pre application stage. The Heritage Statement [APP-125] and paragraph 13.7.36 of ES Chapter: 13 Cultural Heritage [APP-048] has lowered the level of adverse effect on this asset, based on visibility.	The lowered level of adverse effect upon the significance of the Grade I listed Fillingham Castle selects from an initial assessed impact of Slight or Moderate. We note the argument set out at the above references as to likely visibility and prominence of panels at distance in this landscape context. Selection between Slight and Moderate impact introduces what may be the illusion of precision given the variety and multiplicity of individual visual experience of the Grade I house in its designed and borrowed landscape setting which need to be encompassed into that singular assessment. We also note that views from upper rooms and battlements / lead flats on the Castle itself were not accessible to assessment and are likely to be very broad. It may be safest to regard the likely level of impact as not worse than Moderate, with the potential to	The Applicant notes Historic England's response. The Applicant believes the conclusions made within ES chapter 13 on Cultural Heritage [APP-048], supported by the assessment made within Appendix 13.5 [APP-125 to APP-128] are appropriate, and the level of residual effect to Fillingham Castle is considered to be slight adverse. The Applicant would also highlight as per Historic England's Relevant Representation [RR-029], all *"that the application appears to have largely addressed the setting of designated heritage assets and earthwork monuments of equivalent importance apart from the Thorpe medieval settlement Scheduled Monument (SM)*".

ExQ	Respondent	Question	Response	Applicant's Comment
		What is Historic England's view on this approach?	be Slight depending upon the actual visual experience of the scheme in the landscape	
1.9.10	Historic England	The potential for a direct physical impact to the Site of a college and Benedictine Abbey, St Marys Church, Stow is indicated in paragraphs 13.8.2 and 13.8.5 of ES Chapter: 13 Cultural Heritage [APP-048], where mitigation is sought by way of a banksman to monitor the HGV where there is a requirement to mount the pavement in the village of Stow. Is a tracking plan	The use of a banksman to mitigate risk to heritage assets has the capacity to address risk of impact / strike and excess vibration / loading etc by reduction in driver error, vehicle speed / sudden breaking etc. However, such measures are only as effective as the degree to which they are integrated into practice via a movement management plan or similar which is 'owned' by the contractors and operatives undertaking the work, hence such a document and its implementation should we suggest be secured against a clear requirement covering its content, purpose, approval and monitoring (or within some more general requirement in respect of such documents).	The use of a qualified banksman will ensure no direct impact to the Scheduled site of Site of a college and Benedictine Abbey, St Marys Church, Stow as a result of the manoeuvring of abnormal loads. Further details relating to this requirement will be included within the CTMP, as specified in paragraph 6.14 of the outline Construction Traffic Management Plan **[EN010133/EX3/C6.3.14.2_D]**.

ExQ	Respondent	Question	Response	Applicant's Comment
		available of such a vehicle at the point where it would need to mount the pavement? Please also clarify whether there would be the potential for an effect on the structural integrity of this asset, such as on the foundations, caused by abnormal loads or other forms of construction traffic. Historic England's views are also sought on these matters.		

ExQ	Respondent	Question	Response	Applicant's Comment
1.9.14	Lincolnshire County Council	LCC has expressed in its RR [RR-001] that the baseline characterisation is inadequate but confirm that the agreed 2% coverage within the redline boundary was achieved. LCC's LIR [REP-085] also considers that the baseline characterisation is inadequate. Can LCC explain what information it considers is required to deem the baseline adequate in line with reference to relevant guidance and the	To clarify, 2% coverage has not been achieved within the redline boundary: as stated in our RR *'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.'* Adequate trenching is therefore still required for over 80% of the redline boundary. Where trenching has not been undertaken there is insufficient baseline evidence to identify significant surviving archaeology and to inform an effective mitigation strategy to deal with the impact on areas of archaeological sensitivity in a reasonable and appropriate way. Other NSIPs in Lincolnshire have undertaken full coverage of the redline boundary and as a result have identified significant archaeological sites during the trenching phase which are then dealt with as part of an informed effective mitigation strategy to adequately deal with the impact of the development. This in keeping with standard archaeological practice and guidance as well as relevant policies. We are guided by our professional	The Applicant respectfully disagrees with Lincolnshire Historic Place Team (LHPT) and considers that sufficient evaluation has been undertaken to inform the DCO Application and the C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation Written Scheme of Investigation (WSI) [APP-131] . The Scheme must be carried out in accordance with the WSI, and this is secured by Requirement 12 of Schedule 2 in C3.1_E Draft Development Consent Order Revision B [EN010133/EX3/C3.1_E] (provided at Deadline 3). This sets out how the Applicant must manage designated heritage assets, archaeological potential, and any new archaeological elements that may be identified as a result of the Scheme. 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]. Information on the trial trenching coverage at

ExQ	Respondent	Question	Response	Applicant's Comment
		geophysical surveys [APP110-122] that have been submitted.	Chartered Institute for Archaeology (CIfA) Guidance and Standards, their definition of a field evaluation is 'to determine the presence or absence of archaeology, to define their character, extent, quality and preservation, and enable an assessment of their significance.'	other solar schemes is provided within C8.2.10 Comparison of Archaeological Evaluation Investigations on Solar Schemes [EN010133/EX3/C8.2.10].The CIfA definition for an archaeological field evalution (as updated on the 05.12.2023) states: *"Archaeological field evaluation is a programme of non-intrusive and/or intrusive fieldwork which seeks to determine the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts. It may form a single or final phase of work within a defined area or site on land, in an inter-tidal zone or under water."* The guidance also states *"An archaeological field evaluation will seek to determine, record and report on the nature, extent, preservation and significance of archaeological remains within a defined area. The scope of the work will be described in a project design1 that is fit for purpose and will be carried out by suitably competent persons in accordance with that design and the CIfA Code of conduct and give due regard to the guidance for archaeological field evaluation. All archaeological field evaluations will result in a report, published*

ExQ	Respondent	Question	Response	Applicant's Comment
				accounts where appropriate, and a stable, ordered, accessible archive."
1.9.15	Lincolnshire County Council	As an alternative to an agreed % coverage area, are there specific areas of land within the Order Limits that could be the subject of the baseline characterisation? Lincolnshire County Council and the Applicant's views are sought on this. Please also signpost where such evidence in relation to these areas of land may be found within the application documentation.	There is no alternative within the redline boundary to undertaking sufficient trenching. Evaluation trenches need to cover not only the known and suspected areas of archaeology but also the so-called "blank" areas because there will be archaeology which is not picked up in other evaluation techniques, for example burials do not show up in geophysical survey and in cropmarks later activity may mask earlier surviving archaeology. Where adequate trenching has not been undertaken it leaves the archaeological potential unknown and undetermined in these areas. Without site-specific information on the surviving archaeology it would not be possible for the Applicant to determine what type of mitigation would be effective in preserving the archaeology. Fit-for-purpose mitigation is not possible outside those areas of currently known archaeology.	The Applicant considers that all areas within the Order Limits have been subject to sufficient baseline characterisation. The Applicant believes they have taken a reasonable and consistent approach guided by national and local guidance that has enabled an appropriate and proportionate archaeological assessment. As detailed in C6.2.13 ES Chapter 13 Cultural Heritage [APP-048] baseline information has been informed by 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]. These assessments have been used to successfully identify the absence/ presence/ extent of archaeological sites within the Order limits of the Scheme and an informed programme of C6.3.13.6 ES Appendix 13.6 Archaeological Evaluation Trenching [APP-129 and APP-130]. The

ExQ	Respondent	Question	Response	Applicant's Comment
			In terms of project management and risk management this defers a high level of risk to the developer in a post-consent situation of dealing with unexpected archaeology while the work programme has already commenced.	programme of informed evaluation trial trenching verified the effectiveness of baseline information (in particular the non-intrusive evaluation techniques) for identifying the presence, absence and extent of concentrations of archaeological sites, as well as providing information regarding their character, preservation and archaeological significance. While the Applicant agrees that burials can be difficult to detect using a magnetic geophysical survey technique, the Applicant highlights that burials are generally found in conjunction with structural remains (such as a boundary ditch) which can be identified by a magnetic geophysical survey technique. Such was the case within the Cottam scheme where identified burials were located adjacent to contemporaneous ditches that were recorded by the geophysical survey. The evaluation trenching targeting numerous cropmarks has demonstrated that there is no evidence for cropmarks to have masked earlier unrelated archaeological deposits. It is considered, based on the evidence of the range of non-intrusive investigations and targeted evaluation trenching, that there is low potential for

ExQ	Respondent	Question	Response	Applicant's Comment
				otherwise unrecorded archaeological remains of greater than local significance to survive within the Sites, and that if these were present, the impact of the solar mounts would have limited impact. Consequently the Applicant does not consider that further baseline characterisation is required to inform the DCO Application, and that there is sufficient information to inform the 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_E Draft Development Consent Order Revision E [EN010133/EX3/C3.1_E] (provided at Deadline 3).
1.9.17	Lincolnshire County Council	Lincolnshire County Council expressed in its RR [RR-001] that concrete feet may cause compaction and harm archaeology beneath, specifically, shallow archaeology. Has	No this concern has not been addressed. The applicant has provided a pro forma response and has not considered the issues we have raised. Specifically these issues are the shallow nature of the archaeology across the site and the large unevaluated areas where ground impacts of the development may damage and destroy unknown un-investigated unrecorded archaeology, whether that ground impact is through spikes, shoes, compaction, or any other	In a meeting on the 3rd of October 2023 the Applicant requested LCC to provide evidence of compaction to archaeological remains caused by concrete feet to support their position. In the same meeting LCC mentioned a recent site where compaction from concrete feet had been achieved through an engineering design solution. The Applicant requested details of the solution to see if this setup could also be used for the Cottam Scheme. The Applicant is yet to receive the requested information, and as such continues to highlight

ExQ	Respondent	Question	Response	Applicant's Comment
		the Applicant's response to the RR [REP049] addressed this concern?	ground impact including pond creation and scrapes. Mitigation measures cannot be deployed effectively unless the archaeologically sensitive areas have been identified and their depth, extent and significance is determined, otherwise so-called mitigation measures such as the use of shoes would destroy archaeology such as the unexpected Saxon skeletons which were revealed in trenching 20cm from the ground surface and would be crushed as well as unrecorded.	that concrete anchors are a nationally recognised method for archaeological mitigation by design. As demonstrated by guidance provided by Cornwall Council (See BRE Group, *Planning guidance for the development of large scale ground mounted solar PV systems*, 2013, p. 13), which is quoted in Historic England guidance on Commercial Renewable Energy Development and the Historic Environment, and the numerous examples of solar schemes where LPAs have agreed the use of concrete anchors to safeguard buried archaeological remains.
1.9.19	Nottinghamshire County Council	Nottinghamshire County Council has expressed at paragraph 2.71 of its LIR [REP-086] that the Applicant's approach to archaeological mitigation 'seems vague and ill defined'. Please	The Cottam scheme, as it affects Nottinghamshire, involves a cable trench with associated easement topsoil strip where the scheme runs through fields, and a substation and connection into the National Grid on part of the site of the former Cottam power station. This is a rich landscape, where arable fields reveal archaeological remains through cropmarks identified by aerial photography. These remains appear as patterns in fields because of the differential growth of vegetation, particularly cereal crops, over buried features such as walls and ditches. This area of the Trent valley and floodplain show complex patterns	The element of the Scheme located in Nottinghamshire comprises the shared cable corridor only, which is proposed to be used by the Scheme, Gate Burton Energy Park and West Burton Solar Project. The quality and extent of archaeological evaluation works (including trial trenching) as well as the mitigation strategy for the whole of the shared cable corridor, have previously been agreed with Lincolnshire Historic Places Team (LHPT), who the Applicant believes are the appointed archaeological advisors to Bassetlaw District Council in Nottinghamshire, and so are the correct archaeological advisors for this district of Nottinghamshire.

ExQ	Respondent	Question	Response	Applicant's Comment
		explain this comment.	of past riverine activity, with earlier channels of the river having deposited layers of alluvium and reworked areas of ground from the Late Palaeolithic onwards, both are processes which in some places still happen today. This in turn means that geophysical survey, often viewed as the acme of non-intrusive archaeological survey techniques, will work with variable degrees of success, further hampered by seasonal high ground water levels. Geophysical survey alone cannot define areas of archaeological significance and should not be relied upon solely or even mainly for identifying areas of archaeological mitigation. The cable route west of the Trent follows a route to be shared by several NSIP schemes. Archaeological evaluation trenching followed geophysical survey in this area. Some areas of the proposed cable route have not been trenched and not all identified geophysical anomalies were sampled. Despite this, the evaluation trenching on this part of the scheme is significantly more appropriate than the areas of the Cottam scheme to the East of the Trent. Here it would appear significant areas of the development site	It is understood that the comments in the Nottinghamshire LIR [REP-086] and response to EXQ 1.9.19 [REP2-075] have been provided by the Senior Practitioner (Archaeology) within the Planning Place Department of Nottinghamshire County Council. During the pre-application phase of the Scheme, at which time the archaeological evaluation works were undertaken within the shared cable corridor, monthly meetings were held between the Applicant and Nottinghamshire County Council. At no time did Nottinghamshire County Council raise objection to consultation on archaeological matters being undertaken with LHPT in their role as archaeological advisors to Bassetlaw. The Applicant has requested comments to C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation WSI [APP-131] from the various archaeological advisors to Nottinghamshire and Lincolnshire, and looks forward to receiving these, so that suitable wording can be agreed within the document between all parties on a without prejudice basis.

ExQ	Respondent	Question	Response	Applicant's Comment
			have had no evaluation through trial trenching, which is unacceptable, and a major risk to the overall sustainable deliverability of the scheme. The LIR prepared by LCC archaeological advisers notes the inadequacy of the archaeological work to date, and NCC archaeology agrees. The trial trenching of areas which have not shown geophysical anomalies should not be regarded as an optional extra, but as an archaeological requirement. While NCC archaeology do not work with percentage trial trenching as a standard at the outset of work, normal ranges for understanding complex landscapes, such as the Trent Floodplain and its adjacent higher ground, are found to be a minimum of 3-5% of the development site evaluated through trial trenching, particularly including "blank" geophysical areas, with an additional element for contingencies. The archaeological evaluation of the major part of the Cottam scheme - to the East of the Trent - was undertaken by different archaeological consultants from the cable scheme West of the Trent. The archaeological mitigation works for the cable	

ExQ	Respondent	Question	Response	Applicant's Comment
			route West of the Trent, whilst based on potentially inadequate evaluation work, involves a mix of preservation in situ through site avoidance and preservation by record. Please note; NCC archaeology prefer not to use the term "watching brief". Strip, map and sample (SMS) is our preferred term and approach, and standard NCC policy is to see all easement strips subject to SMS. This hopefully explains our earlier comment about the applicant's approach to archaeological mitigation in the NCC LIR response.	
10. Transport and access, highways and public rights of way				
1.10.13	Lincolnshire County Council	Would the Proposed Development deliver off-road parking provision, servicing and access arrangements in accordance with the Highway standards that the	LCC does not have parking standards but considers each development proposal on its merits. It would be expected that sufficient off road parking is provided for the number of employees on site given anticipated modal choice and implementation of the Travel Plan. This is referenced in The Construction Traffic Management Plan (2.12) and Table 4.2. An allowance for visitors is also required. Similarly for servicing, the agreed CTMP will need to demonstrate turning arrangements and sufficient waiting	Sufficient vehicle parking will be provided within the construction compounds. Sufficient turning arrangements and waiting areas will also be provided. This level of detail will be set out and agreed through the final Construction Traffic Management Plan(s) secured through Requirement 15 of C3.1_E draft Development Consent Order [EN010133/EX3/C3.1_E] (Version E provided at Deadline 3). All vehicles will arrive and depart in a forward gear. There will be no reversing onto/from the public highway. Where two-way access is not possible at

ExQ	Respondent	Question	Response	Applicant's Comment
		Highway Authority utilises. Please refer to those standards in your answer.	bays for HGVs within the site. All vehicles will be required to enter and exit the site in forward gear and 2 way movements need to be accommodated at the main access points.	the access, departing vehicles will be held within the Site if another vehicle is arriving at the same time. Delivery time management, through a booking system will ensure that instance of vehicles arriving and departing at the same time do not occur.
1.10.13	Nottinghamshire County Council	Would the Proposed Development deliver off-road parking provision, servicing and access arrangements in accordance with the Highway standards that the Highway Authority utilises. Please refer to those standards in your answer.	In terms of the proposed development within Nottinghamshire, this will principally involve the construction and laying of the pipeline and associated maintenance. Access points for construction are described in 2.74 of our Local Impact Report and we are strongly supporting a shared cable corridor and access arrangements with other NSIP projects feeding into Cottam substation. Agreement has been reached with the Gate Burton promoter over the width of construction accesses and a reduced level of access for maintenance which would allow reinstatement of hedgerows etc and it is hoped that these will be common with other schemes. General standards are set out in the Nottinghamshire Highway design guide but given the proposed development is on lightly trafficked roads, arrangements for construction access/ splays etc can be varied. Unfortunately, at the time of writing	The accesses for the cable route corridor, including those within the jurisdiction of Nottinghamshire County Council are shown in Appendix E of the C6.3.14.1_A ES Appendix 14.1 Transport Assessment Revision A [REP2-014] and Appendix C of the C6.3.14.2_B ES Appendix 14.2 Construction Traffic Management Plan [EN010133/EX3/C6.3.14.2_D]. The location of the accesses match those of Gate Burton Energy Park. Accesses will go through a technical approval process with Nottinghamshire County Council, and this will be secured through the final Construction Traffic Management Plans secured through Requirement 15 of C3.1_E draft Development Consent Order [EN010133/EX3/C3.1_E] (Version E provided at Deadline 3). .

ExQ	Respondent	Question	Response	Applicant's Comment
			this response, the local highway officer is on extended sick leave and it is has not been possible to confirm specifically but if the proposal matches the agreed provision for access arrangements as developed by the Gate Burton scheme then it may be expected to be satisfactory.	
12. Socio-economics, tourism, and recreation				
1.12.9	West Lindsey District Council (WLDC)	Is the Blyton Park Driving Centre and the Automotive Research and Development Centre afforded any protection under the development plan?	The Blyton Park Driving Centre and the Automotive Research and Development Centre is not afforded any site- specific protection or designation in the Central Lincolnshire Local Plan (2023). Policy S5 (Development in the Countryside) would be engaged.	The Applicant notes this comment. Central Lincolnshire Local Plan Policy S5 has been considered in at paragraph 6.15.4 and Appendix 4 of C7.5_C Planning Statement Revision C [EN010133/EX3/C7.5_C].
1.12.10	West Lindsey District Council (WLDC)	Noting the full copy of the Central Lincolnshire Local Plan (2023) which the Council	WLDC believes that the proposed development would have a bearing on the agri-food sector. The agri-foods sector is a priority sector in West Lindsey and Lincolnshire as a whole. The is expected to benefit from significant	The Applicant refers to its response to question 1.12.6 in C8.1.15 Applicant's Responses to ExA First Written Questions [REP2-034]. Section 18.7 of C6.2.18 ES Chapter 18_Socio Economics Tourism and Recreation [APP-053]

ExQ	Respondent	Question	Response	Applicant's Comment
		provided with its LIR [REP-091], would the Proposed Development have any bearing where it concerns the agri-food sector?	growth in the future with shows at the Lincolnshire showground potentially doubling the economic value of the agri-food sector in Greater Lincolnshire by 2030, as set out in Policy S28 Spatial Strategy for Employment and S44: Lincolnshire Showground. Cottam and the other proposed solar farms will result in job losses which are unlikely to return after the schemes are decommissioned in 40-60 years. Greater Lincolnshire Local Enterprise Partnership (GLLEP) area enjoys a mix of traditional manufacturing, a comprehensive agri-food sector, energy and services, and is strong in health and care and the visitor economy. The agri-food sector is provide significant benefits from a large number of small businesses – a distinctive feature of the economy. The Schemes impact on the agricultural jobs in the area will have a significant impact on local businesses. The ES does not provide a comprehensive assessment of the impact of to any contractor related services to the farm. Therefore the breakdown of the jobs lost as a result of the scheme is not clear.	assesses the economic impact of the Scheme to the local and regional economy. Agricultural contractors do not have tenure over land that they provide agricultural contractor services for. There is therefore no assessment of impact upon an agricultural contractor under Farming Circumstances in the Soils and Agriculture chapter of the ES (C6.2.19 ES Chapter 19 Soils and Agriculture [APP-054]) as any effect is indirect to a third party business that under business as usual, may provide services in the future. ES Chapter 18 Socio Economics Tourism and Recreation (C6.2.18 [APP-053]) considers agricultural sector employment rather than individual farm businesses occupying sites. Paragraph 18.7.15 describes a moderate-minor adverse effect in the local area, and negligible change in the regional area. This is therefore not a significant effect, and it is not therefore anticipated that there are any other significant effects to the agri-food sector and related industries. The long term declining trend in numbers of workers in agricultural employment should also be noted, along with current difficulties faced by farms and agricultural contractors in attracting suitable employees.

ExQ	Respondent	Question	Response	Applicant's Comment
1.12.18	7000 Acres	Paragraph 3 of 7000 Acres' Equality Impact Assessment WR [REP-107] refers to the Travelling Community. Please clarify if this is a general remark or if it is referring to a specific site(s) within or close to the Order Limits.	There are 2 traveller sites within all the schemes. The question within the Equality Impact Assessment was directed to the applicant as a way of highlighting deficiencies within their desk top review which made up this assessment. The document dated 24th February 2014 West Lindsey District Council Gypsy and Traveller Accommodation assessment clarifies the number of traveller sites in their district. Within this is a consultation document commissioned (2013) by the County Council and the 4 District Councils highlighting the issues around accommodation within the County, it highlights specific health inequality issues that the Travelling Communities face. The 2 sites are: Upton (2 sites, 7 pitches), close to the Order Limits both Gate Burton, Cottam and Tillbridge, and a permanent site at Odder on the River Till (close to the West Burton scheme) near to its junction with the river Witham (10 permanent caravans). During the recent storms, the River Till was at its maximum capacity which if exceeded, it will flood this site. Therefore, a thorough evaluation as to flood drainage off the new	The Applicant notes these comments. The Gypsy and Traveller Accommodation sites identified by 7000 Acres in Upton are located some 3.0km from the Order Limits, and more than 5km from the Order Limits for Cottam with regard to Odder Bridge Caravan Park. As such, acknowledging known health or deprivation inequalities within the community, it is not anticipated that groups are likely to be disproportionately impacted by the Scheme with regard to socio-economic, and health and wellbeing impacts, nor at a greater risk of social isolation as a result of the Scheme. With specific regard to Odder Bridge, the Applicant acknowledges that the Scheme is upstream of this site on the River Till. That notwithstanding, the panelled areas are not expected to increase surface water runoff from the Sites as the grassland beneath them still exists and will be brought back to a more natural state than it is currently in. Soil and surface management is considered in section 4.0 and paragraph 5.3.4 of the C6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-090]. The proposed drainage strategy is detailed within Section 5.0 [APP-090]. It is considered that

ExQ	Respondent	Question	Response	Applicant's Comment
			proposed fields with solar panels could impact this site considerably. This group were not consulted as they lie outside the targeted area by Island Green Power. This highlights the importance of looking at impacts beyond the schemes that could affect Human Health and Wellbeing. We feel therefore under the protected characteristics and for those hard-to-reach groups, there has been an inadequate attempt to consult with them. Literacy issues are high, so as a group the applicant should have found alternative ways to engage with them. Mental health is a key issue within this community. Isolation from community structures creates problems with wellbeing, social function and mental health. It is therefore important that the applicant engages with this community. Also, the health status of this community is worse than the average population. Therefore, we suggest a Health Impact Assessment be carried out as part of the EIA.	the panelled areas will not alter the existing surface water run-off regime and will therefore not be formally drained. Areas of increased hardstanding such as smaller areas of hardstanding formed as footings for electrical infrastructure will utilise sustainable drainage (SuDS) principles and attempt to mimic the existing surface water run-off regime as existing. Both Upton and Odder were included in the Core Consultation Area for Section 47 statutory consultation in summer 2022. As such, residents were in receipt of mailed leaflets and invitations to in-person community information events, to ensure those with limited internet access were able to access the consultation. This is set out in Section 8 of C5.1 Consultation Report [APP-021]. As such, the Applicant is confident that appropriate measures were made to ensure hard-to-reach groups such as gypsy and traveller communities were suitably included in the consultation process.
1.12.22	7000 Acres	7000 Acres' RR [RR-041] states	As stated in our Written Representation, we felt that given the size and scale of this and	The Applicant refers to their detailed responses to the Written Representations made by 7000 Acres

ExQ	Respondent	Question	Response	Applicant's Comment
		there is the possibility of socioeconomic decline from the cumulative effect and size of these developments, which would then affect people's health and wellbeing, which then has the long-term potential to impact on health inequality. Please explain.	the other schemes, a Health Impact Assessment should have been triggered. This would have required the applicant to consult with Lincolnshire Public Health and the Integrated Care Board (NHS), who have a better understanding of the health issues around Gainsborough and its surroundings. A Health Equity Assessment Tool (Public Health England) would have been required to assess whether or not this and the other schemes would have potential to widen health inequalities as well as affecting the NHS initiative Core20Plus 5. Gainsborough has areas of marked deprivation where there are higher levels of economic inactivity and low social mobility. There is also a higher premature mortality rate in this area compared to the Lincolnshire average, approximately 973 deaths per 100,000 patients which is the third highest in Lincolnshire and higher than the Lincolnshire average. If you reduce inequality, you reduce life expectancy. The overlapping dimensions of health inequality are, socioeconomic groups and deprivation, inclusion health and vulnerable groups,	on matters of socio-economics, human health and wellbeing, equality, and deprivation in C8.1.18 The Applicants Responses to Written Representations Part 2 [REP2-050].

ExQ	Respondent	Question	Response	Applicant's Comment
			geography (rural or urban), protected characteristics in the Equality Duty. By altering the environment in rural communities has the potential to drive more younger people out leaving above average middle-aged and older people. This increases the risk of social isolation and loneliness, and leaving a more vulnerable older population who need the younger population to help provide social care within our communities. Mental health and the environment are linked, and therefore schemes like this that destroy the visual aspect of the countryside may increase long term mental health issues, which in itself is a disability. We know that green space is beneficial to physical health as well, which then improves health outcomes with reduced mortality from stroke, coronary heart disease, reduction in stress and decline in dementia. Remove this green space and health will suffer as a result. Depression is already increasing in rural areas, and we know that suicide is high in farmers. For those who continue farming by not handing their land to solar development, they may feel disadvantaged and therefore	

ExQ	Respondent	Question	Response	Applicant's Comment
			have further increased risk of mental health issues by the nature of their job where rural space is key. The Equality Impact Assessment produced at desk top, has failed to highlight those vulnerable groups. By doing a Health Impact Assessment, these marginalised groups would be identified, satisfactory mitigation and clear understanding of the rural issues of Gainsborough and its surroundings. We have single parents, single pensioners, military veterans, and a larger proportion of elderly. There are issues around deprivation in certain wards of Gainsborough with higher proportion of people going through these areas (increased turnover), greater family needs, a disconnect with youth, higher levels of renting, little child care, lower unemployment rates, with lower life and health life expectancy in both males and females. This all needs to be considered as one cannot exclude the town of Gainsborough, which is surrounded by these schemes. Please refer to the Written Representation on Human Health and Wellbeing for a more comprehensive overview how health in our	

ExQ	Respondent	Question	Response	Applicant's Comment
			area will be impacted if these schemes go ahead.	
1.12.26	Lincolnshire County Council (main and late submissions)	Can the Council provide more information in relation to 'claimed paths' that are referred to in paragraph 9.4 of its LIR [REP-085]. Also, where paragraph 9.5 refers to a requirement for more details and opportunities for enhancement, which Public Rights of Way is it referring to?	Please refer to documents [REP2-073] and [REP2-074] for the full text and maps of the response.	The C6.3.14.3_B Appendix 14.3 Outline Public Rights of Way Management Plan Revision B [REP2-018] includes reference to 'claimed paths' and 'Definitive Map Modifications Orders (DMMO)'. In relation to the construction phase, paragraph 3.20 of the C6.3.14.3_B Appendix 14.3 Outline Public Rights of Way Management Plan Revision B [REP2-018] states: *"It is acknowledged that there are several outstanding Definitive Map Modification Order (DMMO) applications for areas within and nearby the Site. If these orders are made, they will be managed during construction in a similar manner to other PRoWs where practicable to do so. However, as the final location of the proposed PRoW is not currently known it may be necessary to close and/or divert any new PRoW during construction if required to ensure deliverability of the Scheme.* *The final Public Rights of Way Management Plan submitted for approval will incorporate mitigation measures for any new PRoWs"* In relation to the operational phase, paragraph 4.5 of the C6.3.14.3_B Appendix 14.3 Outline Public

ExQ	Respondent	Question	Response	Applicant's Comment
				Rights of Way Management Plan Revision B [REP2-018] states: *"It is acknowledged that there are several outstanding Definitive Map Modification Order (DMMO) applications for areas within and nearby the Site. If these orders are made, any new PRoW will be managed during operation of the Scheme where practicable to do so. However, as the final location of the proposed PRoW is not currently known, it may be necessary to close and/or divert any new PRoWs during operation if required to ensure deliverability of the Scheme.* *The final Public Rights of Way Management Plan submitted for approval will incorporate mitigation measures for any new PRoWs".*
13. Other planning matter				
1.13.21	Environment Agency	Please clarify whether an Environmental Permit will be required for land contamination related matters.	We are not aware of any remediation or abstraction that would require an Environmental Permit.	The Applicant notes this comment.

ExQ	Respondent	Question	Response	Applicant's Comment
1.13.47	Environment Agency	Will an Environmental Permit be required for any aspect of the battery energy storage systems?	The site will not require an Environmental Permit for the BESS. However, as the BESS has the potential to pollute the environment, we would recommend the applicant considers the impact to all environmental receptors during each phase of the development. We have provided some comments below for information: <u>Environmental considerations</u> Particular attention should be applied to the impacts on groundwater and surface water from the escape of firewater and/or foam and any contaminants that it may contain. Suitable environmental protection measures should be provided including systems for containing and managing water run-off. The applicant should ensure that there are multiple 'layers of protection' to prevent the source-pathway-receptor pollution route occurring. Further guidance on considering potential risks of BESS in planning applications is available online: Renewable and low carbon energy - GOV.UK (www.gov.uk)	The risk of contamination mobilised by surface water or firewater from the BESS site is considered in paragraph 3.4.4 and section '3.11 Firewater Risks' within C6.3.10.4 ES Appendix 10.1 Annex D 10.1.3 Cottam 1 West [APP-093]. Given the potential risk it is considered that the substation and battery storage areas could be constructed within bunded areas lined to prevent infiltration. The outfalls from the proposed drainage onsite would then be controlled via valves which would close and isolate the site from the wider environment in the event of a fire, allowing for appropriate treatment and disposal of any contaminated water. The Applicant notes that responsibility for arranging recycling operations lies with industrial battery producers and / or BESS OEMs. With regard to regulation for batteries and waste, the Applicant is confident that the relevant legislation and regulations have been properly considered in C6.2.20 ES Chapter 20 Waste [APP-055]. The producer responsibility regulations of pertinence to this Scheme are the WEEE Regulations 2013 and Waste Batteries and Accumulators Regulations 2009. Furthermore, the relevant controls to ensure battery storage systems are suitably operated, decommissioned, and reused or recycled as

ExQ	Respondent	Question	Response	Applicant's Comment
			Regulations for batteries and waste Energy storage will play a significant role in the future of the UK energy sector. Effective storage solutions will benefit renewables generation, helping to ensure a more stable supply and give operators access to the Grid ancillary services market. The National Grid's Enhanced Frequency Response programme will provide a welcome catalyst for a significant level of battery storage deployment in the UK. Currently, DEFRA does not consider the need to regulate the operation of BESS facilities under the Environmental Permitting Regulations regime. However, an important factor that can be overlooked by parties involved in new battery storage projects or investing in existing projects is that battery storage falls within the scope of the UK's producer responsibility regime for batteries and other waste legislation. This creates additional lifecycle liabilities which must be understood and factored into project costs, but on the positive side, the regime also creates opportunities for battery recyclers and related businesses. Operators' of battery	appropriate, are set out in C7.16_B Outline Operational Environmental Management Plan Revision B [EN010133/EX3/C7.16_B], and C7.2_A Outline Decommissioning Statement Revision A [EN010133/EX3/C7.2_A].].

ExQ	Respondent	Question	Response	Applicant's Comment
			storage facilities should be aware of the Producer Responsibility Regulations. Under the Regulations, industrial battery producers are obliged to: • take back waste industrial batteries from end users or waste disposal authorities free of charge and provide certain information for end users; • ensure all batteries taken back are delivered and accepted by an approved treatment and recycling operator; • keep a record of the amount of tonnes of batteries placed on the market and taken back; • register as a producer with the Secretary of State; • report to the Secretary of State on the weight of batteries placed on the market and collected in each compliance period (each 12 months starting from 1January). Putting aside the take back obligations under the producer responsibility regime, batteries have the potential to cause harm to the environment if the chemical contents escape from the casing. When a battery within a	

ExQ	Respondent	Question	Response	Applicant's Comment
			battery storage unit ceases to operate, it will need to be removed from site and dealt with in compliance with waste legislation. The party discarding the battery will have a waste duty of care under the Environmental Protection Act 1990 to ensure that this takes place. The Waste Batteries and Accumulators Regulations 2009 also introduced a prohibition on the disposal of batteries to landfill and incineration. Batteries must be recycled or recovered by approved battery treatment operators or exported for treatment by approved battery exporters only. Many types of batteries are classed as hazardous waste which creates additional requirements for storage and transport.	
1.13.2	Lincolnshire County Council	Paragraph 20.5.15 of ES Chapter 20: Waste [APP-055] confirms that baseline estimates only	The Council is concerned that, looking at the figures quoted in 20.5.3 and following, they don't seem to match up with the Councils Waste Needs Assessment'	The Applicant has set out below the sourcing of the figures quoted in paragraphs 20.5.3-20.5.7 in C6.2.20 ES Chapter 20 Waste [APP-055]: In paragraph 20.5.4 [APP-055] the C,D&E waste production baseline of 901,000 tonnes per annum

ExQ	Respondent	Question	Response	Applicant's Comment
		cover up to 2038. How will reassessment beyond 2038 be dealt with regard to the EIA Regulations and by the revised draft DCO [REP-006]?		from 2020 to 2045 is quoted from paragraph 4.14 of the WNA 2021 – Report 3. In paragraph 20.5.5 [APP-055] the combined recycling, reuse, transfer, and treatment rate for CD&E waste of 75% is derived from Table 16 of the WNA 2021 – Report 3, wherein the management targets at Yr5 (2025) total 75% for source separated material, recycled aggregates, and recovery. The 676,000 tonnes per annum figure is therefore 75% of the total 901,000 tonnes per annum baseline figure (rounded to 3 significant figures). In paragraph 20.5.5 [APP-055], the handling capacity in recycling and recovery sites of 834,000m^3 is totalled from the capacity for inert and non-inert recycling/recovery capacity in Table 20 of the WNA 2021 – Report 3 (rounded to 3 significant figures). The figure of approximately 1,330,000 tonnes per annum (rounded to 3 significant figures) is derived from this capacity multiplied by 1.6 tonnes per m^3 (the weight by volume of inert waste as published in paragraph 4.19 of the WNA 2021 – Report 3). In paragraph 20.5.5 [APP-055], the resultant excess capacity of 658,000 tonnes per annum for the duration 2020-2045 is taken as an average capacity

ExQ	Respondent	Question	Response	Applicant's Comment
				based on the derived 1,330,000 tonnes per annum capacity, less the derived 676,000 tonnes per annum target handling rate. In paragraph 20.5.6 [APP-055], the baseline rate of landfill from CD&E of 225,000 tonnes per annum is taken from Tables 16, 17, and 18 of the WNA 2021 – Report 3. The estimated inert landfill handling capacity of 201,000 tonnes per annum is derived from the 3.14 million m^3 capacity demonstrated in Table 20 of WNA 2021 – Report 3: • 3,140,000m^3*1.6 tonnes/m^3 = 5,020,000 tonnes • 5,020,000 tonnes / 25 years (plan period 2020-2045) = 201,000 tonnes per annum Table 20 of WNA 2021 – Report 3 goes on to demonstrate a substantial excess capacity for non-inert landfill of 5.31 million m^3: • 5,310,000m^3*1.6 tonnes/m^3 = 8,500,000 tonnes • 8,500,000 tonnes / 25 years (plan period 2020-2045) = 340,000 tonnes per annum As such, as stated in paragraph 20.5.6 [APP-055], the combined inert and excess non-inert landfill capacity is 541,000 tonnes per annum for the plan period 2020-2045.

ExQ	Respondent	Question	Response	Applicant's Comment
				The Applicant notes that the figure stated in paragraph 20.5.6 [APP-055] for total void capacity filled per annum (1.66%) is incorrect, and should read 3.11%, as derived from Table 18 and 20 of WNA 2021 – Report 3: • Cumulative non-inert landfill: 3.99 million tonnes = 3.99 million m3 (estimated at 1 tonne per m3 as per para. 4.20 of WNA 2021 – Report 3) • Cumulative inert landfill: 7.22 million tonnes = 4.51 million m3 (estimated at 1.6 tonne per m3 as per para. 4.19 of WNA 2021 – Report 3) • Total landfill requirement volume: 8.50 million m3, therefore average per annum = 340,000 m^3 per annum • Total void capacity is 3.14 million m3 + 7.80 million m3 = 10.9 million m3. • Per annum rate 340,000/10,900,000 = 3.11% per annum This does not however change the designation of landfill sites in Lincolnshire as a medium sensitivity receptor to change (defined as 1-5% change from baseline void capacity). In paragraph 20.5.5 [APP-055], the resultant excess capacity of 316,000 tonnes per annum for the duration 2020-2045 is taken as an average capacity

ExQ	Respondent	Question	Response	Applicant's Comment
				based on the derived 541,000 tonnes per annum capacity, less the 225,000 tonnes per annum target handling rate. In paragraph 20.5.6 [APP-055], the capacity for managing hazardous waste (including WEEE) of 67,000 tonnes per annum is taken from Table 9, and paragraphs 4.5 and 6.2 of WNA 2021 – Report 4.
1.13.4	Lincolnshire County Council	How are the destinations for construction waste in Table 20.5 of ES Chapter 20: Waste [APP-055] reflective of the waste hierarchy, given the number of references to landfill disposal and as most destinations are shown as recycling or landfill?	This is indeed a concern to the Council, particularly as some of the waste types are subject to specific legislation about what must happen to them – e.g. WEEE, packaging. This would also give more clarity as to whether there is sufficient capacity for each disposal category.	The Applicant refers to its response to question 1.13.4 in C8.1.15 Applicant's Responses to ExA First Written Questions [REP2-034].

ExQ	Respondent	Question	Response	Applicant's Comment
		Similarly, with regard to Tables 20.6 and Table 20.7, further explanation on how the waste hierarchy will be followed across the project is required and how this will be dealt with through the revised draft DCO [REP1-006]?		
1.13.5	Lincolnshire County Council	To what extent will the proposed solar panels be able to be recycled, re-used and recovered? Are such waste facilities available to deal with solar panels?	Not aware of any, and the Council's perception is that this will become increasingly important over time. Indeed, there is a danger that such facilities will only appear (in sufficient numbers/capacity) after the creation of a 'panel mountain' – Reminiscent of the WEEE recycling capacity which appeared with the 'fridge mountain'.	The Applicant refers to its response to question 1.13.5 in C8.1.15 Applicant's Responses to ExA First Written Questions [REP2-034].

ExQ	Respondent	Question	Response	Applicant's Comment
1.13.6	Lincolnshire County Council	Where ES Chapter 20: Waste paragraph 20.7.32 [APP-055] sets out that the assumption is that waste is handled proportionally between Lincolnshire and Nottinghamshire, what does this mean and how is this addressed by the revised dDCO [REP1-006]?	Also specify: • Do they mean 50% to each county, equally by specified site, or something else? How does this relate to 20.8.2 which mentions 'effort to bias landfill waste handling in Lincolnshire where there is greater predicted capacity to reduce waste streams required to be handled in Nottinghamshire'? (see Q1.13.8 below)	The Applicant refers to its response to questions 1.13.6 and 1.13.8 in C8.1.15 Applicant's Responses to ExA First Written Questions [REP2-034].
1.13.7	Lincolnshire County Council	The Proposed Development includes a number of product types and materials that are deemed hazardous, in particular associated with	Some of these materials may be part of items covered by specific waste-type legislation such as the WEEE Regulations.	The Applicant refers to its response to question 1.13.7 in C8.1.15 Applicant's Responses to ExA First Written Questions [REP2-034].

ExQ	Respondent	Question	Response	Applicant's Comment
		the battery storage and the substations. How will these be dealt with in a safe manner, and how will this be addressed by revised dDCO [REP1-006]?		
1.13.8	Lincolnshire County Council	In light of that a significant effect on landfill waste handling in Nottinghamshire during the decommissioning period has been identified, please provide greater detail over the specific mitigation measures and how a bias towards Lincolnshire will	This is a particular concern given (see Q1.13.4 above) that most C&D waste seems to be destined for 'recycling or landfill'	The Applicant refers to its response to question 1.13.8 in C8.1.15 Applicant's Responses to ExA First Written Questions [REP2-034].

ExQ	Respondent	Question	Response	Applicant's Comment
		impact on the landfill resource in that county. Please also provide further explanation over how this is seen to reduce the effect to not being significant (ES Chapter 20: Waste paragraphs 20.8.2 and 1 (sic)) [APP-055].		
1.13.9	Lincolnshire County Council	With regard to cumulative effects under ES Chapter 20: Waste paragraph 20.10.8 [APP-055), what does the assumption that waste is handled proportionally between	See also Q1.13.6 above which seems very similar.	The Applicant refers to its response to question 1.13.9 in C8.1.15 Applicant's Responses to ExA First Written Questions [REP2-034].

ExQ	Respondent	Question	Response	Applicant's Comment
		Lincolnshire and Nottinghamshire mean in practice across the 4 sites and if that was not the case, would the magnitude of impact change? It would assist to clarify if there have been discussions between the developers of each of the sites in this regard.		
1.13.10	Lincolnshire County Council	ES Chapter 20: Waste paragraph 20.10.13 [APP-055] appears to exclude some waste streams from the calculation. Could	Table 20.10 appears to assume that the only 'significant' decommissioning waste will be the 'solar PV equipment' itself, but won't there also be waste from restoring the site?	The Applicant refers to its response to question 1.13.10 in C8.1.15 Applicant's Responses to ExA First Written Questions [REP2-034]. With specific regard to waste from restoration works, excavation waste has been adequately assessed during construction in Table 20.5 of C6.2.20 ES Chapter 20 Waste [APP-055]. Subject to the implementation of the measures set out in

ExQ	Respondent	Question	Response	Applicant's Comment
		therefore the waste volumes set out in Table 20.10 (sic) be higher by including metal, etc, and approximately by how much?		C6.3.19.2 A ES Appendix 19.2 Outline Soil Management Plan Revision A [REP2-020] the quantum of materials for site restoration can be minimised, and as such will not generate significant waste arisings.
1.13.11	Lincolnshire County Council	The embedded mitigation as set out in section 20.6 of ES Chapter 20: Waste [APP-055] includes a number of third party contractors in relation to the recovery, recycling and disposal of waste. Whilst it is noted that it would be the intention that this would be covered by the Decommissioning	Although some protection is in place through legal requirements such as Duty of Care and compliance with the Waste Hierarchy.	The Applicant refers to its response to question 1.13.11 in C8.1.15 Applicant's Responses to ExA First Written Questions [REP2-034].

ExQ	Respondent	Question	Response	Applicant's Comment
		Statement [APP-338] and the Operational Environmental Management Plan [APP-353], how will it be ensured that third party contractors will adhere to it?		
1.13.12	Lincolnshire County Council	ES Chapter 20: Waste paragraph 20.11.2 [APP-055] considers the impacts from the scheme can be sufficiently mitigated. How does this though relate to the cumulative effects, in particular with the significant effect on landfill waste handling in	Not clear what 'cumulative effects' are being referred to other than the specific one regarding Notts landfill but what about the cumulative impacts in Lincolnshire from the many solar NSIP schemes that continue to emerge?	The Applicant refers to its response to question 1.13.12 in C8.1.15 Applicant's Responses to ExA First Written Questions [REP2-034]. For clarification, the cumulative projects assessed in C6.2.20 ES Chapter 20 Waste [APP-055] are Cottam Solar Project, West Burton Solar Project, Gate Burton Energy Park, and Tillbridge Solar Project. This position is being kept under review, and will be amended as required through the future updates to C8.1.8_B Joint Report on Interrelationships Revision B [EN010133/EX3/C8.1.8_B].

ExQ	Respondent	Question	Response	Applicant's Comment
		Nottinghamshire during decommissioning?		
1.13.14	Lincolnshire County Council	Where paragraph 11.5 of the Council's LIR [REP-085] refers to a requirement for a waste management strategy, would the OEMP [APP-353] and the Decommissioning Plan [APP-338] under the DCO fulfil this function?	The requirement for a 'waste management strategy' should be a separate document that is submitted separately directly to the Waste Planning Authority for approval and monitoring pursuant to a separate requirement rather than being part of the OEMP and needs to be in place well in advance of the Decommission Plan to ensure that adequate facilities are in place prior to decommissioning.	The Applicant respectfully disagrees that a separate requirement for provision of a 'waste management strategy' is required. The Applicant has however included the provision for a waste management strategy to be submitted as part of C7.16_B Outline Operational Environmental Management Plan Revision B [EN0101033/EX3/C7.16_B] and C7.2_A Outline Decommissioning Statement Revision A [EN010133/EX3/C7.2_A].
1.13.30	Nottinghamshire County Council	Can you further please explain paragraph 2.82 of the Council's LIR [REP086] in relation to Sturton Le Steeple Quarry and what is meant	This is an error arising from a comment made in respect of earlier iterations of the Cottam and West Burton Solar Schemes when there were wider cable corridor options. The proposed cable route for Cottam does not affect the Sturton le Steeple quarry. Paragraph 2.82 should end after the second sentence.	The Applicant notes this comment.

ExQ	Respondent	Question	Response	Applicant's Comment
		by a northern cabling route option in relation to the cable route that is proposed?		
1.13.46	Lincolnshire County Council	Does the recent addition to the PPG: Renewable and Low Carbon Energy concerning battery energy storage systems have a bearing on this case, including the role of the Fire and Rescue Service?	It is relevant and it confirms the role of the Fire and Rescue Services which the Council has sort to represent with the involvement of Lincolnshire Fire and Rescue throughout the pre-application and pre-examination stages.	The Applicant refers to its response to question 1.13.46 in C8.1.15 Applicant's Responses to ExA First Written Questions [REP2-034]. The Applicant notes this comment and is continuing to engage with Lincolnshire Fire and Rescue via Lincolnshire County Council through the C8.3.2_B Lincolnshire County Council Statement of Common Ground (Draft) [EN010133/EX3/C8.3.2_B].
1.13.48	Lincolnshire County Council	Is the Council's 'neutral' conclusion in its LIR (REP-085] on health and fire safety predicated on a financial contribution via a	Yes or via the means of Protective Provisions which is the mechanism that is being used in the Gate Burton examination	A financial contribution has been agreed with Lincolnshire Fire and Rescue Service who are a part of Lincolnshire County Council. This is secured via protective provisions found at Part 16 of Schedule 16 to C3.1_E draft Development Consent Order [EN010133/EX3/C3.1_E] which has been provided at Deadline 3. These protective provisions mirror those provided for Lincolnshire

ExQ	Respondent	Question	Response	Applicant's Comment
		Section 106 Agreement, as is referred to in paragraph 14.8?		Fire and Rescue Service within the Gate Burton draft Development Consent Order.
1.13.49	Lincolnshire County Council	Do you consider that there is sufficient water storage for a thermal runaway situation and will the spacing of battery containers lead to any fire risk issues?	As outlined in the initial requirements document LFR ask that the developer can '*ensure that sufficient water is available for manual* firefighting. *An external fire hydrant should be located in close proximity of the BESS containers.* *– The water supply should be able to provide a minimum of 1,900 l/min for at least 120 minutes (2 hours). Further hydrants should be strategically located across the development. These should be tested and serviced at regular intervals by the operator. If the site is remote from a pressure feed water supply, then an Emergency Water Supply (EWS) meeting the above standard should be incorporated into the design of the site e.g. an open water source and/or tank(s). If above ground EWS tanks are installed, these should include facilities for the FRS to discharge (140/100mm RT outlet) and refill the tank.*" In the event of a fire involving a BESS unit, one of the primary tactics employed will be	As confirmed by Daniel Moss during ISH 3, LFR are satisfied that the Applicant is complying with NFCC water supply guidelines at the indicative design stage of the Scheme. This is the minimum volume of water that should be included for indicative design purposes. The C7.9_Outline Battery Storage Management Plan Revision A (OBSSMP) is secured by Requirement 6 in Schedule 2 to C3.1_E draft Development Consent Order [EN010133/EX3/C3.1_E] provided at Deadline 3. As outlined in the C7.9_Outline Battery Storage Management Plan Revision A (OBSSMP) [REP2-030] -submitted at deadline two; BESS design and site layout should minimise the requirement for direct Fire and Rescue Service (FRS) intervention in a thermal runaway incident i.e. direct hose streams or spray directly on BESS battery systems. LFR intervention in worst case scenarios will ideally be limited to boundary cooling of adjacent BESS and ESS units to prevent the fire from spreading. This strategy will be finalised with the LFR and be

ExQ	Respondent	Question	Response	Applicant's Comment
			to prevent further unit to unit fire spread. Suitable access for firefighters to operate unimpeded between units will therefore be required. This should allow for the laying and movement of hose lines and, as such, access should be free of restrictions and obstacles. The presence of High Voltage DC Electrical Systems is a risk and their location should be identified. Exclusion zones should be identified. A standard minimum spacing between units of 6 metres is suggested unless suitable design features can be introduced to reduce that spacing. If reducing distances a clear, evidence based, case for the reduction should be shown. Any reduction in this separation distance should be design based by a competent fire engineer. There should be consideration for the fire separation internally and the total realistic load of fire. Proposed distances should be based on radiant heat flux (output) as an ignition source. LFR does not support the stacking of containers/units on top of one another on the basis of the level of risk in relation to fire loading, potential fire spread, and restrictions on access.	clearly communicated in the Emergency Response Plan (ERP) within the final BSSMP, as secured by the DCO. Indicative site design plans have been shared and agreed with LFR, as outlined in the OBSSMP at the detailed design stage equipment spacing will be based upon significant scale fire and explosion testing (evidence based). Site layout will allow for LFR to safely manoeuvre fire hoses within the BESS area should they be required. At the detailed design stage, LFR will be able to view the selected BESS system fire test data and an independent Fire Protection Engineer will validate the final water supply requirements and this will be fully agreed with LFR. A BESS design which may require direct LFR firefighting engagement tactics will not be selected for this facility. The C7.9_Outline Battery Storage Management Plan Revision B submitted at Deadline 3 has been updated to reflect further discussions with LFR.
14. Compulsory Acquisition and related matters				

ExQ	Respondent	Question	Response	Applicant's Comment
1.14.3	Network Rail	Please explain how the proposed acquisition of new rights/ restrictive covenants over plot numbers 02-042, 16-320 and 16-372 would affect Network Rail's undertaking.	The proposed acquisition of the new rights/restrictive covenants is a particular concern for Network Rail due to the potential structural impacts that the acquisitions may have. The selected plots are located over railway tracks and propose the creation of rights/restrictions for the purposes of allowing the Applicant to lay electric cables beneath these areas. Railways operate with a complex system of electrical wires and apparatus, some of which are located under the ground, meaning that these works and associated rights could interfere with existing apparatus. These rights could impact Network Rail's ability to provide transport services in these areas as the works may require trains to reroute to avoid the works, or alternatively close the affected sections. Additionally, by granting rights over these areas it could impede Network Rail's access to these sites for the purposes of maintenance to the tracks and associated apparatus (again hampering the ability to deliver services) as	Technical clearance has been issued by Network Rail in respect of the crossings required for the Scheme. The Applicant is working with Network Rail on property agreements and protective provisions to allow for safe installation of the cables under the railway at the identified points. An update regarding these discussions can be found in C8.1.13_A Schedule of Progress regarding Protective Provisions and Statutory Undertakers Revision A [REP2-044].

ExQ	Respondent	Question	Response	Applicant's Comment
			access could be restricted while the works are carried out. Network Rail has a duty under its undertaking to ensure the safe and efficient running of the railway, and it requires the necessary protections to be in place to enable any works that may interfere or interact with the railway. Please note that we assume the reference to plot 16-372 should refer to plot 18-372 as Network Rail does not have an interest in plot 16-372.	

3 Applicant's Responses to other Deadline 2 Submissions

Sturton by Stow Parish Council [REP2-077 and REP2-078] - Link1 and Link 2

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Sturton by Stow Parish Council request that where 'other available land' may be referred to for each land owner to carry out agricultural activities elsewhere; is the other available land being used for agricultural purposes or is it potentially earmarked for use by other solar projects?	The Applicant does not have control or knowledge over what landowners may choose to do in the future on land not subject to an option agreement for the Scheme. Information regarding the landowners' farming circumstances can be found in C6.2.19_A ES Chapter 19 Soils and Agriculture Revision A [REP-010].
			During the hearing in August, Sturton by Stow Parish Council asked why the entire hedgerow along Thorpe Lane to Thorpe Bridge needed to be removed. Mr Cridland directed the applicant to respond directly to Parish Council. We have not received any response. The above map shows blue dots, which when the map legend is consulted say "object within array". Clearly the blue dots along Thorpe Lane are not within any array. The document ENO10133-001046-C.7.17-A Crossing Schedule_Rev A has numerous grid references which although mark points on	The Applicant confirms with regards to existing trees and hedgerows that: 1 The LVIA's intention is to retain and enhance trees and hedgerows and C7.3 Outline Landscape and Ecological Management Plan B [REP2-026] 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 is proportionally set out but in certain locations where existing access points do not exist some minor hedgerow works (pruning and removal) is required, as

			the map do not state whether the hedgerows or trees are to be removed. Object 1154 is a footpath sign? Object 1155 does not signify apart from it's the middle of the road? Object 1156 main drain outfall? C8.1.10 Applicants Responses to Procedural Deadline A; Page 45; response to Sturton by Stow Parish Council WR states that hedgerow removal and tree removal should not be necessary but then points the reader to yet another document. Would it have been easier to just explain yes or no and meterage? Case in point – there is no need for access roads between fields at this point since the fields each side of Thorpe Lane (western side of Thorpe Bridge) are not within the boundary of the project. Therefore, the question still stands; Why is this particular piece of road subject to being within the boundary of the dDCO? There are now 751 documents attached to this application. How many cross references do IP's have to find and check?	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. The Applicant is not proposing to remove the entirety of the hedgerow along Thorpe Lane to Thorpe Bridge. However, some pruning and removal works may be required to facilitate access for construction vehicles. At the detailed design stage 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 A (Figures 8.16.1_A to 8.16.10_A) [REP-024 to REP-034]. The landscape and ecological mitigation plan is secured by Requirement 7 of the C3.1_E draft Development Consent

			2. Could the applicant state specifically where, when and how carbon reduction is foreseen to be achieved? The blanket use of gas reduction comparisons is not helpful. 3. How much generating capacity is already being curtailed by existing solar and wind providers? Why would more solar and wind be useful when curtailment is already being necessary? 4. How much of the arable land to be used by this project and concurrently with the other projects of Gate Burton, Tillbridge Solar and West Burton is currently used for rotational renewable crops? What will the cumulative effect be on this established renewable form of generation. How much tonnage of renewable crops will no longer be available? 5. Land proposed for Cottam 1 was significantly flooded along with the surrounding areas. Is the applicant aware that the term 'negligible' in response to flooding is incorrect for the land along River Till? 6. Some of the land owners are said to farm additional parcels of land outside of the	Order Version E [EN010133/EX3/C3.1_E] (provided at Deadline 3). 2. The Carbon Reduction Calculations are based on the CO_2e generation within the UK Government's GHG Conversion Factors for Company Reporting, representative of baseline CO_2e/kWh as of 2022 based on the offset with providing the same electricity generation by renewable sources. The UK currently generates 43.1% of its power through renewable energy sources according to the National Grid. However, a crucial part of the Net Zero Strategy is to reach 100% zero-carbon generation, much of which is expected to come from renewable energy. 3. It is important to put in context, the current reasons for curtailment in the UK, and the prices paid to generators to curtail. Currently, curtailment is experienced on the UK's large-scale wind fleet. Much of this is due to transmission constraints: the transmission wires between the asset, where energy is generated, and the major points of consumption, do not always have the capacity to transmit all of the generation at times of very high wind. In the 12 months starting 1st

			Cottam scheme. How many land owners have their additional parcels and land within the other nearby schemes? Sturton by Stow Parish Council also request to attend any and all future hearings for Cottam Solar.	October 2022 and ending 30th September 2023, National Grid data records metered wind to be 63TWh. Constraints due to location totalled 3.3TWh (5% of net generation) and constraints due simply to there being 'too much wind energy on the system' totalled 0.6TWh, or less than 1% of net generation. Chapter 9 of C7.11 Statement of Need [APP-350] describes that the Scheme proposes to connect to a well connected section of the NETS which has available transmission capacity and is unlikely to cause the scheme to be curtailed due to location. In the event that the Scheme was required to curtail, the inclusion of a BESS as part of the Scheme provides additional tools to the operator to store any excess generation for dispatch to the system when it is needed. UK solar is not curtailed due to grid actions. It is possible that local constraints may have been imposed on some smaller sites from time to time, due to where they are located, but this data is not available and is not related to there being too much generation on the national electricity transmission system. Some solar generators may have stopped exporting

				during negative price periods. The UK Day Ahead price went negative during the peak solar hours on just three occasions in the summer of 2023: on 2nd, 15th and 16th July 2023. There were no negative price periods in peak solar hours in the summer of 2022 therefore it is highly unlikely that any solar sites self-curtailed during summer 2022. Section 7.1 of C7.11 Statement of Need [APP-350] describes that, according to Government's Energy White Paper (2020), meeting a possible doubling of electricity demand by 2050 "would require a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our Net Zero target." Figure 7-2 of the Statement of Need [APP-350] shows National Grid's projections of installed generation capacity in the UK by 2030 and 2050. Not only is renewable generation capacity expected to increase between now and 2030, but so is flexible capacity (shown as orange in that Figure). A significant increase in UK electricity generation capacity is required to meet

				growing demand and deliver security of supply under different weather conditions. Because the weather is uncontrollable, more capacity is needed to ensure that demand can be met even when renewable output is low. Put simply, without the build out of large capacities of renewable generation, the UK may not be able to meet demand at times of low renewable output, potentially causing: •Power cuts (contrary to Government's aim to ensure security of supply) •Price spikes (contrary to Government's aim to shield consumers from volatile energy markets), and/or •Stand-by fossil fuel assets to generate (contrary to Government's aim to decarbonise the electricity system by 2035) The alternative approach, i.e. building out large capacities of renewable generation, meets Government's aims and provides opportunities for market approaches to manage curtailment if it occurs, and:

				•Use curtailed energy to support security of supply when demand is high •Keep consumer costs down by capturing and storing energy when it is abundant (therefore cheap) and releasing it when it is needed •Displace stand-by fossil assets by using stored energy as a low-carbon "peaking" energy resource, further supporting Government's aim for the electricity system to be operating with net zero carbon emissions from 2035. 4. Growing of energy crops on arable land requires a significantly greater area of land per MWh than solar. The most productive energy crops are miscanthus and short rotation coppice, both of which are perennial crops that typically occupy the land for a period of decades and require over an order of magnitude more land per unit of energy generation than solar. The most common energy crops on arable land in England are whole crop maize and sugar beet for Anaerobic Digester substrate. These are late harvest crops where wet land is vulnerable to structural degradation, in contrast to the recovery of soil health that can be secured with the fallow period within a solar farm.

				5. The Flood Risk at each site within the scheme is assessed within the wider C6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-090] and supporting Annexes. Annexes C6.3.10.3 ES Appendix 10.1 Annex C 10.1.2 Cottam 1 North [APP-092], C6.3.10.4 ES Appendix 10.1 Annex D 10.1.3 Cottam 1 West [APP-093] and C6.3.10.5 ES Appendix 10.1 Annex E 10.1.4 Cottam 1 South [APP-094] assess Cottam 1 specifically. All three sites have identified fluvial flooding but given the nature of the development, the identified flood depths and embedded mitigation described in section 10.7 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045] the risk is assessed as low. 6.This point is dealt with in the response in the box above this one, namely that the Applicant does not have control or knowledge over what landowners will choose to do in future on land not subject to an option agreement for the Scheme.

Marine Management Organisation [REP2-087] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			I have had previous communications with Pinsent Masons LLP (who is acting for the developer on all three projects) with regards to the Gate Burton project and you will likely be aware that the MMO has submitted responses to all deadlines and have maintained our position that unless we are provided anything different from the applicant with regards to the methodology (something that is marine licensable and not covered by an exemption, as is currently the case with the borehole element of the proposed activities) we are of the opinion that a Deemed Marine License is not required and could not be included as part of the dDCO due to the fact that no activities are marine licensable. Having looked at the other two projects, it appears that the methodology and activities are exactly the same as Gate Burton and therefore we are of the same opinion as above for these also, that as there are no marine licensable activities, a deemed Marine License shouldn't be included. I have now	Please refer to the Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 5 submitted at Deadline 3 [**EX3/C8.1.26**].

			seen the first set of Examiners Questions for Cottam Solar which were published yesterday and can see that the MMO has no questions. However, my team will send a response before the deadline, explaining that we will continue to monitor, should anything develop with regards to marine licensable activities. The ExA's third set of written questions of 25th October 23, regarding the Gate Burton project include a question to the applicant, for which we will of course monitor the applicant's response, but it is positive that our position now appears to be fully understood: Q.3.6.1: Article 44 and Schedule 9 Draft Marine Licence: 1) Confirm that the methodology proposed in the draft Marine Licence is the worst-case scenario and explain why other potential scenarios would not be worst case scenarios or would not be used and how this would be controlled or restricted. 2) Given that the Marine Management Organisation (MMO) maintain its position	

			that the matters proposed are covered by an exemption and they do not support the inclusion of a dML in the dDCO there are two options a) remove the provisions; or b) seek to maintain the provisions in the dDCO. Confirm your intentions and if b) provide further justification for the inclusion of the dML including identifying other DCO's where an exemption has applied and a dML has been included in a made DCO. Furthermore, justify each of the suggested conditions in the dML and the basis on which such conclusions are reached.	

Helen Mitchell [REP2-101 and REP2-102] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			I made a submission before the deadline earlier this week, but I have some further information for you and I hope you will accept and take into consideration these images taken this morning during the rainfall.	The Applicant notes this comment.

			In response to section 7: The Water Environment The area around Thorpe Lane, Fleets Road and the River Till has been prone to flooding for as along as I have lived here (since 1987) and many years prior. I have attached two maps showing where I have taken photos of the recent flooding in Thorpe le Fallows on 20th October. These photos were taken in the morning just after 9am and some angles taken again just before 12pm. I became aware of the rain starting in the early hours of 20th October, around 12.40am, so the amount of water collecting in the River Till, surrounding dykes and fields has only happened over a period of 8-9 hours and is continuing to rise. The storm drain in photo ref 2 was installed to help reduce the flooding on the Fleets Road/ Thorpe Lane junction. Many times the bench would almost completely go underwater. As you can see from the photos the drain is still overwhelmed with the amount of water and the water level has risen above the drainage hole in just 3 hours.	The Applicant acknowledges that areas within and adjacent to the Scheme are currently susceptible to surface water flooding. That notwithstanding, the panelled areas are not expected to increase surface water runoff from the Sites as the grassland beneath them still exists and will be brought back to a more natural state than it is currently in. Soil and surface management is considered in section 4.0 and paragraph 5.3.4 of the C6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-090]. Section 6.2.5 of the Assessment notes: "This Flood Risk Assessment demonstrates that the Scheme will not increase flood risk elsewhere and the ground beneath the panels will remain entirely permeable, draining as existing. The development may reduce existing greenfield run-off rates by replacing intensive agricultural surfaces with a landcover comprising a mixture of wildflowers and grassland". The proposed drainage strategy is detailed within Section 5.0 [APP-090] and is secured by Requirement 11 in Schedule 2 of C3.1_E Draft Development Consent Order Version E [EN010133/EX3/C3.1_E] provided at Deadline 3. The panelled areas will not alter the existing surface water run-off regime and will

			You can see water accumulating in the field behind the bench in photo ref 1. The photos taken on Thorpe Lane bend, photo ref 3, show the dyke over flowing onto the road at 09.10am, and by 11.58am the road is no longer visible and is on the way to becoming impassible. I would've liked to have taken some more photos of the river at 12pm to see what the level was after 3 more hours, but I was unsure about making my way through the water on Thorpe Lane bend in photo ref 3 as it had become quite deep. The installation of acres of solar panels and industrialisation and disruption of this landscape is only sure to worsen the risk of flooding. I have also included the flood risk screenshot from the government website that day which shows the expanse of the flooded area around the River Till. I would also like to point out there are no hedgerows along the north side of Thorpe Lane either side of the river. Any solar panels would be 100% visible from this road and any hedgerows planted would take decades to	therefore not be formally drained. Areas of increased hardstanding such as smaller areas of hardstanding formed as footings for electrical infrastructure will utilise sustainable drainage (SuDS) principles and attempt to mimic the existing surface water run-off regime as existing.

			become tall and dense enough to disguise them. Other areas prone to flooding, and which also flooded on 20th October are the crossroads at Bransby, the fields belonging to Bransby horses rescue which run along side the River Till, Sturton by Stow high street, Squires Bridge over the River Till on Broxholme Lane. Bransby fields act as the River Till washlands and water is sent into them to stop the River Witham from flooding Lincoln city at The Brayford Pool in Lincoln which is connected to the River Witham and Foss Dyke (which connects to the River Till at Odder). Pictures attached of Bransby and Brayford Pool. Storm Babet brought unprecedented rainfall to the UK on Friday 20th October. The village of Bransby flooded with surface water, along with more than 40% of the charity's land after the Till Washlands were purposely flooded to protect homes in the city of Lincoln – worse than the damage they experienced in 2019. Information and images from the 2019 flood can be seen here	

			https://bransbyhorses.co.uk/the-floods-of-2019-update/ And information and images of the vast area flooded in 2023 can be seen here https://bransbyhorses.co.uk/emergency-flood-crisis-2023/ I strongly feel I am being wholly disadvantaged throughout this examination process. I work and have young children and it is physically impossible for me to spend the time reading the sheer volume of documentation in order to participate. I don't have a computer at home and trying to read these documents on a mobile device is extremely difficult. I attempted to read the Skidmore Review as mentioned in section 3 of your questions as you have asked all IP's to comment, but this document is 340 pages! There are also two other deadlines this week, one yesterday for Gate Burton and one on Friday for West Burton. How the public are expected to keep up with this is beyond me.	

			The whole process is extremely complicated and confusing, made worse by the close and overlapping deadlines of each proposal. What I do know is this cumulative project will cover approximately 16 miles by 8 miles of fields, farmland and wonderful countryside in this area. Every journey I take I will see solar panels. To say that hedges will be planted and that in 15 years time we won't see them is completely lacking any empathy to those of us who live here and will have this blight on our countryside. This will seriously affect the mental health of myself and my family and we do not want it. There are other options for renewable energy. Further to my previous email regarding the flooding currently happening around Thorpe Lane/ Thorpe le Fallows near the River Till, please see attached screenshot of a map found on the government website showing the flood alert for the River Till. I have now heard via social media that the River Till has come over the banks on Ingham	

			Road, which can be seen in the central area of the map, and is another location proposed for solar panels.	

7000 Acres - Supplement to Cottam REP-117 [The role of Solar in Energy Provision and Decarbonisation], reviewing progress towards decarbonisation and the role of solar [REP2-090] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Three major reports have been published this year that assess the decarbonization of the power sector in the UK and current progress towards delivering on that goal. In doing so, they describe the main challenges and the extent to which solar plays a role. These reports are: • Delivering a reliable decarbonised power system, by the UK Climate Change Committee (CCC), March 2023 • Decarbonising the power sector, by the National Audit Office (NAO), March 2023 • Decarbonisation of the power sector, by the Business, Energy and Industrial Strategy Committee (BEIS), April 2023 – Note: the energy portfolio of this department is now	The Applicant addressed, at Deadline 2, the ExA's FWQ1.3.5 request for comment and response to 7000 Acre's REP-117 C8 1.15 Applicant Response to ExA First Written Questions [REP2-034]. The key points made in answer to FWQ1.3.5 which are relevant to this representation are: • Section 3.3 of C7.11 Statement of Need [APP-350] describes the UK Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".

			the responsibility of the Department for Energy and Net Zero (DESNZ) In all of the above, while there are clear concerns raised regarding the UK's current path to decarbonization, within the details, it is notable that solar is not central to any key recommendations to address the situation in any of the reports. Conclusions: It is clear that in order to decarbonise, the UK faces many challenges, among which those most pressing concerns are: • The need for overall co-ordination and planning of the energy system • The resolution of grid connectivity issues – especially to deliver offshore wind generation • Inadequate pace of deployment of wind and nuclear power generation • The need to manage energy flexibility and intermittency of renewable energy sources While solar has its part to play, it features very little in the landscape of key challenges to be overcome for the UK to make a success of decarbonising the power sector, and	• 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" • The November 2023 Revised National Policy Statements for Energy reiterate the need for solar development and the Government's national ambition of 70GW by 2035 (NPS EN-3 (November 2023), Para 2.10.10, and once designated will categorise large-scale (>50MW) solar schemes, which due to their size will need to be ground mounted, as Critical National Priority (CNP) Infrastructure, due to

			existing rates of deployment do not appear to be a concern, thereby undermining the call by Applicants for extensive acceleration of solar deployment through large-scale ground mounted solar. However, uncoordinated deployment of solar has the potential to interfere with efficient and effective decarbonisation by: • Exacerbating issues of excess renewable supply and curtailment, thereby increasing the net cost of a decarbonised energy system. • Competing for land that will be required for direct decarbonisation measures, through tree planting and restoration of peatlands. • Providing additional "clutter" to an already overwhelmed queue of grid connection applications. • Diverting skilled resources away from delivering on the key priority tasks for decarbonisation, e.g. offshore wind, new nuclear, carbon capture. It is therefore essential that there is a clear plan for the deployment of solar to deliver the Government ambition for 70GW of solar,	"the urgent need … to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits" associated with such schemes (NPS EN-1 (November 2023), Para 3.3.63. • Large-scale ground mount solar enjoys strong policy support. The Applicant's comments in relation to 1.3.1 (7000 Acres) response included above is also relevant. Chapter 9 of C7.11 Statement of Need [APP-350] describes that the Scheme proposes to connect to a well connected section of the NETS which has available transmission capacity and is unlikely to cause the scheme to be curtailed due to location. In the event that the Scheme was required to curtail, the inclusion of a BESS as part of the Scheme provides additional tools to the operator to store any excess generation for dispatch to the system when it is needed. Further, the proposed grid connection point is not available for offshore wind, and therefore is unlikely to slow down other priority tasks

			as has been recommended by Chris Skidmore's report, and as has been accepted by Government. In the absence of such a plan, the Applicant seeks to gain from the uncoordinated situation in the UK with regard to decarbonization, and in so doing lock in long-term contracts that will back an infrastructure investment that may well be a source of future regret. In submissions to the Examining Authority, the Applicant repeatedly conflates the urgent need for decarbonization with the urgent need for their large-scale ground mounted solar project. While there is an urgent need to decarbonize, it is clear that solar will play a limited role in resolving the key issues required to decarbonize the UK power sector – something that must be fully considered when weighing up the significant impacts of large-scale ground mounted solar schemes.	towards decarbonisation of the UK electricity market. The Climate Change Committee's June 2023 Progress Report to Parliament has two key messages. The first is "A lack of urgency. While the policy framework has continued to develop over the past year… there remains a lack of urgency over its delivery" and the second is to "Stay firm on existing commitments and move to delivery. The Government has made a number of strong commitments, notably … the 2035 decarbonisation of the electricity system … These must be restated and moved as swiftly as possible towards delivery" (both p14) and on p22 of the same report, the CCC state that: "Renewable electricity capacity increased in 2022, but not at the rate required to meet the Government's stretching targets, particularly for solar deployment. 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 a need to accelerate deployment, consistent with Government's view described above.

7000 Acres- Supplement to REP-110 [Flooding Concerns] [REP2-091] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			• The following images demonstrate the extent of flooding following storm Babet (18-21 October 2023). • Given the extent to which more extreme rainfall is anticipated, the rate at which this flows over the land must be considered. • The creation of a significant area of tilted impermeable glass surface would concentrate and accelerate run-off, and would inevitably will exacerbate flooding impacts.	Please refer to the response in this document to Helen Mitchell REP2-102. The Applicant acknowledges that areas within and adjacent to the Scheme are currently susceptible to surface water flooding. That notwithstanding, the panelled areas are not expected to increase surface water runoff from the Sites as the grassland beneath them still exists and will be brought back to a more natural state than it is currently in. Soil and surface management is considered in section 4.0 and paragraph 5.3.4 of the C6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-090]. The proposed drainage strategy is detailed within Section 5.0 [APP-090]. It is considered that the panelled areas will not alter the existing surface water run-off regime and will therefore not be formally drained. Areas of increased hardstanding such as smaller areas of hardstanding formed as footings for electrical infrastructure will utilise sustainable drainage (SuDS) principles and attempt to mimic the existing surface water run-off regime as existing.

7000 Acres - Response to Applicant's Responses to OFH and Relevant Representations [REP2-092] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			As a general observation, the Applicant has chosen to recycle answers and cross-reference to sections of their documentation, rather than engage in answering points raised. For instance, in relation to Energy Need and the potential for rooftop solar to meet this need, the Applicant has answered this by referring to various sections of APP-350, the Statement of Need, restating their conclusion that there "on their own, brownfield developments are unlikely to be able to meet the national need for solar". This does not address the points raised by 7000Acres, that commercial and domestic rooftop solar can make a significant contribution, as evidenced by reports from Ecotricity and the Warehouse Association. These, along with smaller scale ground mounted schemes, rendering the need for such schemes as Cottam unnecessary. This topic is described in more detail in 7000Acres REP-117	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 achieve 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. 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

			7000Acres raised the issue of "curtailment" – where energy is wasted when there is too much electricity generation for the demand and highlighted the need for flexible generation. In their response, the Applicant has simply restated the need for low carbon generation and not addressed the issue raised. The Applicant has continued with this approach in other areas, such as security of supply, efficiency of land use, displacement of food and energy crops.	(rooftop, and ground mount) and concludes by considering that "there is a strong need for increased solar deployment" See also the Applicant's comments to 1.3.2 Dorne Johnson response made previously in this document. The Applicant has made a detailed submission on curtailment, which provides more insight into the data sources cited by 7000 Acres, how and why renewable energy is currently curtailed, and makes observations about future curtailment. Please refer to the Applicant's comments on ExQ 1.3.2 MJ Dover response above.
	Socio-Economics, Tourism and Recreation Human Health	Health and Wellbeing impacts	7000 Acres response to Cottam Response to the Relevant Representations 7A-06 Health and Wellbeing The applicant has failed to understand the importance of open green spaces as being beneficial to people's mental and physical health as well as their wellbeing. People choose to live and work in rural areas to gain benefit from what the open countryside and its environment has to offer. Building new hedgerows, trees to hide the solar panels (4.5metres high), placing panels 15 metres away from Public Rights of Way and	Please refer to document C8.1.18 The Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 2 [REP2-050] where the Applicant has addressed 7000 Acres' comments on these matters. The Applicant also directs 7000 Acres 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

			bridleways in no way mitigates against the open space and current landscape which has been present for many years. Nothing will strengthen field boundaries which already exist and which we accept as normal. The strengthening of field boundaries will be metal palisade fences! This will have an impact on the people! This scheme offers no benefit to the community, the tourists, visiting walkers, local residents, ornithologists and cyclists. In fact, it does quite the opposite as who would want to visit a countryside that has been industrialised! For the locals, this scheme will fragment our society, marginalise further those areas that are already deprived, create outward migration of young people, leaving the older and vulnerable to become more isolated, lonely, and future issues around social care provision. There are considerable higher rates of pensioners living in our community who are single. Ultimately, this has the potential to widen health inequalities which have not been addressed by the applicant.	consultees had additional opportunity to comment on the assessment scope and methodology on socio-economics, tourism, recreation, human health and wellbeing impacts through the Section 42 Statutory Consultation. Please refer to C5.11 Consultation Report Appendix – Section 42 Applicant Response [APP-034]. –. 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 examined and determined.

			In response to health and wellbeing, the applicant has only concentrated on the cumulative effect to access, desirability and use of recreational facilities being anticipated during construction, which they regard is short term. They refer to table 18.2 (APP-053), where health and wellbeing is considered around "fear and intimidation from HGV traffic on highways used by workers, cyclists and horse riders, as well diversion closures (nuisance factor) or access impacts to Public Right of Way". This is not what health and wellbeing is all about! What the applicant fails to identify is the forty year gap this scheme will have on the people who live and work in the area affected. They reference as per table 18.2 (APP-053), by stating that no significant adverse effects to socio-demographic and human health indicators. How do they know? Where is the up-to-date local Public Health intelligence? There is a requirement for a HEAT (Health Equity Assessment Tool) to be completed. This is a Public Health England tool to assess for potential health inequalities.	

			Where is the up-to-date NHS Integrated Care Board health intelligence? Where is the Qualitative data following a well-informed public consultation, indicating how people feel emotionally, physically and mentally? How will this impact on the NHS Core20PLUS 5 programme around health inequalities? Merely doing a desktop review on health is insufficient. We therefore request that a thorough Health Impact Assessment be carried out, and in particular to draw attention to the impact this and the cumulative impact of the other schemes will have over the next 40-60 years. Please refer to the Written Representation 7000Acres on Human Health and Wellbeing	

7000 Acres - Cottam deadline 2 Comments on Submissions for Deadline 1 [REP2-093] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			The document AS-037 dated May 2023 has not been responded to by the applicant and the Statement of Reasons has not been	Regarding submission reference [AS-037] and Tillside Limited, the Applicant refers to response 7A3-01 in its Responses to

			updated as required to be submitted for Deadline 1. The related updates to the Book of Reference have also not been carried out. The applicant is reminded that Tillside Limited was registered as a Limited Company on 8 March 2022 over one year after the Option Agreement dated 19th February 2021 referred to in the Book of Reference and the Statement of Reasons. Therefore this agreement cannot be valid. Pinsent Masons should have advised their client against this type of potentially fraudulent activity.	Procedural Deadline A and Additional Submissions [REP-056]. In addition, the Applicant responded to comments made on the same point by 7,000 Acres at Compulsory Acquisition Hearing 1 on 7 December 2023. Please see the Written Summary of the Applicant's Oral Submissions at the Compulsory Acquisition Hearing 1 [EX3/C8.1.24] at agenda item 6.

Tracy Adderley [REP2-096] and Julian Plews [REP2-105] - Link and Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			I strongly object to the Cottam solar farm proposal. It is just 1 of 4 Solar, Nationally Significant Infrastructure Projects (NSIPs) within a few miles of each other and together these would create the largest solar farm complex in Europe, amounting to some	Solar is efficient in the UK See the Applicant's response to Dorne Johnson in 1.3.1 above. Low / zero contribution of nuclear in 2020s

			10,000 acres in total. We must look at all 4 of the proposals together rather than independently given the scale of the projects. The submission of all these projects together, the documentation involved and the timetables for them makes it impossible for the people affected by the plans to fight them all at once. The Cottamn Solar proposal, at over 3,000 acres, combined with the other 3 proposals have a cumulative effect of 10,000 acres of farmland lost and the industrialisation of the area as a whole. Food security is now a big issue and the government is changing its stance, wanting more productive farmland, not less (see the Government Food Strategy document June 2022). Over the previous 40 years we have gone from producing 78% of our own food down to 64% and the cost of importing food is increasing all the time. To lose 10,000 acres (in total) of good arable land is ridiculous. Rishi Sunak says those fields should be bulging with "fantastic produce" and we must "not lose swathes of our best farmland to solar farms". Jeremy Hunt is pushing to speed up planning permission for nuclear power plants and offshore wind to boost growth	See the Applicant's response to Dorne Johnson in 1.3.1 above Brownfield and rooftop solar are unlikely to meet the need See the Applicant's response to Dorne Johnson in 1.3.2 above Security of supply is important not only during winter peaks See the Applicant's response to Dorne Johnson in 1.3.1 above Food Security – DEFA reports on UK wide food security issues. The most recent report was in 2021. It notes that UK food self sufficiency has remained stable for over two decades. Land use change in the UK is not identified as a risk to UK food security. Both climate change and soil degradation are identified as risks to UK food security. Temporary solar farms on arable land help secure recovery of soil health as well as addressing climate change.

			and bring down energy bills. In the UK, solar panels produce on average around 11% of their rated output – and they produce most of that power on sunny, summer days when we least need it. When demand is at its highest, on winter evenings, they produce nothing at all. The government has just approved Sizewell C . Nuclear is the only form of reliable, low carbon electricity generation which has been proven at scale and returns more than 100 times as much power as a solar site of the same size. This will increase civil nuclear power to up to 24GW by 2050 – 3 times more than now and representing up to 25% of projected electricity demand. Solar farms should be located on brownfield sites, not greenfield, and solar panels be compulsory on all new build commercial and residential buildings. Solar farms will destroy agricultural jobs, skills and livelihoods and create very few new skilled jobs or replace livelihoods. Most of the equipment is likely to be manufactured in China and non-local labour used in construction. It is likely there will be a likely	Construction traffic impacts Please refer to the response to RR-471 in C8.1.2 The Applicant's Responses to Relevant Representations [REP-049] where this topic is covered in detail.

			net reduction in employment, in an area with relatively few opportunities. Tourism to the area will be devastated and businesses ruined. There will not be any economic benefit to the communities affected. It seems to me that Lincolnshire has been chosen because it is one of the least populated counties and therefore fewer objections will be raised against projects like this and small rural villages and hamlets will be swamped by industrialisation – the county will be ruined forever. No matter what precautions and assurances, it will not be possible to deliver and install millions of solar panels, pour thousands of tonnes of concrete, as well as containers with batteries and switchgear, all surrounded by miles of fencing, without damaging habitat. And this construction would take between 5 to 7 years to complete. Furthermore, it is my understanding (from The Times) that the life span of solar panels is about 20 years so they will need replacing at least twice and the old ones will need recycling (by who?) or just scrapped (where?). After what now appears to be 60 years how will all the panels be	

			removed? How will the concrete bases be dug up and where will it all be dumped? Does anyone really believe that after 60 years the fields will be viable as agricultural food producing land - they will be lost for further generations to come. Much of the construction traffic will still be using single track country lanes which are already in a poor condition. It also raises concerns over the risks to pedestrians, cyclists, horses, wildlife and other traffic. The cumulative scale of the development is unprecedented, and the impact of such a development would change the character and nature of the area for 60 years or more, such a change has the potential to have a significant detrimental impact on the general health and wellbeing of residents. On this site alone there would be 3,000 acres of solar panels which would change the landscape totally and would destroy the scenic beauty of the area. I strongly urge that this proposal be rejected.	

Mr S Booth and Mrs C Booth [REP2-097] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Regarding the blind entrance/exit from West Farm Cottages and the development of West Farm Barns - possible use of land behind West Farm Cottages, in front of West Farm Barns to house offices and machinery compound. Further to our earlier submission, we wish to add the following photos of the visibility from the exit onto the B1241 main road with a 60mph speed limit. As we have previously stated, the track is one vehicle width and as you can see from the photos, it is a blind exit when approaching from the north at the bend, and due to the curve in the road, visability is poor from the south. Should traffic have to wait on the road whist vehicles leave, it will cause a danger to all drivers, not only the ones waiting to turn, but others approaching at speed on the main road. Also the entrance to the field cuts across both of West Farm Cottages driveways - this itself causing further risk to ourselves and visitors/deliveries etc. Why has this land at Normanby by Stow potentially been selected for this purpose when there is	The Change Application [EN010133/CR1/C9.2] proposes that the accesses at West Farm Cottages are no longer required and the Cable Route Corridor is proposed to be relocated further south. The Change Application is currently being considered for acceptance by the Examining Authority. 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 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/EX2/C6.3.14.2_B] to ensure the safety of all road users. The Construction Traffic Management Plan is secured by Requirement 15 in Schedule 2 of the C3.1_E Draft Development Consent Order Version E

			plenty of other land within the development scheme which has better access and less of a hazard to all concerned, and is not in very close proximity to 2 existing houses and 2 more being developed	[EN010133/EX3/C3.1_E] (provided at Deadline 3).

Mrs Susan Round [REP2-106] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			I am strongly opposed to this application as it is taking food growing land out of production in addition to being a part of an a mega solar farm development industrialising Lincolnshire land	The Applicant notes this comment. The Applicant does not consider that the Scheme would result in adverse food security impacts either alone or cumulatively. The UK annual balance of domestically produced food is sensitive to non-planning factors including weather and markets. The relevant assessment for policy purposes (and therefore decision-making purposes under the Planning Act 2008) is one that is based on the grade of the agricultural land, rather than its current use and the intensity of that use. As such, it should be noted that the site is predominantly ALC Grade 3b, not "best and most versatile" agricultural land (see para 19.8.5 of C6.2.19_A ES Chapter 19 Soils and

				Agriculture Revision A [EN010133/EX1/C6.2.19_A]). Paragraphs 8.5.1-10 of C7.11 Statement of Need [APP-350] express agreement with the UK Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. The Applicant therefore supports Government's position that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.

Historic England [REP2-082 and REP2-083] - Link 1 and Link 2

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
	Cultural Heritage	Thorpe mediaeval settlement	The representation consists of the Historic England list entry for Thorpe medieval settlement Scheduled Monument, List Entry 1016978, and an extract from 1st edition Ordnance Survey 1:2500 mapping 1886, showing a former field boundary.	See response to REP-095 in [REP2-048] The Applicants Responses to Written Representations Part 1.

Tracey Peden [REP2-104] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Having grown up in the countryside of Glentworth and the surrounding area I am absolutely mortified that your company is preparing to ruin the landscape and wildlife for future generations. And on such a massive scale!!!! I'm so sad that you aren't thinking of using far more suitable sites to put your industrial solar monstrosities. Why not use Kirton Lindsay old raf/army site? Hemswell airfield. Scampton? So many other choices that already exist. Not on good agricultural farmland. Please reconsider what your options are and think of future generations and your grand children. We as a country have found already that we rely on grain from around the world and yet you're going to destroy so so much farmland that feeds so many. With a heavy heart and praying common sense prevails	The Applicant notes this comment. Paragraph 8.5.10 and Section 8.5 more generally of C7.11 Statement of Need [APP-350] describe and express agreement with the Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. The Applicant therefore supports the Government's view that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation. The basis on which the Applicant has selected the Sites accords with the approach to the consideration of alternatives set out by paragraph 4.4.3 of NPS EN-1. The consideration of alternatives has been undertaken within C6.2.5 ES Chapter 5 Alternatives and Design Evolution [APP-040] and its accompanying appendix C6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-067]. Paragraphs 3.2.14 to 3.2.17 of C6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-067] summarise the assessment of the former RAF Scampton site. The assessment

				results for the Scheme are compared against RAF Scampton and other potential development areas at Annex E of [APP-067]. The Scheme is anticipated to result in a substantial net gain for biodiversity (see C6.3.9.12 ES Appendix 9.12 Biodiversity Net Gain Report [APP-089]), predominantly through the creation of extensive low-input grassland resulting in a net gain of 96.09% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 10.69% in river units, and the planting of several kilometres of species-rich hedgerow resulting in a net gain of 70.22% in hedgerow units. Requirement 9, which is secured by Schedule 2 of the C3.1_E draft Development Consent Order Version E [EN010133/EX3/C3.1_E] (provided at Deadline 3) provides that "No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body." Section 9.7 of C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044] sets out the extensive findings of all ecological

				investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. A comprehensive package of mitigation measures has been identified, in tandem with embedded mitigation (see Section 9.7) established through the ecologically sensitive design of the Scheme (such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses). These measures are further detailed within C7.19 Outline Ecological Protection and Mitigation Strategy [APP-356] (as secured by Requirement 8 of Schedule 2 of C3.1_E draft Development Consent Order Version E [EN010133/EX3/C3.1_E] (provided at Deadline 3)) and C7.3_A Outline Landscape and Ecological Management Plan [EN010133/EX1/C7.3_A] (as secured by Requirement 7 of Schedule 2 to C3.1_E Draft Development Consent Order Revision E [EN010133/EX3/C3.1_E] provided at Deadline 3) which will ensure that all identified impacts are minimised as far as possible. In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about

				beneficial effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit.

LNT Group / LNT Aviation / Blyton Park Driving Centre [REP2-085] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Representation Submitted by LNT Group/Aviation & Blyton Park Driving Centre March 2023 Thank you for your letter dated 15 February 2023 addressed to The Secretary of LNT Aviation Limited advising of the above application for a Development Consent Order to build a solar and energy storage project comprising Cottam 1, 2, 3a and 3b : Four Solar Array sites. It is understood that the application for a Development Consent Order has been accepted for examination by the Planning Inspectorate (PINS) and relates to what has been classified as a Nationally Significant Infrastructure Project (NSIP). Furthermore, it	The impacts of glint and glare from the proposed development upon road receptors along Kirkton Road have been assessed. No significant impacts have been predicted along this section of assessed road, which runs adjacent to the Driving centre. See Section 7.2 of C6.3.16.1 ES Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-140]. As explained at the Compulsory Acquisition Hearing on 7 December 2023 (see the Written Summary of the Applicant's Oral Submissions at Compulsory Acquisition Hearing 1 submitted at Deadline 3 [**EX3/C8.1.24**]), the Applicant is in discussions with the Blyton Park Driving Centre. The Applicant is confident that the Scheme and the ongoing

			is understood that LNT Aviation Limited has been identified as a prescribed body and/or a person with an interest in Land (PIL) for the purposes of Section 56 of the Act and/or Regulation 16 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. LNT Aviation Limited – is part of the LNT Group of Companies – including Ginetta Cars Ltd, which are owners and operators of Blyton Park Driving Centre, off Kirton Road, to the north east of Blyton Village, immediately to the north of the area referred to within the application as Cottam 3a. Blyton Park Driving Centre: • Blyton Park Driving Centre is a long established Driving Centre utilising the former runways of RAF Blyton, since as long ago as the 1950's • The Driving Centre usage was formally established in the early 1990's and has developed in this location over a long period of years. o It currently accommodates a thriving business enterprise with an almost	operation of the Blyton Park Driving Centre can safely co-exist and is reviewing the design and proposed mitigation for the Scheme in light of the concerns raised. Further details will be provided at Deadline 4.

			full calendar of driving events and motor sports activity, all year round. • It is used for driver training; research and development as a well as multiple recreational driving uses and represents a rare opportunity for such automotive uses. • Planning permission was recently granted by WLDC in March 2022, for development of the Driving Centre as a Automotive Research and Development Centre for new electric vehicle and other automotive technologies. • The development of the Driving Centre was granted on the basis of positive contribution to the local economy and employment generation and as a facility that would attract visitors and additional tourism to the area. Proposed Solar & Energy Storage Project • Prior to receipt of the letter dated 15 February 2023, it is understood that there was no prior consultation with	

			LNT Aviation Limited or the Blyton Park Driving Centre in relation to the proposed Solar project. • It is understood that the area to the south and east of Blyton Park Driving Centre is proposed to accommodate both an extensive and intensive array of ground mounted solar panels • Cottam 3a is proposed to the north of Kirton Road and immediately up to the southern and eastern boundaries of the Driving Centre. • The proposed Solar scheme is intended to cover a significant number of hectares of currently productive agricultural land, attractive countryside and rural landscape. • The solar panels it is proposed to be installed in the form of -Tracking Panels and/or Fixed Panels, the height of which will be up to 4.5m and typically only some 0.4m above the ground.	

			LNT Aviation Ltd/The LNT Group/ Blyton Park Driving Centre wish to STRONGLY OBJECT to the Cottam 3a part of the proposed solar project for the following reasons: - • The detrimental impact on the character and appearance of the countryside and landscape character to the north-east of Blyton Village and as a consequence to the attractive rural character and setting of the well-established Blyton Park Driving Centre business and premises. Notably the Driving Centre has recently been granted planning permission for appropriate development and enhancement, as a Research & Development facility for new Automotive Technologies. • Its likely harmful impact as a consequence of the introduction of such a large array of acoustically reflective surfaces and development, in such close proximity to the long established Driving Centre and Motor Vehicle activity that has been	

			successfully restricted and managed in terms of its acoustic impact, over a long period of years and likely significant adverse impact on the amenity of the occupants of nearby residential properties and the acceptance and viability of the adjacent Driving Centre business and its approved future development. • The impact of glint & glare from the reflective surfaces of such a large array of solar panels in such extremely close proximity to the long established Driving Centre business and motor vehicle activity that will have a significantly detrimental effect in relation to enjoyment of drivers attending the adjacent Driving Centre and most importantly from a health and safety perspective of drivers using the adjacent driving centre and associated circuit, only metres to the north and west of the proposed solar panel arrays. • The likely detrimental impediment on currently unrestricted access to the	

			established Driving Centre business and circuit, of operatives and visitors, that currently benefit from legal rights of access to, off Kirton Road to the Driving Centre, at all times. • The likely harmful effects of strong electromagnetic fields generated as a consequence of the proposed solar panels arrays and associated development, on the users of the adjacent Driving Centre and those taking part in any adjacent motor vehicle activity and in relation to the development of the Driving Centre as a new Research & Development facility for New Automotive technologies, including electric vehicles and autonomous vehicle technology development.	

Katharine McIlroy [REP2-100] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			It is clear that IGP know more about AI and Internet technology than they do agriculture and rural farming communities. Equally	The agricultural land within the Sites is managed by farm businesses that are the owner occupiers of the land. These farm

			farmers know more about farming and food production than endlessly ticking boxes on a computer. As such, this method of deadlines, statements and demands seems unfair and biased. How many farmers have the time to read a 700 page report, let alone download it and respond? In fact these reports need scrutiny as previous reports were erroneous. Solar panels should be on buildings and agricultural land should grow our food, this cannot be overstated. The effect of massive Solar Generating Power Stations on farming and rural communities, their mental and physical health and farming future stability, cannot be overstated. The damage to our already fragile country roads, which frequently flood and close, the "sectioning off" of ancient historical communities cannot be overstated. All the above mentioned, for a poor unreliable end result, since we are a country offering little in the way of regular solar energy at times when it is needed. But the IGP goldrush which began in 2021 is unrelenting.	businesses have chosen to enter land into the proposed development. At present the local road network is used by agricultural machinery including very large vehicles such as combine harvesters, and high axle load vehicles such as grain trailers. During the operational phase of the Scheme, the Scheme will not be generating movements by these very large and heavy agricultural vehicles on local roads. The impact of the Scheme on farming circumstances is described in paragraphs 19.8.15 to 19.8.32 and assessed in paragraphs 19.9.9 to 19.9.11 of C6.2.19_A ES Chapter 19 Soils and Agriculture Revision A [REP-010]. The Scheme's socio-economic impacts have been assessed within C6.2.18 ES Chapter 18_Socio Economics Tourism and Recreation [APP-053]. The Scheme's impacts on human health have been considered within C6.2.21 ES Chapter 21_Other Environmental Matters [APP-056]. The impact of construction traffic on highways has been considered within C6.2.14 ES Chapter 14_Transport and Access [APP-049].

Jeffrey John Summers [REP2-108] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Submission ID: 22494 Ref. Lincolnshire County Councils "review of soils and agricultural land classification for Cottam Solar Project." i am still of a view that grade 3b soils are a very useful component within the agricultural soils classification. Within the lengthy text provided by LCC they talk about soil types from a range of sites across the country and i believe this report should be more specific to the application site. We know the range of clay soils within the designated areas vary in classification. Genuine farmers also know, these soil types require drainage schemes applying. With clear and open drains to remove the water. Schemes which contain a high level of very permeable stone backfill which draws water from the earth into the drainage system are very successful. Such schemes can be effective for as long as 100 years. I note comments about not being able to work the	Grade 3b land has significant and long term limitations on agricultural use, affecting the range of crops that can be grown, yield, consistency of yield and/or the cost of obtaining a crop. The ALC Guidelines (MAFF October 1988) direct that an ALC assessment should be made on the assumption of a good standard of management and illustrate this using drainage as an example. If land is surveyed that can be drained but is not, ALC grade limitations are determined as if an appropriate underdrainage system were installed. The benefit to heavy land of installing field drains has been taken into account in the assessment of ALC Grade at the Sites. Field drains can normally be expected to function for at least 40 years, after which they are routinely renewed. Farmers monitor drain outfalls to identify drains that are running slowly and may require renewal. Some field drains may be due for renewal

			land in winter or run livestock on grass fields due to water logging. Using this as a reason for mounting Solar Panels. NO SEIN FARMER will run livestock on clay / loam soils in the winter creating poaching and destruction of a grass sward. Nor would an attempt be made to sow crops when ground conditions are not fit. Those who do attempt such a ridiculous exercise pay a costly price of a poor / failed crop. Grade 3 soils require a pragmatic approach to crop establishment via an early start to preparing the land in August through suitable cultivation techniques which prepare the soil to take heavy rain and deliver it to water coarses. This method produces heavy cropping which also sustains a moisture content within the soil to support crops in dryer seasons. THE PHOTOGRAPHS IN THE REPORT. The enclosed photographs illustrate extensively the mindless abuse of soils whilst developing a solar array. Creating soil compaction and abuse through the drive to get the job done is irresponsible. This action also creates very serious damage to soils with vehicle ruts 60 cms deep cutting deep into	because of their age, following decommissioning of the solar farm. Mr Summers notes the constraints on land management imposed by higher clay content soils, these include longer closed periods for carrying livestock and a shorter window of opportunity to cultivate land without causing serious and persistent soil structural damage. These constraints are the basis for the soil wetness and workability limitation to ALC Grade 3b that is prevalent in the Sites. Site work will be undertaken according to the Soil Management Plan (SMP), which will be secured in Requirement 19 of Schedule 2 of C3.1_E Draft Development Consent Order Version E [EN010133/EX3/C3.1_E] (provided at Deadline 3). The outline SMP (ES Appendix 19.2, C6.3.19.2 [APP-146]) includes measures to prevent soil disturbance while the material has been wetted to a plastic consistence, pushing most of the construction activity into summer months when soils are driest and least susceptible to structural degradation.

			subsoils and risking damage to land drainage schemes and water coarses. Once the arrays are removed it is suspected much of the land will require a new drainage scheme being applied costing thousands of pounds per acre. A genuine farmers view. Thankyou	

Simon Skelton [REP2-107] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			"Voluntary consultation with individual property owners was undertaken throughout the duration of the Scheme development and the preparation of the ES including discussion over bespoke mitigation relevant to individual properties. A number of meetings and visits to North Farm . The residents of North Farm were then visited by Lanpro on 13 June 2022 to retain engagement and prepare the detailed assessment relating to North Farm, which is set out at C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [APP-	Unabated gas is not consistent with net zero policy See the Applicant's response in 1.3.1 above Low / zero contribution of nuclear in 2020s See the Applicant's response in 1.3.1 above Solar vs. Onshore wind land use Table 7.1 of C-7.11 Statement of Need [APP-350] shows that annual energy generation per hectare is broadly comparable between

			075]. This detailed assessment concludes that the visibility of the panels is mainly focussed from first floor windows of the main farmhouse to the south overlooking Willingham Road. To the south, the panels are offset by at least 240m within a landscape that supports a good network of hedgerows and tree cover, which assist with their integration. Visibility to the north towards the panels is curtailed by existing woodland and to east, the panels are distanced at 870m, with the panels distanced at approximately 380m to the west." The IGP response to my RR concerns I find incorrect and unsympathetic. Home visits were indeed made, and many more emails followed, but IGP did not keep mitigation promises as explained in my WR. The infrastructure to the south would begin on the other side of the lane to my property on highly visible elevated farmland, all our views would consist of a solar landscape. The infrastructure to the North would be only 50m from my property, the woodland mentioned is my own and is an important	solar vs. onshore wind. The environmental effects of solar are also generally lower than those associated with onshore wind. Landscape and Visual: Potential visibility to the south, north and east of the property. Please refer to ES Chapter 8 Landscape and Visual Impact Assessment Revision A [REP2-008] specifically ES Appendix 8.3 Potential Visual Effects Revision A [REP2-012] that has taken account of the visual impact of the solar panels/arrays and explored all options and mitigation for minimising any effects. This has included North Farm (assessment sheet C6.3.8.3.3.2.5), particularly where the main areas of visibility are focussed to the south and east. This mitigation has included consideration of the existing vegetation and where new planting will help supplement the tree cover in the hedgerows. Where hedgerows have previously been managed to create low, neat field boundaries, these are to be allowed to grow out (particularly along Willingham Road) and managed to a height of 5m with the addition of irregularly spaced hedgerow trees to help boost this overall. Furthermore, the Scheme provides the scope

			and well used area, not mitigation for an industrial development. The panels to the East would be an acceptable distance away but the ones to the West would have no screening and would dominate the landscape, new planting would take an unacceptable length of time to mature and have limited or negative effects at such as view blocking and loss of character. As stated in my WR, we are reasonable people that have been treated unfairly by the solar developer. This poorly planned scheme would totally surround us with its undeniable visual blight. I wish to remain living in the countryside and in the family home that I built, not in a house isolated by solar panels in all directions… who would? This shows corporate disregard for residents, even those willing to cooperate. I look forward to the site visit, to show the overwhelming nature of the proposal. "Deliver a large amount of renewable generation capacity (35,590,658 MWh over the estimated 40-year assessed lifetime."	to introduce new areas of planting and build upon the character. With regard to views to the north, there are views from the secondary elevation at ground floor across a small lawned rear garden towards a small paddock bordered by a hedgerow, then with an area of deciduous woodland beyond. The woodland forms an 'L' shape and is a very strong feature in closing down visibility to the north and east of the property. With regard to views to the west, the ground floor windows in the west gable face towards a lawned area of garden and then towards the access drive and the collection of agricultural buildings beyond (with a small area of mature tree cover to the south of these outbuildings). These outbuildings and associated mature tree are a very strong feature in closing down visibility to the west of the property. Please refer to the Applicant's response to Action 2 in C8.1.24 Written Summary of the Applicant's Oral Submissions & Responses at Compulsory Acquisition Hearing 1 and Responses to Action Points [EX3/C8.1.24] submitted at Deadline 3 for a review of the

			The CSP has an installed capacity of 600MW, as stated by many and backed up by (DUKES), electrical output is on average just 10% of 600MW. So, it averages out over the year as a 60MW generator, more on summer days, less on winter days and nothing at night, but nevertheless it would average out at 60MW over a yearly cycle, generating a contextually small 0.52TWh per year, which is only 0.17% of the current UK annual needs of 300TWh. Simple multiplication would show that over the quoted 40 year lifetime the maximum possible generation by the CSP would be 21TWh not 35TWh, as stated by the Applicant. In any case, neither figures are large amounts of renewable generation. National demand is expected to rise significantly in future years, possibly up to 4x! This huge increase along with summer curtailment forecasts, means that solar's net contribution would diminish even further. It is clear we need bulk power not tiny percentages wasting vast amounts of land, of which we would soon run out.	visual impacts of the Scheme on the residential receptor at North Farm. Landscape and Visual: Photomontage Production The Scheme utilised a photography and visualisation team comprised of leading photography and visualisation specialists from across the UK. Co-ordinated by Lanpro and led by Mike Spence of MSE. Mike Spence has over 30 years photography and visualisation experience, working on a wide range of complex infrastructure projects, from major Highways schemes, to Carbon Capture, the power station development, tall buildings and solar projects across the UK. Crucially, Mike was a key technical author of the Landscape Institute's TGN 06/19 on visualisation of development proposals. He has worked alongside The National Trust, Historic England, English Heritage, RBG Kew, Historic Royal Palaces as well as NatureScot (formerly Scottish Natural Heritage) for whom he is currently working on updates to their windfarm visualisation guidance. The photomontage work undertaken for the project has followed recognised best practice 'Guidelines for Landscape and Visual Impact Assessment,

			"Table 7.1 of C7.11 Statement of Need [APP-350] shows the electricity generated per hectare by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind." Uk's average load factor for solar fluctuates between 9 and 11% (DUKES) therefore for calculating purposes it is 10%. Onshore wind load factor is around 30%, 3x higher than solar and the land beneath would continue to yield crops for the nation. This is a windy island not a sunny one. Nuclear, gas and wind power stations only displace a few hundred acres and provide reliable power in significant quantities. "Grazing is viable in solar farms as demonstrated by existing solar farms being grazed by sheep. Please see BRE (2014) 'Agricultural Good Practice Guidance for Solar Farms.' Ed J Scurlock. A solar farm of this scale also presents an opportunity to establish a new sheep grazing enterprise	Third Edition (GLVIA3) by the Landscape Institute and Institute of Environmental Management & Assessment and the Landscape Institute's guidance 'Visual Representation of Development Proposals Technical Guidance Note 06/19 (TGN 06/19)'. The photomontages produced comprise of a series of overlapping single frame 50mm photographs taken from a surveyed position using GNSS equipment to achieve a locational accuracy down to 1cm in eastings, northings and height. These overlapping images were cylindrically re-projected to ensure consistent geometry was achieved. The camera equipment used and technical methodology followed is set out within C6.3.8.15 ES Appendix 8.1.5 in detail. The survey verified photography was then matched with a geo-referenced accurate 3D Model built from layout data, OS MasterMap, and Environmental Agency LIDAR DTM (2m) data, with 3D point data used for checking horizontal and vertical alignment. Visualisations are presented as either AVR 0, 1, 2 or 3. The differences between each AVR are explained in the Landscape Institute's TGN 06/19. The resultant visualisations are highly accurate and therefore, the photomontages are considered to fairly

			even if an existing enterprise is not already present in the vicinity." There should be no weight given to any form of continued agriculture on the CSP. The token gesture of any sheep grazing, as seen at many other solar farm applications is just planning propaganda and a photo shoot opportunity. It has been documented that sheep grazing on solar farms can bring many negative concerns to the operator and farmer, and many operators have indeed halted this practice after planning approval has been granted. Cable and panel damage, rounding up difficulties and other husbandry issues being the main reasons for the cessation of this limited secondary function. The heavy and often wet land in the area is not conducive to sheep welfare. Hence this being an arable landscape, famed for growing cereals. Lincolnshire is after all "the Breadbasket of the UK." Another small issue is the obvious lack of sheep in this area. With the site likely to be sown with biodiversity mixes, not of forage yielding quality that would offer only poor grazing. This Agri-proposal is purely an empty option of no weight. The Applicant of the Gate Burton	demonstrate the correct positioning, scale and massing of the development in its local and wider context. Please refer to the Technical Methodology accompanying the Viewpoint Photomontages for further information [APP-069 – APP-073]. Site Selection Site selection is explained in C6.2.5 ES Chapter 5 Alternatives and Design Evolution [APP-040]. The land now under option for Steeple Solar Farm was not available to the Applicant when they were searching for willing landowners to host the Scheme.

			Energy Park has already acknowledged this fact. I am sure that the UK does not require hundreds of thousands of acres of additional sheep grazing on solar complexes, but I am sure that it will need the land for many other projects in the future. Consideration should also be given to the fact that the landowners new and multiplied income stream moves him away from any need or drive to invest in any marginal farming enterprises. I ask. Why the Applicant with such high climate morals would be promoting the expansion of livestock production that would exacerbate climate change? "One sheep can produce about 30 litres of methane each day. According to the United Nations Economic Commission for Europe, methane has 28 to 34 times the impact of carbon dioxide in a 100-year period and over the first 20 years after it reaches the atmosphere, it's 84 to 86 times more potent." "The photomontage work has followed recognised best practice ' Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) by the Landscape Institute and Institute of Environmental Management & Assessment. This guidance	

			states at paragraph 8.12 that: "It is important to show as realistically as possible how the development will appear both in relation to the surrounding landscape and from specific viewpoints from which it will be seen by particular groups of people". Then at paragraph 8.18 that "Its main advantage is that it can illustrate the development within the 'real' landscape and from known viewpoints." I find this statement quite unbelievable. "It is important to show as realistically as possible how the development will appear both in relation to the surrounding landscape and from specific viewpoints from which it will be seen by particular groups of people". Many, if not all the photomontages show tracking panels which would be 4.5m high, but they are not scaled to the landscape accurately and subsequently do not show this worst-case scenario of 4.5m and therefore are not realistic and do not represent the sheer industrial nature of this type and size of infrastructure in a countryside setting. I provide photo evidence in my WR." "The Scheme has a grid connection offer of 600MW, which caps the rate at which energy	

			can be exported to the National Grid. The Scheme is designed to be overplanted by up to 30% (the concept of overplanting is referred to in Section 7.7 of C7.11 Statement of Need [APP-350]) to maximise the lifetime generation from the Scheme.. As such, the installed capacity of the Scheme may be as high as approximately 780MWp, although this figure is provided as an illustration only and the Applicant is not proposing a limit to the capacity of the Scheme." On finding out about this overplanting, I feel there is even more evidence of why there is no need to encircle my home by this proposal, and I would expect room for maneuver on this critical life changing issue for my family. The scheme's overall land use efficiency is further reduced if the theoretical output is 780MW but is constrained to 600MW Grid connection. This unnecessary industrialisation of the countryside takes the misuse and waste of farmland to another level. The many thousands more panels being used than required is unacceptable and was certainly not mentioned during consultation. This overplanting of panels is at the expense of greater visual impact of the	

			scheme and detriment to communities. This spare capacity should be used as a means of physical size reduction and improving mitigation. There needs to be some compromises made here, with 4 schemes, all over planting means the cumulative effect would be of another giant solar farm. We would in theory now have 5! "Existing hedges would also be allowed to grow out and will be managed to a height of 5m. Hedgerow trees will be encouraged to grow out to add further thickening and growth to the field boundaries." With solar panels of 4.5m in height, a 5m hedge would only provide summertime screening on a totally flat landscape and from flat viewpoints, many areas on this scheme including the land around my property are largely sloping. The hedges in these areas would need to be at a ridiculous and unachievable height using native species such as Hawthorne and Blackthorne and would serve only to block views and spoil the open character of the area. Hedgerows will not be able to thicken up into field boundaries as stated, as the space between the steel security fencing and hedgerow is	

			too narrow to accommodate any significant increase in growth and still leave room for large hedge cutting machinery. I fear hedge row mitigation is not enough. For 6 months of the year the proposed mitigation would be useless with miles of solar arrays visible during the stark winter months. This would make for a very depressing landscape, especially in the knowledge that the solar arrays would be contributing almost nothing to our energy needs at this time! 50% Mitigation at the very best, is not acceptable. I finish on an issue raised by many in their RRs. This is site selection. IGP have stated during meetings and consultation that the reason Lincolnshire had been targeted for these giant solar schemes, is that there was no suitable land in Nottinghamshire close to the old power stations. There has recently been an announcement of another giant solar farm "Steeple Solar". This proposal is adjacent to West Burton power station. Arguably in a more practical location? This news seems to question the site selection narrative and is another area where	

			unfortunately the Applicants trust has been lost. It appears that it is not really "site selection". It is purely areas offered by large landowners exchanging agriculture for an easier and elevated revenue stream. The distance from the Grid is considerable on this project, with criteria produced to suit the case. Thank you	

P A Mitchell [REP2-103] - Link

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			This is just a tiny snapshot of what is presently available in the local area to the tourist but as these projects will wholly consume and encircle N , S, E & W all 30 villages - who will want to visit the area then. LINKING TOURISM AND AGRICULTURE 1. Lincoln was a Roman town which, rivalling London in its importance, became one of the largest, wealthiest and most influential Roman towns in England. Many impressive Roman remains are still scattered across the city and distant countryside. One of the most	Please refer to response to comment STR-21 in document C8.1.18 The Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 3 [REP2-051] where the Applicant has addressed comments on these matters. Additionally, the Applicant seeks to confirm that the assessment of the tourism value of heritage assets has been duly considered in the assessment of impacts on tourism and recreation in the Local Impact Area. Please refer therefore to paragraphs 18.7.58, 18.7.103, and 18.7.140 of C6.2.18 ES Chapter

			historic parts of the city's Cathedral Quarter is Bailgate's picturesque cobbled streets which are lined with restaurants, cafes and shops. Lincoln Castle dating from 1068 houses the famous Magna Carta, Lincoln's magnificent medieval Cathedral, other historic buildings and areas of note bring visitors from far and wide. Roman roads are a significant part of that era - the A1500 is on the route of the proposed solar farms. Our unique aviation heritage draws in tourists - the Red Arrows Display Team - the famous former RAF Scampton which sits on the Jurassic Escarpment overlooking an Area of Great Landscape Value (AGLV) and the Viewing Point at the junction of the A1500 and B1398. • The Greater Lincolnshire's Visitor Economy is currently estimated to be worth over £2.39bn per annum with long-term growth potential. It is high-quality and varied offered across city, coast and countryside and supports at least 30,000 full time equivalent jobs. It is absolutely essential to the area. • The 30 affected villages are Lincolnshire's countryside, they are visitor destinations, they are part of the 10,000 acres therefore	18_Socio Economics Tourism and Recreation [APP-053] which assesses no greater than a moderate-minor adverse effect to heritage tourism attractions in the Local Impact Area at any point of the Scheme's lifetime. Landscape and Visual: Indirect effects on Tourism ES Chapter 8 Landscape and Visual Impact Assessment Revision A [REP2-008] (the 'LVIA') considers both the landscape and visual effects of the Scheme on the local environment and any recognised associations with the visitor offer. This takes account of views across the low-lying Till Vale as the baseline situation. The LVIA [para 8.5.152, 8.5.14, 8.5.21, 8.5.31 and 8.5.152] recognises the importance of the Till Vale as playing a part in the views across the Study Area extending between the Trent Valley to the west and the Lincoln Cliff to the east. The LVIA therefore considers the features of the Till Vale in the context of potential visitor enjoyment. The LVIA includes a suite of 67 viewpoints that cover long range views across the Till

			tourism should not be scoped out of the examination process. • These villages and their surroundings have history in abundance. (see Map 2) attached. • They help support the local economy and currently benefit by drawing in tourism to their b&bs,holiday cottages, fishing holiday parks, tea rooms, hostelries, other shops and businesses, etc. • Tourism and visitor footfall is an important feature of these areas all year round. There are an absolute minimum of 35 holiday cottages/b&bs/Retreats/Inns in the communities that will be affected by the solar projects, notwithstanding a range of shops and other businesses. This is not a finite list. Lincolnshire Agricultural Show – one of the UK's best-known. This flagship, two-day midweek event in June attracts an average of 60,000 people where competitors and visitors travel from all parts of the Country to participate. It welcomes 600 trade stands, over 6,000 local school children and 500 exhibitors each year. The Showground hosts an extensive variety of events throughout the year ….. 'Countryside Lincs' being one is an	Vale, for example viewpoints VP01, VP24, VP25, VP26, VP27 and VP29 for Cottam 1, VP44, VP47, VP52, VP55 and VP56 for Cottam 2 and VP64 and VP65 for Cottam 3. There are also an additional 25 viewpoints at the request of Lincolnshire County Council that were agreed at the LVIA Workshops including long range views, for example LCC-C-E and LCC-C-L for Cottam 1, LCC-C-Q for Cottam 2 and LCC-C-W and LCC-C-X for Cottam 3. The visual effects for the long-range views are set out in ES Appendix 8.3 Assessment of Potential Visual Effects Revision A [REP2-012]. Hydrology The Applicant acknowledges that areas within and adjacent to the scheme are currently susceptible to fluvial and surface water flooding. That notwithstanding, the panelled areas are not expected to increase surface water runoff from the Sites as the grassland beneath them still exists and will be brought back to a more natural state than it is currently in. Soil and surface management is considered in section 4.0 and paragraph 5.3.4 of the C6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-090]. The proposed drainage strategy is

			event for all the family. Riseholme Agricultural College of Further and Higher Education, established in 1949 adjoins the Showground. One of the finest land-based colleges in the country, specialising in Agriculture, Equine and Animal Management with access to 500 acres of arable and grassland to learn the full crop cycle. Both settings sit high on the Jurassic Escarpment, are just a few miles from the City of Lincoln and look out across the surrounding patchwork fields of crops, countryside and villages. Instead of taking in the scenery along the Showground routes of A1500, B1398 and B1241 local people, tourists and visitors alike will be faced with a sea of 7,000,000 glass solar panels, glint and glare and paraphernalia mile upon mile as far as the eye can see, a blight on the countryside below. Anyone who loves the countryside would not wish to be met with a 'welcome' of this kind. 2. Lincolnshire is one of the prime agricultural areas in the UK. Greater Lincolnshire has an international reputation for food, fish, and farming and has one of the largest concentrations of food manufacturing, research, storage and	detailed within Section 5.0 [APP-090]. It is considered that the panelled areas will not alter the existing surface water run-off regime and will therefore not be formally drained. Areas of increased hardstanding such as smaller areas of hardstanding formed as footings for electrical infrastructure will utilise sustainable drainage (SuDS) principles and attempt to mimic the existing surface water run-off regime as existing. The drainage strategy is secured by Requirement 11 in Schedule 2 of the C3.1_E draft Development Consent Order Version E [EN010133/EX3/C3.1_E] (provided at Deadline 3). As referenced in the C7.9_A Outline Battery Storage Safety Management Plan Revision A [REP2-030] a comprehensive Emergency Response Plan (ERP) will be developed with LFR. The ERP will consider all credible emergency response scenarios. The Battery safety management plan is secured by Requirement 6 in Schedule 2 of C3.1_E draft Development Consent Order Version E [EN010133/EX3/C3.1_E] (provided at Deadline 3).

			distribution areas in Europe. This region is responsible for growing 30% of the nation's vegetables, and producing 18% of the poultry, with a total agricultural output of over £2bn in 2019, representing 12% of England's total production with major arable, poultry and meat processors spread right across the area. Crops grown in Lincolnshire include wheat, barley, sugar beet and oilseed rape. Farmers grow a fifth of the nation's sugar beet, over 12% of its potato crop and 30% of its field vegetables. In total the food chain provides 24% of jobs throughout Greater Lincolnshire (as compared with just 13% nationally) and 21% of its economic output (7% nationally). The future of the food chain is therefore absolutely vital to Lincolnshire and its population, and as such we are strategically important to national food security. (source: Greater Lincolnshire LEP). P A Mitchell November 2023 ID: 20037189 COTTAM SOLAR PROJECT ExQ1 issued on 31 October 2023 - Deadline 2 - 21 November 2023. 7. The Water Environment - (1.7.1 – 1.7.24)	

			In September 2019 Lincolnshire was coping with significant and prolonged rainfall when some of the highest levels ever were seen in the watercourses and levels in the River Witham in November 2019 were the highest ever recorded, exceeding the previous 2007 level. Twice the average rainfall fell in September and in October there was two and half times the average rainfall, and the entire month's average fell in the first two weeks of November 2019. Flooding had been prevented in 2000 and also to Lincoln City itself in the summer of 2007 when flood defences were deployed but there was further flooding on 26th November 2012 when the Brayford Pool burst its banks. Between the 19th October and 20th October 2023 a whole month's rainfall fell in just 24 hours, there was widespread flooding around the County and Lincoln City Centre was again flooded. Despite the protection of the washlands, a complex system, there was still an enormous amount of flood water – see Images taken 20th/21st October 2023 attached at Appendix A.	

			Unhappily when the fields, dykes and roads in and around these communities are flooded and the local village drainage system cannot disperse this into the dykes, which are already under considerable strain, buildings and houses are flooded, raw sewage is released and roads still closed with the complications and strains this brings. As mentioned in my Oral Representation at the Open Floor Hearing on Tuesday, 5 September, 2023 the River Till runs through the villages of Bransby, Thorpe le Fallows, across the fields to Ingham Road on the outskirts of Stow onto Willingham by Stow but, more importantly, right through the centre of the Cottam 1 scheme. Again miserably one month ago, as in 2019, Bransby Horses Home suffered extensive flooding rendering 40% of their grazing land un-useable with significant costs to be incurred and 70 horses being moved. With fields still saturated and the possibility for further wet weather throughout the winter I and the local communities are concerned about further flooding.	

			I ask the Examining Authority to consider the implications of Cottam 1 Solar on the landscape as it is within the washlands floodplain with the likelihood of much greater flooding occurring in the future as temperatures rise with hotter summers and wetter winters predicted. a) I have significant concern at the rate at which surface water runoff during heavy or persistent rainfall will occur from millions of 4.5 metre high solar panels as it enters the land drains leading to the River Till from Island Green Powers Cottam 1 around Bransby, Sturton by Stow, Thorpe le Fallows, Stow, Willingham by Stow and areas through which the River Till flows. Add in hard stranding of the access roads and any concrete supports for the solar panels, concrete bases for substations and other hardware and the ground will be unable to absorb such excess. b) In flood prone areas such as Cottam 1 and West Burton 2 there is no amount of swales that could absorb /capture prolonged rainwater runoff and redirect it. The River Till in spate will already be under considerable	

			strain as will the dykes that feed into the River Till. As flood water finds a level the fields and roads around these two sites will be under a significant depth of floodwater. (West Burton Solar Flood Risk Assessment Environmental Statement Appendix 10.1 March 2023 Point 3.0, Table 3 Summary of Risk states for West Burton 2 : The Risk from the site from all sources of flooding is Negligible to Low) Where will it be redirected to? c) What measures are in place with the Fire Service to deal with a BESS Fire when the land for these proposed solar farms is flooded, especially if the local Fire Service resources are depleted while dealing with flood matters elsewhere in the County ? d) Where will the water be obtained from to cool such fires / thermal runway in the event of extreme flooding on the land and the surrounding areas ? e) Bearing in mind the above what would be the environmental impact of a battery fire / thermal runway under such floodwater conditions for example, how would dangerous toxins / chemicals contamination	

			be prevented from seeping into the flood water and then into the wider water courses? ATTACHMENTS: Appendix A – Flood Images Appendix B – Socio-EconomicTourism + Map attachment	