Cottam Solar Project

Applicant's Responses to Deadline 3 Submissions

Prepared by: Lanpro Services Ltd.
January 2024

PINS reference: EN010133
Document reference: EX4/C8.1.29
Rule 8(1)(b)

Cottam
SOLAR PROJECT

Contents

Issue Sheet

Report Prepared for: Cottam Solar Project Ltd.
Examination Deadline 4

Applicant's Responses to Deadline 3 Submissions

Prepared by:

Name: Aidan Van de Weyer

Title: Senior Planner

Approved by:

Name: Beccy Rejzek

Title: Associate Director

Revision	Datel	Prepared by:	Approved by:
original	30 Jan 2024	AV	BR

1 Introduction

1.1.1 This report provides the Applicant's responses to matters raised in submissions made at Deadline 3 on 19 December 2023.

2 Applicant's Responses to Deadline 3 Submissions

Lincolnshire County Council [REP3-050]

Reference	Theme	Summary of Issue Raised	Applicant's Response
LCC-01		**Post Hearing Submission** **ISH2** **The historic environment** 2. LCC remains concerned that the level of information submitted in relation to below ground archaeology remains insufficient. The Applicant has undertaken desk based work and technical surveying but has not corroborated this with sufficient trial trenching across the site. This is in conflict with relevant guidance, means the likely significant effects have not been accurately described (or LCC can have no confidence that this is the case) and is out of step with work done on other similar projects in the area. 3. Mr Matthew Adams, LCC's Senior Historic Environment Officer attending ISH 2 and commented as follows: 4. In his view, it is essential as per the relevant legislation and guidance (including the EIA Regs, and NPPF) that the applicant undertakes sufficient evaluation to adequately describe and assess the direct	With consideration to Items 2 to 8 the Applicant refers to their responses during ISH2 (see Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing [**REP3-061**]). In particular as evidenced at ISH2, the Applicant considers the archaeological evaluation, which comprised geophysical survey **[APP-110 to APP-122]**, air photo and LiDAR **[APP-124]** and targeted evaluation trial trenching **[APP-129 to APP-130]** to be sufficient to inform the DCO application and is in line with NPPF, NPS EN-1, NPS EN-3, the Central Lincoln Plan (Policy S57), as well as guidance produced by Historic England, the Chartered Institute for Archaeologists and the Lincolnshire County Council Archaeology Handbook. With consideration to Item 6, as detailed in responses given at ISH2 [**REP3-061**], evaluation trial trenching for the Heckington Fen solar site (i.e. excluding the cable routes) comprised a sample of 1.63%. The Applicant acknowledges that several mitigation areas were identified on the Heckington site solely through evaluation trenching due to local geology impacting the success of geophysical survey to identify buried archaeological features. As stated at ISH2, the Applicant highlights that the geophysical survey results

		and indirect impacts of the proposed development on cultural heritage. 5. The applicant has undertaken sufficient documentary and non-intrusive survey work, but has only completed 17.5% coverage of the necessary intrusive field evaluation (trenching) work to date. This leaves over 80% of the site where the impact from development is not properly understood and cannot be reasonably assessed. 6. There are numerous examples in Lincolnshire & Nottinghamshire where evaluation trenching has been the sole identifying technique for significant archaeological remains which were missed by documentary research and geophysical survey. Several of the main mitigation areas for the Heckington Fen Solar Farm (NSIP) were identified through evaluation trenching alone. 7. It is essential that trial trenching in conjunction with geophysical survey are used to understand the archaeological resource. Without a combination of those two techniques and the complimentary information that they provide, it is not possible to have a sufficiently substantial understanding of the archaeological implications of the development and cannot with any degree of certainty establish an adequate mitigation strategy.	for the Scheme have been proven to be reliable. Land with the Scheme has a different geological formation to the Heckington Fen scheme, and there is no evidence within the Scheme's geophysical survey results for widespread geological disturbance that has masked potential archaeological responses. In response to Item 9, the Applicant agrees that broad agreement has been reached regarding areas considered by LHPT to be sufficiently evaluated, with the exception of the use of concrete feet. During a meeting on the 14th December 2023 LHPT "*agreed that concrete feet are a reasonable and viable option for mitigation where adequate evaluation has been undertaken, ground conditions are suitable, and where the depth, condition and nature of the archaeology is such that it would not be negatively impacted by their installation, compaction during the operational life of the site or subsequent decommissioning impacts. The Applicant highlighted that all areas proposed for concrete feet have been subjected to evaluation trial trenching. In a previous meeting on the 3rd October 2023, LHPT mentioned a recent scheme in Lincolnshire where a design of concrete feet was considered appropriate for mitigating impact to archaeological remains. LHPT provided an update to the request for information pertaining to the design, and have agreed to provide relevant information if in the public domain.*" Full details of the discussion are provided in Table 2-1 of the Statement of Common Ground [**REP-063**]. The Applicant has requested

		8. The archaeological assessment submitted by the applicant is therefore incomplete and we can neither know where the archaeology lies nor understand the impact of the development and consequently the outline mitigation strategy (written scheme of investigation) is premature in putting forward its recommendations and cannot currently be agreed as a whole and complete strategy for mitigation of the development's pact. 9. Mitigation measures for the 17.5% of the site that has been properly evaluated have been discussed with the applicant and broad agreement of the scope in these areas has been reached with the exception of the use of concrete shoes as a mitigation technique. Further refinement of the approach is still required and further discussion has been arranged with the applicant and LCC, as encouraged by the ExA. 10. The archaeological mitigation strategy for the grid connection cable corridor route to the south of Stow Park Road (A1500) and to the connection point at Cottam Power Station has been agreed. Sufficient assessment was undertaken for this section of the development (notably by another applicant which shares the same cable corridor). 11. We do not agree that piling is a low impact activity or that it is an acceptable mitigation strategy, especially	specific comments on the Written Scheme of Investigation (WSI) **[APP-131]**, and looks forward to receiving these, so that suitable wording can be agreed within the document between all parties on a without prejudice basis. As stated in Item 10, the Applicant agrees that the archaeological mitigation strategy for the grid connection cable corridor route to the south of Stow Park Road (A1500) and to the connection point at Cottam Power Station has been agreed. In response to Items 11 and 12, as detailed during ISH2 [**REP3-061**], the Applicant highlights the reliability of the baseline data and non-intrusive survey techniques, in particular the results of the geophysical survey, and that there is a low potential for significant archaeological features to be extant that have not been identified by the works undertaken to date (including burials). The Applicant also highlights that, as stated in EN-3, the below ground impacts caused by a solar PV development are generally limited (Paragraph 3.10.109), and that solar PV developments *"may have a positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated"* (Paragraph 2.10.110). During a meeting on the 22nd March 2023 between LHPT, Historic England and the Applicant, Historic England "*stated that the areas not subjected to evaluation trial trenching appeared*

		in areas that have not been sufficiently evaluated. The scheme will result in having hundreds of thousands of point impacts within the solar area coupled with service trenches, other infrastructure and heavy construction activity that will lacerate and puncture the archaeological resource without clarity and without understanding the nature of the resource it's impacting upon. In the case of some sensitive archaeological remains (for instance human burials) piling will have an extraordinarily high impact and many of these features do not show up on geophysical survey alone. 12. Failing to adequately evaluate the proposed site places significant risk on the development/construction phase of work where unexpected archaeological remains will lead to programme delays, the unnecessary destruction of archaeological assets and potentially a consented scheme that is not deliverable as designed – a point notably supported by Historic England in this instance. 13. At ISH2 the Applicant attempted to justify the small percentage of trial trench coverage by reference to research undertaken into coverage for other projects, however, there are many inputs into the decision as to what is an appropriate trenching percentage and without understanding the site and the project on a case-by-case basis, comparables are of little use.	*to be quite large and so the project contained a high level of risk. HE believed that a middle ground (between no trenching or a high sample of trenching) should be found to proportionately manage risk. Although the preference would be to undertake additional trenching pre-consent, a phase of additional trenching post-determination (but as far ahead of construction as possible) would be suitable to 'de-risk' areas that had not been subject to a programme of trenching.*" Full details of the discussion are provided in Table 2-1 of the Statement of Common Ground [**REP-063**]. At ISH2 the Applicant provided evidence relating to the sample of evaluation trial trenching undertaken by other solar-based DCO schemes that had either been consented or were currently at the examination phase. No Scheme had been identified that had completed evaluation trial trenching at the high sample required by LHPT for the Scheme, including those where the DCO had been granted – these include Longfield Solar Farm (sample of 0.08%), Cleve Hill Solar Project (no evaluation trial trenching) and Litte Crow Solar Park (0.47% sample). At Deadline 3 the Applicant submitted a comparison of archaeological investigations on Solar Schemes [**REP3-041**]. The Applicant agrees that there should be a flexible approach to evaluation trenching with consideration to baseline information and, where available, the results of non-intrusive evaluation. The Applicant does not believe that there is justification for a high sample of untargeted evaluation trenching

		Further, LCC considers the most directly comparable project is Gate Burton as it is close by geographically and of a similar scale. The Gate Burton applicant has worked with the Council to undertake a sufficient amount of trenching and the Council is, in that case, happy to condition the remainder within a requirement. The same is not true here.	predetermination of the DCO, and that this requirement is contrary to national and local guidance. For example, the Lincolnshire County Council Archaeology Handbook (P.62) states "*should trial excavation be required the specification should include a detailed reasoning for the application of the technique.*" The Applicant agrees that the most directly comparable DCO project to the Scheme is the Gate Burton Energy Park which, removing 'exclusion zones', was subject to a sample of 1.09% (777 trenches measuring 1.8m by 50m trenches over an area of c.640 hectares). As detailed in Table 2-1 of the Statement of Common Ground [**REP-063**] when the Applicant enquired for further information in March – April 2023 to support the different stance adopted by LHPT for required works between the Scheme and the Gate Burton Energy Project, LHPT were unable to provide an archaeological justification stating "*that they had more confidence in the Gate Burton Scheme undertaking evaluation works as determined reasonable by LHPT*". In response to paragraph 2 of LHPT's proposed Requirement text, the Applicant considers that it would be unreasonable for the archaeological DCO Requirement to allow for unquantified and potentially disproportionate levels of archaeological fieldwork to be insisted upon as part of a 'supporting Written Scheme of Investigation' once the DCO has been granted. The Applicant proposes that a detailed site specific WSI should be agreed and implemented as part

			of the DCO, and that the wording of the archaeological Requirement should reflect the need to implement this agreed WSI.
LCC-02		**Agriculture and Soils** 14. The Applicant's ES relies upon a 40 year time horizon but the Applicant now seeks a 60 year consent. The Applicant's advocate noted at ISH5 that this was treated as a permanent application and that in numerous places the ES notes that there was, at that stage, no set timeframe for decommissioning. 15. It is in this light that the Applicant's reliance on IEMA guidance should be seen. The Guidance treats temporary and permanent effects as entirely binary and, unlike other established guidance such as GLVIA3, fails to acknowledge that some temporary effects are temporary in name only. A 60 year lifespan is all but equivalent to an entire life time and, on a human scale, is hardly "temporary" in the common use of this word. As recognised by GLVIA3, effects of this longevity should be assessed as essentially permanent effects as that is how they are experienced in reality. 16. The Applicant conceded at ISH2 that there is no proposal to secure sheep grazing. As such, the entire site is to be removed from agricultural use for the duration and should be assessed on this basis. The soil resource may eventually become available again but	The agricultural land resource and the soil associated with it are not lost to or degraded by the Scheme.. The Applicant does not consider it correct to say that the entire site is "*removed from agricultural use*". As explained by Mr Baird at ISH2 **[REP3-033]**, the land will be available for sheep grazing although there is no obligation for this to take place as part of the DCO. However, a farmer is not obliged to crop a piece of land and a decision not to do so did not alter the land's status as agricultural land from a planning perspective. Mr Baird noted that whilst the economics of managing grass growth may change during the operational life of the Scheme, he considered that grazing small livestock such as sheep would remain a viable and cost effective option. Mr Baird further confirmed that the assessment in Chapter 19 of the ES was not reliant on the ongoing use of the land for grazing to reach its conclusions on likely significant effects, rather it is a management tool during operation (to manage the growth of grass). He reiterated that the use of the land does not affect ALC grade, nor does the presence of a solar farm change the fact that the land is still agricultural land resource.

		the loss for 60 years is a significant and weighty adverse effect of the proposal. This is particularly so when assessed in combination with other projects in Lincolnshire which are all for similar timescales.	
LCC-03		**Landscape and visual** 17. Contrary to the Applicant's assessment, which identifies significant beneficial landscape effects on both landscape character areas and individual contributors to landscape character, Mr Brown on behalf of LCC has assessed the project as resulting in significant adverse impacts on landscape character. The Applicants assessment does not provide appropriate justification for assessing several beneficial landscape and visual effects that have been judged would occur through the construction and operation of a large solar development. There are also several minor beneficial landscape effects (not significant) identified in the assessment, predominantly at the Operation (Year 1) phase of the development, that also lack justification: newly establishing grassland areas and maintaining existing hedgerows to increase height to 5m (as outlined in Appendix 8.2 of the assessment) are not a perceptible benefit at such an early stage and tall 5m hedges are out of character being a very tall element when hedges are typically relatively low in this landscape.	17. The approach to the identification of significant beneficial effects on landscape character is set out within the Written Summary of the **Applicant's Oral Submissions & Responses at Issue Specific Hearing 2 and Responses to Action Points [REP3-033].** Please refer to Appendix 1 of this document, which sets out how the conclusions on beneficial effects within the LVIA are guided by five key factors or baseline considerations: 1. Landscape value 2. The context of EN-5 3. Use of GLVIA3 4. Professional opinion and experience in delivering large scale infrastructure projects; and 5. Published landscape character assessments. The Applicant has provided a further update on the identification of significant beneficial effects on landscape character since it was requested that LCC and the Applicant provide a joint statement regarding the weighting of the significance of the positive impacts of mitigation on landscape. Two meetings were held on Thursday 4th January and Monday 15th January 2024

		18. Whilst establishing planting will add a positive element to this landscape and vegetation removal, as shown on the Landscape and Ecology Mitigation and Enhancement Plans (Rev A), is relatively minimal, this is in the context of extensive change to land use over a large area, affecting the current sparsely settled and quiet agricultural character, which is currently unprecedented in the county in terms of scale. LCC has considered whether the secured mitigation balances out the change but concluded that the urbanising element in rural agricultural land is a definite, significant and adverse change. Mitigation planting goes some way to reduce this but the result is an adverse impact. In this context it is striking that the Applicant's conclusions are at the polar opposite end of the scale. 19. It is possible to calibrate these judgements to some extent – Gate Burton shares landscape character areas and this applicant recorded no benefits to landscape or visual receptors, identified in their report. Another way to calibrate is that if someone was sent to undertake an assessment of this LCA, how would the project, if constructed, impact that assessment? In our view, the scheme would become a defining feature in that landscape and in the LCA. This speaks to the major change and the adverse nature of the effect.	with Lincolnshire CC at which these matters were discussed. 18. The Applicant refutes the suggestion that the proposed mitigation is 'relatively minimal' as the landscape proposals associated with the Cottam Solar Project include for approximately 29.4ha of new woodland (including shelterbelts, scattered trees, scrub), 20.5km of new hedgerows and hedgerow trees 20.5km, 1030.8ha of new grassland and meadows and 1.5ha of wader scrapes and ponds. The Biodiversity Net Gain Report **[APP-089]** sets out (Paras. 6.1.3 to 6.1.5) that the Scheme will result is a significant net gain for biodiversity, with 96.09% gains provided in habitat, 70.22% gains in hedgerow creation and enhancement of existing hedgerows and 10.69% gains as a result of enhancement of existing ditches. 19. Whilst the Gate Burton scheme does share some landscape character areas with the Cottam Solar project, the Gate Burton scheme is a singular site located partially within the Laughton Wood Area of Greater Landscape Value (AGLV). The Cottam Solar Project is not located within an AGLV and is comprised of a series of disparate sites that are separated with tracts of land and with landscape features between that assist with its integration and assimilation into the landscape. There is no direct comparable position with the Gate Burton solar project as this Scheme has a different

		20. Landscape matters will be discussed with the Applicant via the SOCG. An initial meeting has been organised with the applicant on the 4th January 2024 which will focus on the areas of contention/points of disagreement over the conclusions on the significant landscape and visual effects. This will provide an opportunity to discuss the Applicants findings and investigate where any realignment of judgements may be possible.	baseline or starting point. As set out above, Gate Burton occupies (in part) a landscape that affords local designation (AGLV), whereas the landscape at Cottam is not nationally or locally designated. The landscape at Cottam is subject to a notable pressure for change from its predominant use as agriculture and the bench line or starting point for the landscape baseline affected by these sensitivities is associated with this condition and quality. The benefits to landscape character have the scope to restore the landscape baseline. The Environmental impact Assessments for each of the Schemes have been undertaken independently, and different impact assessments can reach different conclusions. The differences between the conclusions of the Cottam Solar Project LVIA and the one undertaken for the Gate Burton Energy Park are not unexpected given the elevated value of the receiving landscape at Gate Burton compared to Cottam, and the difference in approach to design and mitigation between the two schemes. The Applicant's assessment has drawn out the importance of the published landscape character assessments in forming the baseline for the assessment, especially as the evidence base to underpin the local landscape designations. The Applicant's assessment has taken account of the defining characteristics or 'forces for change' (as set out

			within the WLDC LCA 1999) that now apply and has brought the landscape baseline more 'up to date' from the West Lindsey District Council Character Assessment (August 1999) position. The Applicants assessment takes account of the current position on climate change in the context of NPS EN-5, the impetus for the provision of renewable energy infrastructure and the capacity for the receiving landscape to adapt to climate change. 20. A meeting was held on the 4th January 2024 between the Applicants Landscape Architects and representatives from LCC. This discussed the Applicants findings including clarification of the In-Combination effects associated with the Cottam Solar Project. A Draft Statement setting out the specific conclusions reached within the Cottam LVIA in regard to In-Combination landscape effects was issued to LCC on the 11th January 2024 to aid LCC's review of the LVIA Rev A **[REP2-008]**. See appendix to Joint Statement on Beneficial Landscape Effects appended to SoCG with Lincs County Council **[EX4/C8.3.2_C].** Following the clarification of the findings of the Cottam LVIA at the meeting with LCC on the 4th January 2024 a subsequent meeting was arranged for the 15th January 2024 where preparation of the Joint Statement was discussed further.
LCC-04		**Battery storage and fire safety**	As detailed in **C8.1.22 Written Summary of Applicant's Oral Submissions and Responses to**

		21. LCC is satisfied that the project will be safe but requires recovery of funding from the Applicant to enable the required frequency of site visits. It is noted that the Applicant has agreed to the principle of providing necessary sums and the precise mechanism for doing so will be discussed with the Applicant.	**Action Points at Issue Specific Hearing 3 [REP3-034]**, agreed protective provisions with Lincolnshire Fire and Resue Service (LFRS) setting out an obligation to facilitate a site familiarisation exercise have been included in Part 16 of Schedule 16 of **C3.1_C draft Development Consent Order [REP3-004]** submitted at deadline 3. They also include provision for yearly site visits, the costs being covered by the Applicant. The first payment will be larger and cover the familiarisation process, with yearly payments being lower. The Applicant understands that the mechanism of including direct payment to LCC in its role as the local fire and rescue service via protective provisions has now been approved by LCC.
LCC-05		**ISH4 – Cumulative effects** 22. No residual adverse cumulative effects were identified within the Applicants assessment, and only a few adverse cumulative landscape effects were identified. LCCs position is that the cumulative landscape and visual effects of the development would bring about significant landscape and visual effects when assessed alongside the proposed Gate Burton, West Burton and Tillbridge Solar schemes. The mass and scale of these projects combined would lead to adverse effects on landscape character and visual amenity over an extensive area. The landscape character of the local, and likely regional area, may be	22. The Landscape and Visual Impact Assessment (LVIA) contained within C6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment Revision A **[REP2-008]** includes a cumulative effects assessment, which identifies significant effects with Tillbridge Solar. For the assessment of landscape effects, these effects would be moderate adverse at the construction and operation (Year 1) stages. Please refer to ES Appendix 8.2 Potential Landscape Effects Revision A **[REP-020]** for the individual assessment sheets for Land Use, Topography and Watercourses, Communications and Infrastructure and for the Substation Sites. For the assessment of in-combination landscape effects there would also be the combined effects of the four substations at the construction and operation (Year 1)

		completely altered, particularly when experienced sequentially while travelling through the landscape. LCC's disagreement with the Applicant's landscape assessment will be explored further via the SOCG and the meeting with the applicant on the 4th January 2024 will provide an opportunity to discuss the Applicants findings and investigate where any realignment of judgements may be possible.	stages. Please refer to LVIA, paragraph 8.9.10 and ES Appendix 8.2 Potential Landscape Effects Revision A **[REP-020]**. For the assessment of in-combination visual effects, there would also be the combined effects of noise, dust and visual effects, of the individual topic areas and of the different works of the Scheme at the construction stage. Please refer to the LVIA, paragraphs 8.9.14 to 8.9.29. For the assessment of visual effects, these effects would be moderate adverse at the construction and operation (Year 1) stages. Please also refer to the individual assessment sheet for the viewpoint LCC-C-D: Blackthorn Lane at Appendix 8.3 Assessment of Potential Visual Effects Revision A **[REP2-012]**.
LCC-06		**ISH5 – draft DCO** 23. Article 9: discussions with Applicant are ongoing around the level of detail provided for highways works. LCC is concerned that detailed highways works which affect safety e.g. access details are left to requirement discharge with a deemed discharge provision rather than via s.278 procedure.	Please refer to Agenda Item 5 of the Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 5 **[REP3-038]**. Following further discussions on this point at the West Burton Issue Specific Hearing on 23 January 2024, the Applicant understands that LCC will review the amendments made by the Applicant to the **Outline Construction Traffic Management Plan [EN010132/EX4/WB6.3.14.2_E]** and provide its comments as soon as possible.
LCC-07		24. Welcome amendment to (4) which provides that powers in (2) can be subject to s.278 procedure but this leaves over works which are in Schedule 5 and would theoretically see a sub-standard junction be approved	Please see the response to LCC-06.

		via deemed discharged if the Highway Authority was unable to respond to a discharge request in time. Given the safety implications of this, it is unacceptable.	
LCC-08		25. Article 15 – a similar point arises as in relation to Article 9. There is a requirement for LCC consent for measures not in Schedule 8 but only a notification requirement for measures which are in Schedule 8. LCC would prefer detail to be submitted to us for approval rather than just a notification provision. This has potentially important implications if signals and other road traffic regulation measures are considered cumulatively with other projects where other applicants have similar powers.	Please see the response to LCC-06.
LCC-09		26. Other DCOs provide more control to the Highway Authority. For example the (draft) A12 widening DCO provides at the introduction to the equivalent Article that the various powers are granted "subject to the provisions of this article, and the consent of the traffic authority in whose area the road concerned is situated, which consent must not be unreasonably withheld…"	Please see the response to LCC-06.
LCC-09b		27. This does not duplicate the CTMP approval procedure as, if the CTMP includes the necessary details for proposed traffic regulation then the approval of the CTMP would amount to approval for the purposes of this requirement. Alternatively it would	Please see the response to LCC-06.

		be open to the Applicant to submit separate details for approval outside of the CTMP.	
LCC-10		28. Article 38 - hedgerows. LCC has had discussions with Applicant around two parts of this provision – trees and shrubs/ hedgerow definitions potentially overlap and clarity is required around how this will operate.	Please refer to Agenda Item 4 of the Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 5 **[REP3-038]**.
LCC-11		29. Requirement 9: LCC note that there is no set % for BNG secured. Para 1.1.12 of the planning statement relies upon a 96% net gain but this is not secured (note the Requirement only secures the OLEMP but this does not refer to percentages).	Please see the Applicant's response to Second Written Question 2.1.9 **[EX4/C8.1.30]**.
LCC-12		30. For Requirement 12 there is a tension between the Council and the applicant, the Council's archaeology team are not satisfied with the written scheme of investigation as currently drafted as there is disagreement as to what should be included in this document. The wording of this requirement is not agreed and discussions are on-going outside of the examination. At the core of this disagreement is the amount of trial trenching that should be undertaken across the Order limits. The Councils Local Impact Report will provide further details relating to this disagreement.	The Applicant has requested comments on the methodology detailed in the Written Scheme of Investigation (WSI) **[APP-131]**, and looks forward to receiving these, so that suitable wording can be agreed within the document between all parties on a without prejudice basis. In light of the disagreement about the quantum of trial trenching that is considered necessary for the Scheme, the Applicant has significant concerns that any requirement that obliges the Applicant to obtain approval from the relevant planning authority on the quantum of trial trenching may result in an impediment to the delivery of the Scheme. Therefore,

		31. LCC proposes a more detailed requirement as follows: *"(1) No development may commence until an overarching Archaeological Mitigation Strategy has been submitted to and approved by the relevant Planning Authorities, such approval to be in consultation with Historic England;* *(2) No phase of the authorised development may commence, and no part of the permitted preliminary works for that phase may start, until a supporting Written Scheme of Investigation for that phase has been submitted to and approved in writing by the relevant Planning Authorities, such approval to be in consultation with Historic England.* *(3) The approved scheme must— (a) identify areas where archaeological work is required; and (b) the measures to be taken to protect, record or preserve any significant archaeological remains that may be found (i.e. preservation in situ, preservation by record or mix of these elements).* *(4) Pre-construction archaeological investigations and pre-commencement material operations which involve intrusive ground works may take place only in accordance*	the Applicant's strong preference is for the quantum of trial trenching to be approved by the Secretary of State. Notwithstanding, the Applicant's position set out above, the Applicant considers that it is unusual for Historic England to comment on archaeological WSIs produced to mitigate impacts on non-designated heritage assets as part of the planning process, and where there is no potential for direct impacts on any designated heritage assets as a result of the Scheme. Historic England's remit is usually focused on designated heritage assets as detailed by the Historic England Proposals for Development Management[1]. This is reflected in Historic England Advice Note 7 (Second Edition)[2] Paragraph 27, which states: *"Non-designated heritage assets may also be identified by the local planning authority during the decision-making process on planning applications, as evidence emerges. Any such decisions to identify non-designated assets need to be made in a way that is consistent with the identification of non-designated heritage assets for inclusion in a local heritage list, properly recorded, and made publicly available, for instance through an addition to a local heritage list, and through recording in the Historic Environment Record (HER)."*

[1] https://historicengland.org.uk/services-skills/our-planning-services/charter/when-we-are-consulted/proposals-for-development-management/
[2] https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heag301-local-heritage-listing/

		with the approved Written Scheme of Investigation and any archaeological works must be carried out by a suitably qualified and competent person or body previously notified to the relevant planning authority"	Therefore, the Applicant questions LHPT's suggestion that it would be necessary to consult with Historic England on the approval of any overarching WSI, specifically as part of this Scheme, and why LHPT would need to consult with Historic Engand regarding the mitigation of impacts on non-designated heritage assets. The Applicant believes LHPT should be sufficiently able to govern works required to mitigate any potential impacts to non-designated heritage assets.
LCC-13		32. Requirement 21 : needs a clause which requires notification and the submission of a scheme in any event 12 months before the date in part (1) i.e. at year 59.	Please refer to agenda item 6i and Action Point 2 in **C8.1.5 Written Summary of the Applicants Oral Submissions at the Issue Specific Hearing 1 [REP-051].**
LCC-14		33. Part (3) of requirement 21 does not work well. "within 12 months of the intended date of decommissioning" if the intention is to provide a scheme 12 months prior to the date of decommissioning then it should say so. "within 12 months" could mean 1 week before.	The Applicant notes that the drafting of Requirement 21(3) has been changed to *'no later than ten weeks prior to'*. Please refer to the **Draft Development Consent Order [EN010133/EX4/C3.1_F]** submitted at Deadline 3.
LCC-15		34. Schedule 17 (5) Fees for discharge – advice note 15 suggested drafting for this provision includes space for the insertion of a set fee. This is proposed here and LCC suggests.	The Applicant confirms that the fees proposed by LCC are agreed and has updated the **Draft Development Consent Order [EN010133/EX4/C3.1_F]** submitted at Deadline 4 accordingly.

		(1) Where an application is made to the relevant planning authority for written consent, agreement or approval in respect of a requirement discharge, a fee is to apply and must be paid to the relevant planning authority for each application. (2) The fee payable for each application under sub-paragraph (1) is as follows— (a) a fee of £2,535 for the first application for the discharge of each of the requirements 5, 6, 7, 8, 9, 11, 13, 14, 15, 18, and 19, and 21; (b) a fee of £578 for each subsequent application for the discharge of each of the requirements listed in paragraph (a) and (c) a fee of £145 for any application for the discharge of— (i) any other requirements not listed in paragraph (a); and (ii) any approval required by a document referred to by any requirement or a document approved pursuant to any requirement.	

Sturton by Stow Parish Council [REP3-051, REP3-052, REP3-053]

Reference	Theme	Summary of Issue Raised	Applicant's Response

SSPC-01		**Issue Specific Hearing Tuesday 5th December** The statement made regarding no agricultural land loss is reliant on decommissioning of the project and that land being returned to agricultural use. If the project is decommissioned and the land is subsequently reclassed as brownfield then the agricultural land will be lost. Can the dDCO include a commitment to RESTORE the land to agricultural use and not allow reclassification of the type of land? The applicant has stressed that agricultural land is not being lost – even though it will not be used for agricultural purposes.	The National Planning Policy Framework provides a definition of brownfield land or previously developed land in Annex 2 as follows: "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape." The use of the land for solar development and associated infrastructure for a period of 60 years would not meet the above definition as it is not permanent and the land cannot, therefore, be reclassified as 'brownfield' or 'previously developed land'. The Applicant has also committed to restoring the land and this is set out in the **Outline Decommissioning Statement [REP3-014]** which is secured by Requirement 21 in the **Draft Development Consent Order [EN010133/EX4/C3.1_F]**.

SSPC-02		**Open Floor Hearing Thursday 7th December** The reference made regarding manufacturing process and potential conflicts with how the workforce is treated was treated with substantive disregard by the applicant's counsel. When an individual purchases any product, that individual can understand where it is manufactured and will make their purchase with this knowledge. Freedom of choice. When consuming electricity, it is generated using many forms but ultimately arrives at the point of consumption without any input from the end user. Therefore, the provenance and manufacturing process involved for solar panels assessment is imperative and should not be dismissed under the guise that when individuals purchase goods no thought is given to how the said goods are manufactured. This project is nationally significant the SoS will be making a decision on behalf of the government and, by default of election to post, the residents of this area. The way solar panels are manufactured then becomes the responsibility of the government by way of consent of this project. The point is important and has implications at governmental level for responsibility of welfare at every level of manufacture and production.	Please refer to the response given for comment GEN-08 of **C8.1.19 The Applicant's Responses to Written Representations Part 3 [REP2-051]**.

SSPC-03		**Issue Specific Hearing – dDCO Friday 8th December.** **Time-limit** The absence of a time-limit in the dDCO will mean that the 'temporary' project is subject to becoming permanent by constant replacement of panels and therefore the project time-line can be extended due to the continued operation of the replacement panels.	The operational time limit of the Scheme is up to 60 years and is secured by Requirement 21 in Schedule 2 of the **Draft Development Consent Order [EN010133/EX4/C3.1_F].**
SSPC-04		**Decommissioning** With comment regarding timing of decommissioning there is already wording in the Burbank DCO regarding decommissioning due to abatement of works. This point has already been made in prior submissions.	Please refer to SSPC-20 in C8.1.17 The Applicants Responses to Written Representations Part 1 **[REP2-048]**.
SSPC-05		**Hedgerows** Regarding hedgerows can a maximum width be specified within the dDCO? There should have been ground surveys already made where the indicative access points are. The hedgerow along Thorpe Lane, Sturton by Stow is not within the solar array but has been identified within the dDCO. Could any part (or all) which may need to be removed be highlighted please.	Paragraphs 1.2.3 and 1.2.4 of **C7.3_E Outline Landscape and Ecological Management Plan [EN010133/EX4/C7.3_E]** provide ranges of lengths of temporary and permanent hedgerow removal. This will be secured by Requirements 7 of Schedule 2 of **C3.1_F Draft Development Consent Order [EN010133/EX4/C3.1_F]**. In relation to the hedgerow on Thorpe Lane (H275), please refer to the Applicant's response to Action Point 4 within **Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 5 and Responses to Action Points [REP3-038]**.

West Lindsey District Council [REP3-054, REP3-055, REP3-056, REP3-057]

Reference	Theme	Summary of Issue Raised	Applicant's Response
WLDC-01		**ISH2** **The Historic Environment** *The effect on the significance of Thorpe Medieval Settlement Scheduled Monument (SM), including the setting, boundaries, the proximity of the solar arrays and mitigation, as well as the most up to date position with Historic England.* WLDC note the position of Historic England (as stated in their Relevant Representation (REP065)) and concur with the comments made, and position adopted. The impacts of the proposed development upon the Thorpe Medieval Settlement (NHLE ref. 1016978) have been assessed in the applicant's Environmental Statement to be 'moderate adverse', which is 'significant' in EIA terms. WLDC considers this impact to be a considerable level of less than substantial harm for the purpose of assessing the proposed development against paragraph 5.9.27 and 5.9.32 of NPS EN-1 (2023) in that such harm should be weighed against the public benefits of the proposal. WLDC note and concur with Historic England's conclusion that the 50m buffer applied to the north of	The Applicant's approach to the mitigation of effects to the significance of Thorpe Medieval Settlement (NHLE ref. 1016978) is set out within the Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 2 [**REP3-033**] and in ExQ 1.9.9 of the Applicant's Responses to ExA First Written Questions ExA [**REP2-034**]. In summary, discussions were undertaken with Historic England during the pre-examination phase to identify if any impacts to aspects of the setting of Thorpe medieval settlement SM (NHLE 1016978), that contribute to the significance of the asset, could be reduced. Details of these discussions are provided in the Statement of Common Ground **[REP-065]**. As stated in paragraph 13.8.10 of ES Chapter: 13 Cultural Heritage **[APP-048]**, embedded mitigation to reduce the impacts on the setting of the SM comprises setting back the proposed solar panels 50m from the northern edge of the Scheduled Area. The option of setting panels back to a former historic east-west boundary recorded on the 1886 25-inch Ordnance Survey (OS) has been discussed with Historic England. While Historic England consider this to be

		the Scheduled Monument is insufficient and does not address the impacts caused by the proposed development to the significance of the monument. Historic England have provided a recommendation that solar panels are removed between the Scheduled Monument and the former historic east-west boundary (as recorded on the historic map provided by Historic England in their Deadline 2 submission). Based upon the proportionately small area of land affected by this request, WLDC considers it a wholly reasonable solution to ensure statutory and policy requirements are satisfied. Should the applicant decline to amend the proposed development in the manner requested by Historic England, WLDC consider this to be an issue upon which the application should be refused development consent.	necessary to preserve the transient historic landscape character that contributes to the setting of the Scheduled medieval settlement (please see the Statement of Common Ground **[REP-065]** for full details), the Applicant considers that the former east-west field boundary belongs to a post-medieval landscape, and as such setting the panels back to this location would not contribute further to the significance of the Scheduled medieval settlement. Neither does the Applicant consider that Historic England's proposed set back would enhance the experience of the heritage asset or reduce the impact compared with what has already been achieved by the mitigation set out in paragraph 13.8.10 of ES Chapter: 13 Cultural Heritage **[APP-048]**. Further details on this matter are included within the Statement of Common Ground **[REP-065]** and remain under discussion with Historic England.
WLDC-02		*The potential for disturbance to archaeological remains, in particular during the construction phase; and* *The approach set out the Archaeological Mitigation Written Scheme of Investigation.* As the local authority responsible for archaeology, WLDC defer to Lincolnshire County Council on such matters.	The Applicant notes this comment.

WLDC-03		**Agriculture and soils** *Written Ministerial Statement (March 2015)* The Written Ministerial Statement (March 2015) has not been revoked and remains an important and relevant matter for consideration in determining the Cottam Solar Project under section 105 of the Planning Act 2008. The publication of the update National Policy Statement EN-3 (to be ratified by Parliament early 2024) has the effect of providing updated policy with regard to the impact of solar farm development on agricultural land classification and land type. WLDC acknowledge that this updated policy must be read in context with the Ministerial Statement and provides the most recent policy where any conflicts between the two arise. WLDC maintain that both the Ministerial Statement and the updated NPS both require solar projects to be sited on poorer quality land and that applicants are required to explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land. WLDC also note the Applicant's clarification that the environmental assessment does not rely upon the grazing of livestock.	NPS EN-3 (November 2023) in paragraph 2.10.29 under the heading 'Agriculture land classification and land type' notes that land type should not be a predominating factor in determining the suitability of the site location, and that where agricultural land is shown to be necessary, poorer quality land should be preferred to higher quality land. The guidance is therefore clear that when use of agricultural land is necessary, the use poorer quality land is not required, but preferred. Referring to Table 19.10 of Chapter 19 [REP-010] it is clear that the majority of agricultural land within the site is ALC Grade 3b, not best and most versatile land. With only approximately 4.1% of the Sites being best and most versatile land, the Applicant's site selection process has preferred poorer quality agricultural land.

WLDC-04		**Landscape and visual – LVIA** WLDC noted that the applicant stated that there will be no further updates on the LVIA, however cumulative updates may be provided (e.g. to reflect the 60 year consent timescale now being sought by the Applicant). Notwithstanding the Applicant's stated position that the proposed development would have a beneficial impact due to the reinforcement of field boundaries, WLDC maintain a strong disagreement to this conclusion both in terms of landscape character and visual effects. WLDC still does not have clarity on how the Applicant has reached a conclusion that beneficial effects on the landscape will occur as a consequence of the proposed development. The Applicant merely stated that the conclusion is reached through professional judgement, however how that judgement has been reached was not reasoned. WLDC does not understand how an assessment of the impact of circa. 900ha of solar panel arrays and associated electrical infrastructure upon a baseline defined by agricultural fields can reach a conclusion that the character of that landscape will be improved has been reached. The implications of the conclusion are that the current landscape character and visual qualities are inferior to that which would be	The approach to the identification of significant beneficial effects on landscape character is set out within the Written Summary of the **Applicant's Oral Submissions & Responses at Issue Specific Hearing 2 and Responses to Action Points [REP3-033].** Please refer to Appendix 1 of this document, which sets out how the conclusions on beneficial effects within the LVIA are guided by five key factors or baseline considerations: 1. Landscape value 2. The context of EN-5 3. Use of GLVIA3 4. Professional opinion and experience in delivering large scale infrastructure projects; and 5. Published landscape character assessments. The Applicant has provided a further update on the identification of significant beneficial effects on landscape character since it was requested that LCC and the Applicant provide a joint statement regarding the weighting of the significance of the positive impacts of mitigation on landscape. Two meetings were held on Thursday 4th January and Monday 15th January 2024 with Lincolnshire CC at which these matters were discussed. Whilst the Gate Burton scheme does share some landscape character areas with the Cottam Solar

		experienced should the proposed development be inserted into the landscape. WLDC is unable to understand how the logic of a professional judgement can be applied to reach that conclusion. WLDC considers that the introduction of circa. 900 ha of rows of solar panels and utilitarian structures into currently pleasant open fields with a strong rural character would represent a significant change to the landscape character and visual effects. Such effects would clearly be at odds with the current landscape character and rural surrounding and would therefore have a significant adverse impact. Such conclusions were reached in the ES supporting the Gate Burton project, with which WLDC agreed. This is evidenced in the Joint Report on Interrelationships, which demonstrates the wide variation between adverse and beneficial impacts concluded by different project ES'. The wide disparity in conclusion results in there being no clear, consistent or reliable cumulative assessment to inform the decision maker. The current differentiation currently leaves the decision maker in the position of having choose which conclusions they consider valid and which ones are invalid. During the Hearing, WLDC does not consider that the Applicant adequately explained the process by which professional judgement was applied. As a	project, the Gate Burton scheme is a singular site located partially within the Laughton Wood Area of Greater Landscape Value (AGLV). The Cottam Solar Project is not located within an AGLV and is comprised of a series of disparate sites that are separated with tracts of land and with landscape features between that assist with its integration and assimilation into the landscape. There is no direct comparable position with the Gate Burton solar project as this Scheme has a different baseline or starting point. As set out above, Gate Burton occupies (in part) a landscape that affords local designation (AGLV), whereas the landscape at Cottam is not nationally or locally designated. The landscape at Cottam is subject to a notable pressure for change from its predominant use as agriculture and the bench line or starting point for the landscape baseline affected by these sensitivities is associated with this condition and quality. The benefits to landscape character have the scope to restore the landscape baseline. The Environmental impact Assessments for each of the Schemes have been undertaken independently, and different impact assessments can reach different conclusions. The differences between the conclusions of the Cottam Solar Project LVIA and the one undertaken for the Gate Burton Energy Park are not unexpected given the elevated value of the receiving

		consequence, WLDC's position is that there are significant uncertainties in the Applicant's LVIA that should not be relied upon.	landscape at Gate Burton compared to Cottam, and the difference in approach to design and mitigation between the two schemes.
WLDC-05		**Good design** WLDC was not provided an opportunity to comment on matters of design, however maintain their objections in this regard as set out in its LIR, Written Representation and response to ExA question 1.2.28 within ExQ1s.	Please refer to the Applicant's response to matters of design as set out within WLDC ExA question 1.2.28 of the **Applicant's Response to Deadline 2 Submissions [REP3-03]**.
WLDC-06		**ISH3** **Socio-Economics** *Local employment benefits, in particular in areas of deprivation and the role/deliverability of the Outline Skills, Supply Chain and Employment Plan [APP-349]* WLDC expressed that the terminology used in the Outline Skills, Supply Chain and Employment plan should provide more commitment to the mitigation proposed within it. Clarity around the approach to monitoring in particular would be welcomed.	The Applicant will provide the measures set out in **C7.10 Skills Supply Chain and Employment Plan [APP-349]**, secured through Requirement 20 of Schedule 2 to **C3.1_E Draft Development Consent Order [EN010133/EX4/C3.1_E]**.
		Assessment/ effect on the wellbeing of local residents, in particular during the operational phase. WLDC reiterated its concern that the impact of the proposed development upon the wider agricultural sector (including supply chain) has not been assessed.	Please refer to the response given for comment WLDC-64 of **C8.1.17 The Applicant's Responses to Written Representations Part 1 [REP2-048]**.

WLDC-07		**ISH4** **Cumulative Effects** *Summary of other projects included in the cumulative assessment* WLDC confirmed the list of projects identified are correct for the purpose of the cumulative assessment.	The Applicant notes this comment.
WLDC-08		**Whether there are any changes to the information on other projects.** WLDC note that the Applicant intends to update the Joint Report on Interrelationships (JRI) to reflect the current information available. WLDC also question the status of the Report as part of the examination and the DCO. It does not represent an additional/updated environmental assessment, it is not secured through any DCO 'requirement' and does not have the status as a Certified Document. With the applicant referring to the document to justify impacts and mitigation, this reliance indicates that it should be secured as a control document to ensure commitments are delivered. If the Report is not to be treated in this manner, its contents must be included within relevant application documents and clearly signposted where they are secured by the JRI. WLDC requested clarification on the extent to which representatives of the Gate Burton project will remain	The **Joint Report on Interrelationships (JRI) [REP3-026]** is intended to provide an update to the cumulative assessment in a targeted and focused manner, based on developments as between the promotors of the relevant Solar NSIPs. Where the JRI identifies opportunities for further mitigation, such as the production of a joint Construction Traffic Management Plan, this is added to the relevant control document: see the **outline Construction Traffic Management Plan (Rev B) [REP3-007]** at paragraph 2.7.1. The Applicant confirms that the promotors who are party to the JRI, including Gate Burton, will continue to be involved in each update to the JRI. The approach to collaboration is set out in section 3 of the **JRI [REP3-026]**, including how each iteration of the JSI was approved by all parties. All parties will continue to be involved in each iteration of the JRI in the same manner.

		involved in the Report as it progresses through this examination. The Applicant confirmed that the Gate Burton project will remain involved with regard to agreements on amendments. WLDC notes that the applicant confirmed that the JRI will continue to be updated, which will result in different reports being considered for different examinations. This undermines the purpose of the document, which is to provide consistent information on the cumulative impacts assessed by each project. WLDC questions whether there is it will be necessary for the JRI to be updated following the close of the respective examinations to ensure consistency. The current disparity in professional judgements (in relation to LVIA in particular) results in uncertainty as to which conclusion on impacts are correct for the purpose of determining the application. This disparity leaves the decision maker in a position of having to decide which ES is correct and which is incorrect when considering cumulative impacts; a situation that WLDC find unacceptable given the magnitude of impacts that would arise from the three NSIP applications.	Following the close of Examination, the Applicant will ensure that further iterations of the JRI are submitted to the Planning Inspectorate so that they may be taken into consideration by the Secretary of State. This will ensure that the Secretary of State has regard to the latest version of the document at the time they determine whether to grant development consent for the Scheme. Please refer to the response given for comment WLDC 22.1 to 22.5 in the **Applicant's Response to Local Impact Reports [REP2-047]** in respect of the independent Environmental Assessments and the cumulative impact of the solar NSIPs, including in relation to LVIA.
WLDC-09		**Climate change** Due to the cumulative assessments in the Gate Burton, Cottam and West Burton Environmental Statements not aligning, it is not possible to assess the conclusions.	It is accepted that the different conclusions from the different assessments are reliant on different professional judgement and interpretation of the relevant guidance to make these judgements. The

		This will be further problematic if the assessments are changed throughout the examination.	Environmental Statements for each NSIP solar scheme all conclude that there would be a positive effect on climate change from the relevant development when assessed in isolation. The **Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision B [REP2-010]** reviews the latest environmental information for each relevant scheme, finding no changes to the conclusions of each individual assessment when reviewed cumulatively.
WLDC-10		**Agriculture and Soils** WLDC requested that this ES chapter is required to be updated to align with the JRI.	Please see the Applicant's response to Second Written Question 2.4.2 **[EX4/C8.1.30].**
WLDC-11		**Transport** WLDC expressed its concern about how construction traffic will be managed in the event that two or more projects are constructed at the same time (in parallel or overlapping). WLDC are seeking an approach to co-ordination to be secured in the Outline Construction Traffic Management Plan. Securing principles at this stage are important given the likely impact of construction traffic on communities and the need for consistency in both commitment and technical approach to a joint co-ordinated approach across projects.	As set out in response WLDC 6.1 to 6.5 in the **Applicant's Response to Local Impact Reports [REP2-047]**, the Gate Burton, Tillbridge, West Burton and Cottam developers are working together to minimise construction impacts as detailed within **WB8.1.9_B Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision B [REP2-010].** **6.2.14 ES Chapter 14: Transport and Access [APP-052]** and **8.4.14.1 ES Addendum Chapter 14: Transport and Access [REP1-074]** conclude that there are not expected to be any significant effects in relation to Transport and Access as a result of the construction of the Scheme.

			Construction traffic impacts will be managed through the **Outline Construction Traffic Management Plan [EN010132/EX4/WB6.3.14.2_E]** which is secured through requirement 15 of the draft Development Consent Order **[EN010132/EX4/WB3.2_F]** . The **Construction Traffic Management Plan [EN010132/EX4/WB6.3.14.2_E]** sets out that there is the potential for a joint CTMP post-consent once further details in relation to Gate Burton and Cottam are known.
WLDC-11b		**WLDCs position on the approach to cumulative assessment** WLDC reiterated its request for an assessment of various combinations of projects to be carried out and not just a reliance upon a 'worst case' assessment of all projects taken together. WLDCs position is that, in the event that all three of the current projects in examination (Cottam, Gate Burton and West Burton) are determined at the same time by the Secretary of State, the environmental information provided only allows for three decision options to be made: i. To grant consent for a single project only; or ii. To grant consent for all three projects; or iii. To refuse consent for all three projects.	Please refer to item 3 in the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 [REP3-035].** The **Joint Report on Interrelationships [REP3-026]** seeks to provide clarity on the environmental impacts of each solar NSIP and the interrelationships between these.

		During Issue Specific Hearing 4 'Cumulative Effects' (06/12/2023) this position was fairly described as an 'all or nothing' scenario by the ExA, a definition to that WLDC considers appropriate. WLDC have consistently requested that the cumulative assessments for all projects assess the various combinations between them. Such an assessment would allow the decision maker, in the event that they find all three projects unacceptable, to consider whether two projects could be granted. Based upon the current approach, such a decision is unable to be made due to the lack of environmental assessment to demonstrate the comparative impacts between each combination to allow a reasoned judgement to be made. WLDC noted the request by the ExA to agree a position with the Applicant through the Statement of Common Ground. WLDC have provided the Applicant with initial wording for continued discussion.	
WLDC-12		**ISH5 – Draft Development Consent Order** *Requirement 21 - The Applicant will be asked to provide further justification for the 60 year period included in Requirement 21. The Applicant will also be asked to signpost where in the ES it is stated that the scheme was undertaken on the basis that it would not be time limited.*	The Applicant's position is set out in **Review of Likely Significant Effects at 60 Years [REP2-058]** and the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 [REP3-035]**. The Applicant confirms that the assessment methodology underpinning this review is as set out in **Chapter 2: EIA Process and**

		WLDC submits that the ES is clearly assessed on the basis of a temporal period of 40 years, and as such that Requirement 21 should reflect, and be in line with, the environmental impacts which have been assessed. Express reference is made to a 40 year assessment period in the following parts of the ES: Chapter 4 "Scheme Description" para.4.2.3 para. 4.3.6(b) Chapter 8 "Landscape and Visual Impact Assessment" (Nov update) Para. 8.4.18 Chapter 9 "Ecology & Biodiversity" Para. 9.4.7 Para. 9.6.3 Para. 9.6.6 Planning Statement (D2 submission) Para. 3.3.11 WLDC considers that the 'Review of Likely Significant Effects at 60 Years' [REP2-058] fails to sufficiently set out the methodology applied, and reasons why, certain conclusions have been reached in respect of the changes to the assessment. The Review does not give adequate depth or explanation as to why a 50% increase in the operational lifetime of the development	**Methodology [APP-037]** and, where applicable, the relevant chapter of the Environmental Statement. The date of decommissioning for the purposes of Requirement 21 of the **draft Development Consent Order [EN010133/EX4/C3.1_F]** is the date when that part of the authorised development permanently ceases to generate electricity on a commercial basis. The Applicant does not consider it to be necessary or appropriate to impose a time limit of 12 months as there could be a wide range of reasons (including those beyond the Applicant's control) that could result in a temporary period where part of the authorised development is required to cease generating with generation then recommencing. The ongoing maintenance of the Scheme is secured by Requirement 14 of the **draft Development Consent Order [EN010133/EX4/C3.1_F]** through the **C7.16 outline Operational Environmental Management Plan [REP3-022]**, including regular inspections and replacement of equipment as necessary. This will ensure that the Scheme is maintained until it is decommissioned.

		is now being sought, mid-examination. At paragraph 1.1.4 the Review states "A 60- year period has been chosen to provide flexibility for the Scheme to continue operating where the solar PV panels continue to generate electricity after the average lifespan of 40 years has passed." If the development would now exceed the "average lifespan" WLDC invites the Applicant to clarify whether this would equate to a greater failure of equipment (batteries, solar panels etc.) and would therefore lead to a greater need for replacement equipment and increased waste. In its current form WLDC submits that insufficient detail is provided to justify the conclusions, especially where there is a reliance on professional judgement. WLDC requests that the Applicant reviews and provides a more detailed assessment. In particular, WLDC requests that the methodology and reasons in respect of assessment that are based upon the 40 year period are clarified and updated where required. Such ES chapters include: Chapter 2: EIA process and Methodology Chapter 4: Scheme Description Chapter 7: Climate Change Chapter 9: Ecology and Biodiversity	

		Chapter 18: Socio-Economics. WLDC also considers that a mechanism should exist in Requirement 21 either to automatically trigger decommissioning if the project ceases to generate energy for a period of 12 months; or, in the alternative, to trigger a review mechanism whereby the relevant determining authority is notified that energy generation has ceased, the reasons why it has ceased, and when it will continue to generate energy. The review mechanism would preclude the automatic triggering of decommissioning but would provide the relevant determining authority with the power to determine that decommissioning should occur if the energy cessation is continued without good reason and/ or an intention or plan to reinstate generation. This safeguards against the physical continuation of a project that is not producing energy (i.e. resulting in the continued disbenefits of the project without the disbenefits). WLDC are happy to propose wording depending on the Applicant's response.	
WLDC-13		**Schedule 2 – Requirements** WLDC considers that a phasing requirement should be included in the dDCO, which is also reflected in the wording of other requirements. WLDC also submits that requirements 6, 8, 9 and 20 should have retention clauses.	The Applicant understands that WLDC's reasoning for a phasing requirement is so that it has better oversight of the construction programmes for all of the proposed solar developments in its area. The **draft Development Consent Order [EN010132/EX4/WB3.2_F]** has been updated to

		WLDC understands that the control documents may require maintenance or retention but considers that their retention should be secured in the dDCO. The implementation of those documents, as currently drafted, does not necessarily equate to their retention.	include a requirement to submit information regarding phasing. The Applicant does not consider that additional wording about maintaining or retaining the management plans is necessary within the Requirements. The implementation of the management plan inherently includes compliance with all ongoing measures contained within the plan. The Applicant does not propose to add the unnecessary wording to Requirements as this would be unnecessary duplication and contrary to the principles of statutory drafting.
WLDC-14		**Requirement 9 – Biodiversity net gain** WLDC considers that a minimum percentage of BNG should be secured in the dDCO that reflects those asserted in the oLEMP. WLDC considers that the approach taken in the Longfield DCO Correction Order addresses concerns about the biodiversity metric changing.	Please see the Applicant's response to Second Written Question 2.1.9 **[EX4/C8.1.30]**
WLDC-15		**Schedule 17 – Procedure for discharge of requirements** WLDC objects to the inclusion of a deemed consent provision. Due to the scale and potential complexity of the details and their importance to ensure that mitigation for a large scale infrastructure project is assessed and implemented, it is wholly unacceptable to	Please refer to the response given to 1.1.25 in the **Applicant's Responses to ExA First Written Questions [REP2-034]**. If WLDC has concerns about an application for approval submitted under Schedule 17 to the **draft Development Consent Order [EN010132/EX4/WB3.2_F]**, then it can either refuse the

		impose a deemed consent provision. Additionally, with the potential cumulative impact of having to process subsequent approvals for several similar projects, it is essential that WLDC has sufficient time to make well informed decisions in the public interest. The deemed consent provision also has an impact on WLDC's position with regard to the approval timescales discussed below. Should the deemed consent provision be retained, WLDC consider that a longer determination period is proportionate. The timescales WLDC considers to be acceptable are influenced by whether a deemed consent provision is included in the DCO. If it is retained, a longer period of time is required to enable WLDC to fulfil its duties in the determination of subsequent applications that relate to EIA development. Consistent with the reasons that WLDC object to the deemed consent provision, it is essential that WLDC has reasonable time to interpret, assess, have regard to consultee representations, negotiate and formally determine complex and technical details that are required in order for the project to be acceptable. WLDC's position on the timescale are therefore: Should there be no deemed consent provision, WLDC request that the following timescales be specified:	application or request further information. The deemed approval process is designed to prevent the Scheme being delayed where WLDC fails to take any action. A deemed approval in such circumstances is considered proportionate and necessary for a nationally significant infrastructure project with a fixed grid connection date. It is noted that a deemed refusal applies under paragraph 2(5) of Schedule 17 where the application is likely to give rise to any materially new or different environmental effects. Approval timescales have been extended to address concerns raised by WLDC. These have been extended to 10 weeks as per the other solar projects in this area and this is considered to be proportionate to balance the competing needs of WLDC and the Scheme. The Applicant has amended Schedule 17 to the **draft Development Consent Order [EN010132/EX4/WB3.2_F]** to include revised drafting on fees proposed by LCC. The Applicant understands that this drafting is also acceptable to WLDC.

		Requirement 5 = 13 weeks Other Requirements = 10 weeks Should a deemed consent provision be retained, WLDC request that the following timescales be specified: Requirement 5 = 16 weeks Other Requirements 13 weeks The above timescales allow a reasonable and proportionate timescale in order to assess and determined typically complex and 'new' information relating to a large scale EIA development. WLDC also considers that the drafting of Article 46.5, the fees provision, should be updated to reflect the Applicant's oral statements in ISH5, in particular that it is intended to require a payment for each discharge requirement application, irrespective of whether that application deals with the discharge of that requirement for the entirety of the project or just a part of it. Schedule 17 (5) Fees for discharge – with due regard to Advice Note 15 WLDC considers that, due to the scale and complexity of the details for which subsequent approval will be sought, a set fee for specific requirements is reasonable and proportionate. WLDC suggests the following	

		(1) Where an application is made to the relevant planning authority for written consent, agreement or approval in respect of a requirement discharge, a fee is to apply and must be paid to the relevant planning authority for each application. *(2) The fee payable for each application under sub-paragraph (1) is as follows—* *(a) a fee of £2,535 for the first application for the discharge of each of the requirements 5, 6, 7, 8, 9, 11, 13, 14,15, 18 , 19 and 21;* *(b) a fee of £578 for each subsequent application for the discharge of each of the requirements listed in paragraph (a) and* *(c) a fee of £145 for any application for the discharge of—* *(i) any other requirements not listed in paragraph (a); and* *(iii) any approval required by a document referred to by any requirement or a document approved pursuant to any requirement.* WLDC will continue to engage with the applicants and LCC to seek to agree final wording of this provision	

Canal & River Trust [REP3-058]

Reference	Theme	Summary of Issue Raised	Applicant's Response
CRT-01		We have been reviewing the revised Concept Design Parameters and Principles document and welcome the principle that HDD will be at least 5m below the River Trent. We think it would be helpful to include in this description a reference point for measuring that 5m. The Trust has agreed the following wording with the Gate Burton project, which is set out in the Outline Design Principles document for that project: *The HDD depth will be a maximum of 25m below the bottom of the riverbed and a minimum of 5m below the lowest surveyed point of the River Trent riverbed in order to prevent risk of any scour exposing cable.* The Applicant has confirmed to us that they are happy to use the above wording for the Cottam proposal and this will be updated in the next version of the Concept Design Parameters and Principles submitted at Deadline 3.	The Applicant confirms that the agreed wording has been included in **C7.15_B Concept Design Parameters and Principles [REP3-020]** submitted at Deadline 3. Please see the final row of Table 2.5 in that document.
CRT-02		We note that we are included in the answers to ExA Questions 1.10.21 and 1.11.12 and agree with this position.	The Applicant notes this comment.

Marine Management Organisation [REP3-059]

Reference	Theme	Summary of Issue Raised	Applicant's Response

MMO-01		ExA's Deadline 3: MMO's response to Written Representations and any comments on the Relevant Representations already submitted. The MMO will provide a full response for receipt of the ExA on Deadline 3A, 28th January 2024. This will also include our response to the comments on submissions for Deadline 3.	The Applicant notes this comment. In lights of without prejudice comments made by the MMO in respect of the Gate Burton Energy Park Examination and the West Burton Solar Project Examination, the Applicant has updated the Deemed Marine Licence in the **draft Development Consent Order [EN010132/EX4/WB3.2_F].**

Severn Trent Water [REP3-060]

Reference	Theme	Summary of Issue Raised	Applicant's Response
STW-01		Please be advised that, according to our records, there are no assets within the updated location plan. However, if you do indeed identify any assets you believe are the responsibility of Severn Trent Water, please consult with us in Asset Protection.	The Applicant notes this comment.

7000 Acres [REP3-064 and REP3-068]

Reference	Theme	Summary of Issue Raised	Applicant's Response
7A-01		**7000 Acres Supplement to Comments on Applicant's Response ExA's Q1, regarding updates to National Policy Statements**	Updates to the National Policy Statements have been considered in Section 5 of the Planning Statement **[EN010133/EX4/C7.5_D]**.

		Please refer to document [REP3-064] for the full text of the submission.	
7A-02		**7000 Acres Opinion On The Similarities Between The Statement Made by the Secretary of State For Communities and Local Government on 25 March 2015 and EN-3 (Updated November 2023)** Please refer to document [REP3-068] for the full text of the submission.	Updates to the National Policy Statements have been considered in Section 5 of the Planning Statement **[EN010133/EX4/C7.5_D]**.

7000 Acres – Comments on Responses to the ExA's First Set of Written Questions [REP3-067]

Reference	Theme	Summary of Issue Raised	Applicant's Response
7A-03		*1.1.2 In response to ISH1 action point 2 [REP051], the Applicant states that made it clear in ES Chapter 2: Process and Methodology and ES Chapter 4: Scheme Description that the Applicant was not seeking a temporary or time limited consent and the EIA was undertaken on that basis. Please can the Applicant signpost where this is made clear in the abovementioned documents.* 7000Acres- The Applicant refers to a document that justifies why extending the life of the scheme by 50% will have no additional impact – ES Chapter 23:Summary of Significant Effects [EN010133/EX2/C6.2.23_A] has been provided in the	The Applicant's position is set out in **Review of Likely Significant Effects at 60 Years [REP2-058]** and the **Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 [REP3-035]**. The assessment methodology underpinning this review is as set out in **Chapter 2: EIA Process and Methodology [APP-037]** and, where applicable, the relevant chapter of the Environmental Statement. The use of professional judgment is an established and acceptable method for undertaking an environmental impact assessment.

		Review of Likely Significant Effects at 60 Years [EN010133/EX2/C8.2.7]. 7000Acres believes this document is flawed and relies on "Professional Judgement" rather than quantitative evidence to support their claims. This view covers a number of Chapters of the ES, and was discussed at ISH 4, 1 December 2023, where WLDC also expressed concerns.	
7A-04		*1.2.25 . Please can the Applicant update the relevant ES assessments (and any supporting documents where required) to reflect a worst case scenario of a 60 year operational lifetime and decommissioning at 60 years. Can the Applicant explain if and how this has altered any assessments in the ES?* 7000 Acres has severe reservations, as noted in 1.1.2 over the Applicant's methodology and use of Professional Judgement, rather than evidence, to dismiss reasonable concerns.	Please refer to the Applicant's response to 7A-04 above.
7A-05		*1.2.26 Paragraph 7.8.39 of ES Chapter 7: Climate Change [APP-042] states that it is assumed the half of the construction materials would come from China and half would come from Europe. However, paragraph 7.8.41 states that the PV panels are expected to be sourced from China. Can the Applicant comment on what basis the*	The Applicant's maintains its position that it has assessed a reasonable worst case scenario. The assumption of the 50:50 split is based on a reasonable assumption of the production of **all** materials to be used for the Scheme. While it is expected that the solar panels to be used will be manufactured in China, more local materials will be used wherever possible including for example the mounting materials. This has resulted

		above assumption is made and explain how a worstcase-scenario has been assessed. 7000 Acres does not agree with the Applicant's response […] All the solar panels will be sourced from China. China is also the primary source for large utility scale batteries. There are no UK sources for batteries. In accordance with a Rochdale Envelope, and Advice Notice Nine, a reasonable worse case is that all solar panels and batteries will be sourced from China. The ES Chapter 7 must be updated to reflect this reasonable worse case and remove the current flawed assumptions.	in the assumption used for the purpose of completing the Greenhouse Gas calculations that the total of materials to be used on site have been assumed to come half from China and half from Europe for the purpose of calculating emissions from transporting materials to site.
7A-06		*1.3.1 The ExA notes that since the Applicant prepared its Statement of Need [APP350], 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 on the Applicant's needs case.* 7000Acres have submitted a supplement to this WR to comment on the "emerging" National Policy Statements at the same deadline, 19/12/2023, "Supplement to Comments on Applicant's Response ExA's Q1, regarding updates to National Policy Statements". This comments on the NPS which was published in	The Applicant maintains that at all times the responses it has made to questions raised by the ExA have been answered as fully and accurately as possible. 7000 Acres correctly identify that the November 2023 NPS EN-1 includes solar within the definition of Critical National Priority (CNP) infrastructure, and indeed at Paragraph 4.2.4 of NPS EN-1 (November 2023), explains that it has "*concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*", going on in paragraph 4.2.5 to explain that low carbon infrastructure for the purposes of this policy means "*for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion (that is, renewable generation, including anaerobic digestion and*

		November 2023, and describes the evolution of the draft policy since the dNPS referred to in the question. It is notable that, in the Applicant's response to the question, commenting on dNPS from March 2023 the Applicant set out what they saw as the "key points brought out in the 2023 edition documents", as being the level of support for solar and the need for new infrastructure. This is a clear example of partial information being provided by the Applicant, in that they chose to omit the key point that the March suite of documents introduced the concept of "Critical National Priority", which applied only to Offshore Wind. Following lobbying responses during the draft consultation, the definition of "Critical National Priority" has been watered down, such that all forms of low carbon generation are nominally CNP, including wind, solar and geothermal. In direct contrast to choosing to omit any mention of CNP in their reply to this question, following the later publication of the emerging NPS, the Applicant has repeatedly mentioned the inclusion of solar in the definition of CNP at Issue Specific Hearings and Open Floor Hearings. This shows that the Examining Authority must exercise extreme care when relying on the Applicant's material as evidence. Despite the watering down of the definition, the contributions of each technology within CNP will vary	*other plants that convert residual waste into energy, including combustion, provided they meet existing definitions of low carbon; and nuclear generation), as well as natural gas fired generation which is carbon capture ready*". 7000 Acres clearly does not agree with this policy and interprets this as a "watering down" of CNP infrastructure. However, the Government's intent is clear, all generating technologies are urgently needed to meet the Government's energy objectives (paragraph 3.3.59). Paragraphs 3.3.61 and 3.6.62 state "*The need for all these types of infrastructure is established by this NPS and a combination of many or all of them is urgently required for both energy security and Net Zero. Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*". The Government has repeatedly and consistently explained their view that "*a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar*" (most recently in the NPS EN-1 (November 2023) , paragraph 3.3.20). Paragraph 2.10.17 of NPS 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.*

		massively, given the climate and geology of the UK. It is only logical therefore, that the deployment of each should be considered in relation to the range of natural resources available to the country, their ability to contribute and the impacts associated with their deployment. While the NPS now includes planning guidance to facilitate NSIP-scale ground-mounted solar, the emerging NPS describes a typical solar farm as being 50MW. It is only solar developers that are advocating such large-scale schemes as Cottam. In terms of new network infrastructure, the Applicant's response subverts the argument. What is clear is the priority is to deliver network infrastructure to support offshore wind, as per the Electricity Commissioner's Report 2023. Therefore, in terms of grid infrastructure, every effort needs to be concentrated on delivering HV grid infrastructure to facilitate offshore wind. Misusing HV connections, resources such as supply chains and skills on schemes where there is no inherent necessity for there to be HV connections simply diverts precious resources and ultimately, undermines efforts to deliver decarbonisation. Section 4 of 7000Acres WR REP-117 explains that solar is generated at low voltages and has no inherent need to be deployed in a high voltage network (see also Grid Connection section in answer 1.3.5, below). The Applicant also acknowledges that	*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 development will inevitably have impacts, particularly if sited in rural areas*." It is therefore not correct to imply that NPS EN-3 is only supportive of 50MW solar schemes, it is instead providing an indication of the scale of a scheme that meets the threshold for requiring a development consent order. In relation to the use by the Scheme of Cottam substation, and comments made by 7000 Acres on the need for "network infrastructure to support offshore wind" the Applicant references pp10-11 and pp27-28 of the November 2023 Connection Action Plan (Ofgem / DESNZ) which clearly states the need to "better utilise existing network capacity". By using existing and available network capacity at Cottam substation, the Scheme is doing just that against a known and deliverable timeframe, when significant risks and uncertainties exist around technologies which are currently in development, or unproven, unconsented and unfunded and therefore are highly unlikely to deliver within the next decade, and may not deliver at all.

		dNPS EN-1 articulates the "prudence of planning infrastructure on a conservative basis". The Applicant recognises the scarcity of high-voltage, high-power grid connection points such as at Cottam, however chooses to occupy them for a solar scheme for 40-60 years (or more), for a technology that has no inherent need for a high-voltage connection. In the coming years, there are also Critical National Priorities to deliver new nuclear (such as small modular reactors) and low-carbon hydrogen production, which would require high-voltage, high-power connections. Notably, the uncontrolled use of such connections for solar schemes would sterilise these connections for decades and add further grid enhancements to an already overloaded programme of works in order to facilitate other technologies deemed to be CNP, but which cannot be disaggregated and deployed therefore cannot be deployed in other ways. Crucially, in terms of generation, the priorities for decarbonisation in the UK are seen as being deployment of offshore wind, nuclear and technologies to manage energy flexibility and intermittency of renewable energy sources (as evidenced by this year's reports from the UK Climate Change Committee, National Audit Office and the Business, Energy and Industrial Strategy Committee, further details are included in 7000Acres WR REP2-090). Sterilisation of strategically important grid	

		connections has the potential to impede these vital steps towards decarbonisation, which must also be deployed within 5-15 years, i.e. well within the lifetime of the proposed solar scheme. One final point in this question is with regard to "overplanting". This subject was discussed at length by the same Applicant at the West Burton Issue Specific Hearing 1?. It is clear within the NPS suite that overplanting is foreseen as a means of managing the degradation of solar installations over time, rather than to overcome the effect of low inherent yield of solar in the UK and thereby improve grid connection utilisation.	
7A-07		*1.3.2 Please comment on the implications for the Government's Net Zero and climate change commitments should the Proposed Development not be implemented.* It is acknowledged by the Applicant that grid connection capacity is relatively scarce. As a result, this scarcity must be considered when weighing how high-voltage, high-power connections such as to the Cottam substation are used. Should the Cottam scheme not go ahead, this would avoid the sterilisation of a grid connection that may be used for future alternative decarbonisation purposes, such as deployment of small modular reactors or hydrogen electrolysers.	See response to 7A-06 above.

		Please refer also to 7000Acres answer in REP2-095, section 1.3.2	
7A-07b		*1.3.3 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 Applicant refers to the Skidmore Review and acknowledges its recommendations for a "rooftop revolution" to deploy solar, as well as the call for a "taskforce and deployment roadmaps in 2023 for solar to reach up to 70GW by 2035". Despite this call for co-ordination and rooftop deployment, the Applicant is pushing ahead with a large-scale ground-mounted scheme. Presumably, the Applicant agrees with the principle of rooftop deployment, as long as it doesn't interfere with consent for their ground-mounted scheme. The current massive rush to ground-mounted schemes has the real potential to derail rooftop deployment at scale before any stirrings of a revolution. (See also the "Rooftop Solar" section in answer to Q 1.3.5, below)	The Applicant has explained its view on rooftop and brownfield schemes in previous submissions, e.g. in response to FWQ 1.3.5 (p76 [REP2-034]). The Applicant's position is that both rooftop and ground-mount solar are required to be deployed with urgency and are not considered as substitutes for each other. The Applicant agrees that solar on rooftops can contribute to the renewable energy mix for the UK, however, on its own it will not be sufficient, therefore large scale ground mounted solar is also needed. The Total Installed Capacity of solar in the UK is approximately 15GW (2010 – 2023). Despite changes to enable installation of solar panels without planning applications for many buildings and financial incentives, rooftop solar has not significantly grown since the cessation of the Feed in Tariff scheme in 2019. Comparatively, the Scheme together with the West Burton Solar Project would provide circa 1 GW of capacity, or 7% of the total current national installed solar capacity. The British Energy Security Strategy supports a near 5-fold increase in deployment of solar technology in the UK to 70 GW by 2035. This target is set recognising the abundant source of solar energy in the UK and that solar panels have reduced in cost by

		The Applicant states that rooftop solar would not diminish the need for the scheme, and that Section 7.6 of the Statement of Need describes why, however this section does not mention rooftop solar and offers no such explanation. It is noted that, in commenting on the Skidmore Review, the Applicant also fails to acknowledge points that materially relate to solar deployment at scale. For instance: • The Applicant fails to note the point made in the Skidmore Review that the aim should be that "projects are not imposed on local communities", as appears to be the case within West Lindsey, where there is overwhelming opposition to the proposed large-scale solar schemes. • The Applicant does note that the report recognises the "importance of local action and local plans" and that "people and places must be empowered to deliver net zero through a full alignment on a local level", however the Applicant does not appear to be able to reference any such empowerment or alignment in the case of their proposed scheme. • The Applicant fails to note that the Skidmore Review states that "solar farms in the countryside should not	85% over the last ten years. However, there are constraints that slow, or in some cases prevent, the rolling out of rooftop solar at scale. These constraints can be physical, e.g. a roof may not be strong enough to take a solar installation and may need to be replaced, or the roof may not provide the right pitch or may have features that prevent installation. Legal constraints may also prevent solar installation: there may be a landlord and tenant who are not aligned on using the roof space, and the scalability of rooftop solar means that deployment is likely to be slower and more costly than large-scale ground mount installations. Ultimately, the biggest roofs are likely to be of single MW scale. To deliver a total of 70 GW by 2035 from rooftop solar alone would require the installation of an enormous number of even the largest rooftop schemes. Each scheme would require its own distribution network connection but distribution network connections from DNOs may not always be viable, especially in urban areas if electricity systems are congested. Section 7.6 of Statement of Need [APP-350] describes how much land currently utilised by "industrial or commercial units" would need to be put to solar to meet national grid's view of anticipated needed solar capacity, before considering the suitability of the

		be planned piecemeal, but in a co-ordinated fashion as part of a Land Use Strategy". The Skidmore Review also takes a holistic view of decarbonisation, noting the interdependency between decarbonisation across different sectors, including energy, food, agriculture, nature and what all this means for land use. The Applicant has not addressed this point, despite the significant use of land which the scheme requires. Further commentary on the Skidmore Review is included in 7000Acres WR REP-117, Section 1.4.	location and aspect of each industrial or commercial unit, and concludes from this The Applicant maintains its conclusion, based on the analysis it has undertaken, that rooftop solar (including industrial and commercial roof space) is not on its own, sufficient to meet the urgent national need for solar generation to meet the UK's legally binding climate change targets.
7A-08		*1.3.5 Please respond to the points raised by 7000 acres in its WR [REP-117] in relation to the Applicant's Statement of Need [APP-350].* Comments on Applicant's summary response 7000Acres agree with the need for low carbon generation and acknowledge that the future energy system is likely to be composed predominantly of wind and solar, although it is worth highlighting that this is not an equal partnership. Within National Grid's Future Energy Scenarios, wind is likely to provide upwards of 70% of the UK's electricity needs by 2050, whereas solar will contribute between c.6% to c.10%. This figure is still necessary, but the Examining Authority must be clear about the contribution solar will be able to make.	Please refer to responses to 7A-06 and 7A-07 previously. In addition: The inclusion of batteries in the scheme provide flexibility to the electricity system and support the operation of the solar farm, by storing energy when it is abundant and releasing it when it is needed. P37 of Powering Up Britain Security Plan states that "The UK has huge deployment potential for solar power, and we are aiming for 70 gigawatts of ground and rooftop capacity together by 2035." Government sees both scales of solar development as essential to meet their aim, and recognise that "Ground-mounted solar is one of the cheapest forms of

		7000Acres also welcomes that the Applicant is now frequently referencing the 11% yield from solar installations in the UK, as has been raised by 7000Acres and other interested parties on numerous occasions. However, this transparent communication and should have been made clear at the outset to the public in consultation. The Applicant has avoided any reference to the importance of when power is produced or how it can be used, instead considering only energy in volume terms. In considering the overall usefulness in contributing towards decarbonisation not all energy is equal. For instance, the Applicant describes the advantage solar has over biogas in terms of energy volume – without acknowledging the versatility of biogas, in that it can be stored and transported, keys which unlock the decarbonisation of sectors such as transport and heating. By contrast, solar produces its volume of power in phase with time of day and time of year, which is frequently out of phase with demand. See Section 2.2 of 7000Acres WR REP-117. Regarding draft NPS EN-3, the applicant quotes the 2-4 acres per MW, but again fails to acknowledge that the document refers to a "typical" solar farm as having a capacity of 50MW. Clearly, some variability in the potential scale of projects is anticipated within the	electricity generation and is readily deployable at scale." - also p37 of the same document. Solar Capacity: please see response to 7A-07 above. Curtailment: The Applicant's response to REP-117 reads (Applicant highlighting): "Data from FES (2023) Table FL.18 shows that average curtailment in the years 2031 – 2040 ranges from 31TWh ('Leading the Way') to 46.8TWh ('System Transformation') however 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. Again, the inclusion of batteries in the scheme provide flexibility to the electricity system and support the operation of the solar farm, by storing energy when it is abundant and releasing it when it is needed and the Applicant refers the ExA back to its response to REP-117 as included in REP2-034 at p75 and following, including comments made in relation to solar's role within the future energy system. Connection of Solar to the Electricity System: the Applicant refers to Section 8.5 of C7.11 Statement of Need [APP-350] and specifically Para 8.5.7. Constraints in distribution networks are growing as the capacity of generators connecting to these systems (which were not designed for generation, but were designed for

		wording of dNPS EN-3, nevertheless, Cottam is at least 10 times the size of this "typical" scale solar farm, perhaps 15 or 16 times this size given overplanting by the Applicant. The Applicant presents the conclusion that "on their own, brownfield developments are unlikely to meet the national need for solar", making reference to the SoN, but any evidence to back up this assertion is missing and any serious consideration of alternatives to meet the Government ambition for solar is absent. 7000Acres do not argue that there should be no ground-mounted solar, just that rooftop solar should be planned to be deployed first, and any ground-mounted solar should be implemented where it can be decided upon locally and where the impacts can be minimised, reflecting the limited contribution solar can make. The Applicant also implies the Government has a "view that large scale solar must be deployed", whereas in fact, the Government has an ambition for 70GW of solar, without indicating an explicit requirement for large scale solar. What has been explicit is that the Government have been advised to deploy a "rooftop revolution" in the Skidmore review, consistent with other references for rooftop deployment. Sixth Carbon Budget	supply) grows. 7000 Acres' assertion that "deployment on rooftops needs no grid-scale infrastructure adjustments, and typically needs little or no adjustments to local distribution networks" may previously have been true, but as para 8.5.7 of APP-350 explains, this is not likely always to be the case, while the benefits of using a well-connected, existing and available transmission connection point for the scheme are clear (and are set out in the conclusions of Section 9.4 of C7.11 Statement of Need [APP-350]. The Applicant notes the comments on the Government's plan to develop a Land Use Framework but to date this has not been published.

		The Applicant has restated the need for solar, without addressing the key points raised by the 7000Acres WR, which is that there are exceptional pressures on land use in general, and cropland in particular, much of which come from the need to decarbonise, therefore the extensive and uncontrolled use of land for large scale ground mounted solar will only serve to exacerbate this problem, impeding requirements to plant 30,000-70,000 hectares of trees per annum and establish peatlands. In their analysis of land use for decarbonisation, the UK Climate Change Committee make no reference or allocation to land being used for extensive large-scale ground mounted solar. The Government has already been criticised for "overpromising" finite land with its multiple ambitions for land use in a report by the Royal Society on the subject of Land Use. The Government has recognised the competing tensions for land use and has committed to developing a Land Use Framework. The pressure on land use is also highlighted in the Skidmore review. The Applicant has focused solely on the 3a/3b debate, in terms of Agricultural Land Classification, and has failed to address the issue of overall land use, or acknowledge the role it is playing in exacerbating this situation. UK Energy Publications	

		The Applicant does not challenge the points made by 7000Acres in the WR, which note that solar is not part of the Government's 10-point plan for a Green Industrial Revolution (2020), and that the evolution of the landscape in relation to solar and its inclusion in policy is essentially in flux. In this shifting landscape and in the face of the many challenges, the Skidmore Review calls for a "taskforce and deployment roadmaps in 2023 for solar to reach up to 70GW by 2035". Such calls for a coordinated approach to decarbonisation are commonplace, also being cited in recent reports from the UK Climate Change Committee, National Audit Office and the Business, Energy and Industrial Strategy Committee, further details are included in 7000Acres WR REP2-090. The Applicant notes that no documents state that "large-scale solar is not required" and that no documents state that rooftops solar can on its own meet the solar capacity ambition. This is not the same as support. 7000Acres note that, while Skidmore and others call for a "rooftop revolution", there is an absence of an explicit call for an equivalent "ground-mounted gathering" of solar. For reference to the Skidmore Review, please see answer to Question 1.3.3 Solar Capacity	

		It is perhaps referencing error, but Section 7.6 of the Statement of Need does not provide an explanation why rooftop solar is not an appropriate solution for deployment at scale, nor does the Applicant's response address the transmission and conversion losses associated with deploying a low-voltage generating solution to a high voltage connection, away from demand centres, as highlighted in Section 4 of 7000Acres WR REP-117. 7000Acres do not seek to make a case that the UK Grid is not suitable for solar, but that suitable arrangements must be in place to manage the intermittency of such generation, as its proportion of the energy mix grows. The Applicant has missed the point of the illustration in Section 2.1.2 of the WR REP-117, which demonstrates the highly variable "residual generation" that must be scheduled once all intermittent renewable energy is accounted for. The point is that such scheduled generation becomes increasingly difficult as higher proportions of intermittent renewable energy sources are included in the energy mix. The ExA is also referred to the paper by the Applicant's technical author on this subject, "Power System Fundamentals", which explains the circumstances thoroughly. Section 7.6 is titled "Large-scale solar is the most efficient use of land for energy purposes" – and is not	

		supported by the evidence presented by the Applicant. Even within the Applicant's Table 7-1, Onshore Wind has a typically greater yield than solar, by around 30%. Notwithstanding this, the Applicant fails to consider the "usability" of such energy, in that biofuel crops and biogas can be stored and transported, keys which unlock the decarbonisation of sectors such as transport and heating. By contrast, solar produces its volume of power in phase with time of day and time of year, which is frequently out of phase with demand. See Section 2.2 of 7000Acres WR REP-117. The Applicant's analysis explores the National Grid scenarios for further solar deployment. It is notable that, in their calculations, all the capacity deployed is ground mounted solar, therefore none is deployed on rooftops, despite acknowledging the need for a rooftop revolution and nominally supporting the concept of rooftop solar. Curtailment 7000Acres welcome that the Applicant has taken time to address the issue of curtailment more fully than the treatment within the Statement of Need. The Applicant states that much of the curtailment already experienced by National Grid is because of transmission constraints on the UK's wind generation	

		fleet, however the Applicant does not acknowledge that: • Within FES, National Grid introduces the concept of curtailment as being "when supply is significantly higher than demand", as increasing levels of renewable generation are deployed. • Curtailment also already occurs when there is too much "inflexible" renewable generation, and the grid requires a suitable volume of flexible generation to ensure it has the capability to balance variability in supply and demand. This phenomenon increases with greater penetration of renewable energy on the electricity network, and therefore curtailment is foreseen by National Grid to grow massively over the next decade. • This situation underlines the critical priority of deploying resources to resolve grid constraints and to enable delivery of offshore wind to demand centres. Misusing grid infrastructure resources to deliver solar schemes on the transmission network simply makes National Grid's task in this regard more difficult. The Applicant's technical author is quoted stating that "by adding significant capacities of intermittent RES [Renewable Energy Systems] to the ETS [Electricity Transmission System] to assure generation adequacy at times of peak system demand, the risk of creating an	

		over-supply of capacity at times of low demand is increased. This will be particularly true at times of bright sunshine, strong winds, or both". From the Applicant's technical author's paper, "Power System Fundamentals". The key issue being outlined here by 7000Acres is that, without sufficient capacity to store solar energy for the long term (i.e. season to season, rather than for a few hours with BESS) there is an increased likelihood of solar energy being curtailed. The Applicant somehow tries to describe curtailment as being a "good problem for the UK power sector". Let us be perfectly clear: curtailment represents waste. It represents natural and financial resources that have been deployed to create electricity, and it is forecast that a growing portion of that electricity cannot be used. It therefore represents additional cost – which is ultimately borne by the consumer, and by the planet in terms of the natural resources that are consumed. An important detail in this regard, is that the generator is compensated for curtailed energy, therefore, resolving or avoiding this issue is not their concern. The Applicant quotes National Grid FES as showing 31TWh to 46.8TWh of curtailment each year between 2031 and 2040. In this context, it is worth noting that the annual production of the Cottam scheme will be in	

		the order of 0.6-0.9TWh (dependent upon overplanting and tracking panel design). It is quite conceivable, therefore, that the lifetime output of the Cottam solar scheme may not cover a single year's curtailment loss. The Applicant states that through connection to the NETS at a point with sufficient available transmission capacity would indeed mean that a transmission-related curtailment would be unlikely. This potential avenue for avoiding curtailment may be the case, however, the Applicant does not acknowledge that the scheme would still be subject to curtailment through having excess renewable energy for demand. The Applicant also describes that there is a need to build large capacities of renewable energy to withstand periods of low renewable output. Again, this is true only to an extent; this is exactly why there are calls for the development of long-term energy storage and flexible low-carbon dispatchable electricity generation. No amount of renewable generation could avert power cuts or price spikes, as indicated by the Applicant, in the absence of such storage and flexible generation. The Applicant also describes the "use of curtailed energy"; which misunderstands the nature of curtailment. If energy is stored for later use, by definition, it is not curtailed.	

		7000Acres welcomes that the Applicant acknowledges the role electrolysed hydrogen is expected to play in creating inter-seasonal storage but would ask the Applicant where they believe such facilities would be connected to the grid, once high-power connections are unnecessarily sterilised for decades by solar schemes such as Cottam. In terms of the volume of curtailment, and how this may be split between wind and solar. The Applicant rightly highlights the split of curtailment that is stated within the National Grid's FES document, however: • In simple terms, the more the peak total capacity of wind and solar outstrips demand, the more this will lead to curtailment, without the ability to manage (long-term) energy flexibility. • If solar is less likely to be curtailed, supply must still match demand, so what will be curtailed instead? Other renewables? Nuclear? • Intuitively, one might expect there to be significantly more volume of wind curtailment than solar, as the volume of wind generation is so much greater than solar. What is less clear is the algorithm by which National Grid have allocated the curtailment, given that the peak of solar output is predictably out of phase	

		with demand; it is possible therefore, that less solar is being curtailed at the expense of wind. • Even 2.4-2.7 TWh of solar curtailment is some 2-3x the annual output of the Cottam scheme. Therefore, if the Applicant considers 2.4-2.7 TWh per year not to be significant, it undermines the Applicant's assertion that the <1TWh of output from the Cottam scheme can make a significant contribution to energy and decarbonisation. Solar Generation Capability In their response, the Applicant refers to the ES Chapter 7, Climate Change, which states that the estimated energy generated in the first year will be 945,000 MWh (or 0.94 TWh). From this, it is inferred that the installed capacity of the scheme must therefore be overplanted to c. 800MW (and to rely on the deployment of 4.5m tracking panels). The Applicant could be more transparent with the Examining Authority and the public by stating this. It is noted that this installed capacity would be around 16 times the size of a "typical" solar farm, described in the emerging NPS EN-3. It is noted that the Applicant does not challenge the evidence provided in the 7000Acres WR, which describes the significant variability of domestic	

		demand, and the mismatch between solar production and domestic demand, nor has the Applicant challenged the conclusion by 7000Acres that the concept of solar being able to power 180,000 homes as "a meaningless and oversimplified claim, that is being used to mislead the public". Instead, the Applicant states in their response that the figure (945,000MWh) is used to support the calculations of power generated expressed as equivalent annual household consumption. This was not made clear to the public in consultation. The Applicant repeats their assertion that the statement of Need demonstrates the dependability of a combined portfolio of wind and solar assets. The Applicant has not addressed the point made by 7000Acres in Section 7.1 of WR REP-117 that the impression of a combined dependability is misleading, owing to the fundamental requirement to balance supply and demand in the moment, which cannot be done through combining two intermittent generation sources. Rooftop Solar It is noted that the Applicant has made no comment on the evidence provided in the 7000Acres WR, citing reports from the UK Warehouse Association and Ecotricity on the potential capacity for rooftop solar to	

		make an overwhelming contribution to delivering the Government's ambition for 70GW of solar, there being, as a result, no real case for extensive ground mounted deployment. The Applicant states that it considers rooftop as additional to, rather than a substitute for the scheme, and the Applicant also agrees with the need for a "rooftop revolution". 7000Acres are concerned that, despite this apparent position, the continued "headlong rush" for large-scale ground mounted solar by Island Green Power and others will make the need for a rooftop revolution utterly redundant, and vast areas of roof space will remain vacant and unused. The overwhelming volume of the ambition for 70GW of solar would be delivered through ground mounted solar, thereby consuming extensive areas of land and putting further pressure on land use. 7000Acres have highlighted the huge pipeline of potential ground mounted solar developments, of up to 130GW, and Acknowledge the Applicant's comment that not all this capacity will go ahead, nevertheless, without control on ground-mounted solar development, rooftop deployment will be rendered unnecessary, before any stirrings of a "rooftop revolution".	

		The Applicant also makes the rather unusual assertion that, because new houses increase the demand for electricity, any solar on that roof space should not be considered as new capacity. Presumably, in setting out an ambition for 70GW of solar by 2050, the Government will have forecast electricity demand, energy requirements and that will include population and housing forecasts through to that time. It would, therefore, be perverse not to consider solar capacity installed during that period to be "new capacity", just because it happened to have been deployed on households. 7000Acres would observe that, even if 200,000 houses (of the Government's 300,00 target) were built each year, for the last 15 years (i.e. since the Climate Change Act), and would have had 4kW solar panels installed, then the country would already be 12GW further towards its ambition. Connection of Solar to the Electricity System Fundamentally, the Applicant has not challenged the explanation set out in 7000Acres WR, section 4, that solar panels generate electricity at low voltages, and there is no inherent need for solar to be connected using high voltage grid connections. Nor has the Applicant challenged the statement that deployment on rooftops needs no grid-scale infrastructure	

		adjustments, and typically needs little or no adjustments to local distribution networks. This approach therefore takes pressure of National Grid's queue for transmission connections. The Applicant has chosen to deploy low-voltage panels at a high voltage connection, using parcels of land, aggregated over 2km away from the substation and then imply this is part of the critical need for transmission connections, therefore Applicant then citing EN-5 as a case for need is flawed. The Applicant can be shown to be the architects of their own need, having selected a high-voltage grid connection to deploy low voltage panels, seeking a high-power connection which necessitates a significant area of land to occupy the capacity, and then by securing the land in discrete parcels, several miles from the substation site. This is a fundamentally different need from bringing volumes of offshore wind from Scotland to demand centres in the south-east of England, where there is no capacity to deploy this generation at the point of demand, and the transmission distance necessitates high voltages to keep losses to a minimum. The Applicant describes an advantage of connection to the transmission network as being able to efficiently transfer bulk power across the country, however, the Applicant misses the point that a key advantage of (for	

		instance) rooftop solar, is that the panels themselves are distributed to where the power is needed, therefore there is no need to transfer bulk power across the country. As a result, power is used at source, thereby avoiding losses of c. 10% or more, through transmission losses incurred by moving power around the country and transformer losses by stepping low voltage generation to high-voltages and back down again – as explained in the 7000Acres WR, Section 4. It is true, therefore, that rooftop solar does not facilitate bulk transfer of power, but rooftop deployment renders such bulk power transfer unnecessary. The Applicant seeks to justify their massive aggregation of solar panels, by equating this to a "massive and urgent need for solar". 7000Acres observe that: • Despite the apparent "massive and urgent need for solar", domestic and commercial rooftops continue to be built without solar panels, thereby missing the most obvious and quickest route to increasing solar capacity every day. • There is an urgent need – but the urgency is to do what is right, and what will make best use of the country's resources – looking holistically across energy,	

		food and land use, acting with confidence in a way we will not look back on with regret. Battery Energy Storage Systems In terms of prices and spreads, 7000Acres have used spot data from BMreports.com, the website of the market operator Elexon, as referenced in the WR. 7000Acres do not have the resources to subscribe to industry databases, but use the openly accessible information as an example to highlight to the ExA the Applicant's economic motives for the BESS. The Applicant notes the importance of not sterilising grid import or export capacity. 7000Acres agree with this and would ask that the ExA consider the potential for other demands on grid connections at Cottam to be obstructed, or potentially not deployed owing to high voltage, high power grid connections being used unnecessarily for inherently low-voltage solar applications. Such demands may include other priorities in the quest for decarbonisation, such as Small Modular Reactors or Hydrogen electrolysers. Decision on Longfield Solar Farm 7000Acres highlight their concern that the NSIP process can allow the Applicant to provide partial information on technical matters to the Examining Authority, which has the potential to go unchallenged.	

		Even within this submission, 7000Acres have highlighted a number of areas where the material provided by the Applicant has not been balanced or fulsome, and therefore not entirely reliable evidence upon which to base a decision. The Examining Authority is expert in the NSIP process but may not have the technical expertise to scrutinise or test the veracity of specialist material provided by the Applicant. It is not clear to 7000Acres how the process may rigorously test this material, but it would appear to be a weakness in the process to rely on volunteer groups to do so. 7000Acres are not critical of the Secretary of State's decision, which can only be based upon the evidence laid before them but are critical of the potential for the NSIP process, despite all its apparent rigour and formality, to allow partial information from the Applicant to be used as evidence within the decision-making process, as has been highlighted in Section 6 of 7000Acres WR REP-117.	
7A-09		*1.4.7 Please explain why there are conflicting levels of impact of cumulative effects between the Proposed Development and the other nearby NSIPs. For example, please explain why no significant cumulative landscape and visual effects have been identified for the Proposed Development (in contrast to the findings of cumulative*	Whilst the Gate Burton scheme does share some landscape character areas with the Cottam Solar project, the Gate Burton scheme is a singular site located partially within the Laughton Wood Area of Greater Landscape Value (AGLV). The Cottam Solar Project is not located within an AGLV (as set out within

		effects for Gate Burton and Tilbridge as indicated in Table 2.2 of the Report of the Interrelationship between NSIPs [REP-054]. 7000 Acres has serious concerns over the opinions offered by the Applicant's specialists and how they are outliers when compared to those expressed by the Councils' and other developers' specialists. The Applicant has not been consistent in applying a reasonable worse case assessment to their ES Chapters, as required under a Rochdale Envelope. Therefore, their subjective opinions frequently over estimate the benefits of this scheme whilst downplaying any impacts. Unless the Applicant's specialists can provide quantitative evidence to support their claims, 7000 Acres believes that the ExA should prefer the evidence of the Councils' specialists.	section 8.5 of the LVIA Rev A **[REP2-008]**) and is comprised of a series of disparate sites that are separated with tracts of land and with landscape features between that assist with its integration and assimilation into the landscape (see applicants' responses to LCC-03 and WLDC-04 above). There is no direct comparable position with the Gate Burton solar project as this Scheme has a different baseline or starting point. As set out above, Gate Burton occupies (in part) a landscape that affords local designation (AGLV), whereas the landscape at Cottam is not nationally or locally designated. The landscape at Cottam is subject to a notable pressure for change from its predominant use as agriculture and the bench line or starting point for the landscape baseline affected by these sensitivities is associated with this condition and quality. The benefits to landscape character have the scope to restore the landscape baseline. The Environmental impact Assessments for each of the Schemes have been undertaken independently, and different impact assessments can reach different conclusions. The differences between the conclusions of the Cottam Solar Project LVIA and the one undertaken for the Gate Burton Energy Park are not unexpected given the elevated value of the receiving landscape at Gate Burton compared to Cottam, and

			the differences in approach to design and mitigation between the two schemes.
7A-10		*1.5.2 Paragraph 1.1.7 of ES Appendix 8.2.1 (Visual Assessment Methodology) explains that visual amenity from both ground and first floor windows were considered under steps 1-3 of the RVAA but that at step 4, only effects from ground floor windows were considered. Please can the Applicant explain why, under step 4 at Year 15, only effects from ground floor windows were considered.* 7000 Acres does not agree with the Applicant's assessment that only considering views from the ground floor is a "best estimate" of the impact. A Rochdale Envelope (Advice Notice Nine) requires the Applicant to assess a reasonable worse case. A reasonable worse case is assessing the loss of visual amenity from first floor windows, such as from a home office.	The Landscape Institute Guidance Technical Guidance Note 02/19' '*Residential Visual Amenity Assessment*' refers to the ground floor situation at page 16 of the guidance in the context of forming the principle room of the property, but that this may vary according to individual situations. *'The principle room(s) of a residential property is a living room, or one fulfilling the same primary use role. In some properties this room may not be located on the ground floor, but on an upper storey. A conservatory may fulfil a living room/primary use role depending on the circumstances and the internal arrangement of the premises'.* The assessment in this instance has used the 'best estimate' of the likely visual effects on the principle room of each property as being the ground floor given that all the residential properties have not been visited and viewed internally. The ground floor rooms are where exposure is likely to be longer where the consequences of any effects are more likely to be in question. The assessment has been carried out in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, as well as relevant guidance and best practice, and therefore is considered to be robust.

		1.6.5 Paragraph 9.7.113 of ES Chapter 9: Ecology and Biodiversity [APP-044] states that the effects of the installation of solar panels on bat activity and the activity of their prey is largely unknown, in light of this please explain how confident the SoS can be that the purported beneficial effect would occur (paragraph 9.7.126). 7000Acres believes that the Applicant has failed to answer this question. There remains significant doubt over the actual evidence that large solar schemes provide any actual benefits. The 7000 Acres opinion is supported by Natural England (Natural England, 2016) and the Planning Inspectorate (Alder, n.d.) both identify that there is limited evidence to support claims that utility solar increases biodiversity. Natural England state: "Due to the spatial requirements of utility scale solar PV developments, the physical landscape of UK habitats will be affected by the implementation of these technologies necessitating an understanding of the potential effects that solar PV may have on biodiversity. Understanding requires evidence which is traditionally gathered through robust scientific investigation and peer reviewed publication. No experimental studies specifically designed to investigate the in-situ ecological impacts of solar PV developments were found in the peer reviewed literature. Considering that cumulative	The Applicant respectfully disagrees with the Interested Party's contention that the question hasn't been answered. The Applicant is confident that the response to ExQ1 Question 1.6.5 in **The Applicant's Response to ExA First Written Questions [REP2-034]** provides an appropriate evaluation of the confidence that the predicted beneficial residual effect on bats would occur.

		installed global PV capacity is projected to reach between 450 GW and 880 GW by 2030, up from 67 GW in 2011 (Gan and Li, 2015), this lack of ecological evidence is heavily under representative of the interest and investment in solar PV deployment." Furthermore, Adler concludes that: "In the literature, concerns have been raised that solar PV developments have the potential to negatively impact a broad range of taxa including birds, bats, mammals, insects and plants. In light of this, it is highly recommended that research is undertaken into the ecological impacts of solar PV arrays across a broad range of taxa at multiple geographical scales"	
7A-11		*1.6.6 As arable field habitats have been found to contain notable bird species of conservation concern, please explain why arable fields are considered to be of Site Importance only, under paragraph 9.5.32 of ES Chapter 9: Ecology and Biodiversity [APP-044].* 7000 Acres believes that the Applicant has failed to answer this question, especially in relation to protected ground nesting species such as Lapwings.	The Applicant respectfully disagrees with Interested Party's contention that the question hasn't been answered. The Applicant believes that the response to ExQ1 Question 1.6.6 in T**he Applicant's Response to ExA First Written Questions [REP2-034]** sufficiently explains the approach to evaluating the intrinsic botanical importance of a habitat separately from the importance of a site's population or assemblage of a species or species group in accordance with industry standard guidance. The impacts of the Scheme on ground nesting species such as lapwing are considered in **ES Chapter 9 Ecology and Biodiversity [APP-044]**.

7A-12		*1.6.11 What is the Applicant's level of confidence that certain areas of the site may be retained due to their value for wildlife on decommissioning, as is said in paragraph 9.8.3 of ES Chapter 9: Ecology and Biodiversity [APP-044]. Please explain how this will be secured through the DCO.* 7000 Acres is concerned over the Applicant's response to this question: "Following decommissioning, the land will be the responsibility of the landowner. The commitment (as set out in the Outline Decommissioning Statement, paragraph 2.1.5) is to return the land to agricultural use rather than to retain the landscape benefits, however, the Applicant considers it likely that there will be benefits to the landowner of retaining the mitigation and enhancement measures and so they may be left in place." The Applicant has frequently stated that the agricultural land will return to farming production after the life of the scheme ends. The Applicant's response to this question implies that the land may be permanently lost to food production. Therefore, a reasonable worse case assessment is that the land is permanently lost and so food has to be imported in perpetuity to make up for the loss of production.	Agricultural land management decisions are informed by changing market conditions as well as environmental constraints and Agri-Environmental support payments. At present the developing system of Agri-Environmental support for England continues the Common Agricultural Policy shift away from support of production (price support, area and headage payments) to Cross Compliance for the support of environmental goods and services. If a support system, similar to that in development currently, is in place at the time the Scheme is decommissioned, a farm may be offered support payments for the retention of biodiversity and landscape benefits. A farm may also decide to return parts of or all of the biodiversity and landscape enhanced areas to intensive arable use. Decisions on the management of the agricultural land following decommissioning will be a matter for the farm business; this is the same as the current position in respect of the land. Accordingly, the reasonable worst-case assessment is that there will be no loss to the agricultural land resource, either in extent or quality.

7000 Acres - Compulsory Acquisition Hearing [REP3-071]

Reference	Theme	Summary of Issue Raised	Applicant's Response
7A-13		*The submission provides a transcript of an exchange relating to the ownership of plot 10-241.*	Please refer to Section 6.1 of C8.1.24 Written Summary of the Applicant's Oral Submissions & Responses at Compulsory Acquisition Hearing 1 **[REP3-036]**.

7000 Acres - Issues Specific Hearing 2: Agriculture and Soils [REP3-061]

Reference	Theme	Summary of Issue Raised	Applicant's Response
7A-14		*The submission provides a summary and transcript of the part of the hearing relating to Agriculture and Soils.*	Please refer to Section 3B of C8.1.21 Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 2 **[REP3-033]**.

7000 Acres - Issues Specific Hearing 3: Socio-economics [REP3-063]

Reference	Theme	Summary of Issue Raised	Applicant's Response
7A-15		*The submission provides a summary and transcript of the part of the hearing relating to Socio-economics.*	Please refer to Section 3A of C8.1.22 Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 3 **[REP3-034]**. With specific regard to how deprivation in Gainsborough has been accounted for in the assessment, the Applicant refers back to the responses made to 7000 Acres on this matter previously, at responses 7A-030, 7A-037 and more generally in

			Section 2.13 of **C8.1.18 The Applicants Responses to Written Representations Part 2 [REP2-050]**.

7000 Acres - Issues Specific Hearing 3: Battery Energy Storage System (BESS) Safety [REP3-062]

Reference	Theme	Summary of Issue Raised	Applicant's Response
7A-16		Battery Energy Storage System (BESS) Safety Concerns 7000Acres has major concerns over siting a 500MWh (uncapped) BESS in a rural location that is without access to substantial volumes of cooling water. Evidence from previous accidents, including to a BESS in Liverpool, shows that a BESS thermal runaway is a sustained event, usually lasting for many hours, and requires substantial volumes of water to cool the facility. The dDCO Work No 2 B and 3 B show modules closely spaced or joined. The National Fire Chief Council recommends a distance of 6m between battery modules https://nfcc.org.uk/wp-content/uploads/2023/10/Grid-Scale-Battery-Energy-Storage-System-planning-Guidance-for-FRS.pdf : "Access between BESS units and unit spacing In the event of a fire involving a BESS unit, one of the primary tactics employed will be to prevent further unit to unit fire spread. Suitable access for firefighters to operate unimpeded between units will therefore be	The revised Outline Battery Storage Safety Management Plan (OBSSMP) **[REP3-018]** and the Air Quality Impact Assessment of Battery Energy Storage Systems (BESS) Fire **[REP-079]** comprehensively cover the thermal runaway and pollution safety concerns listed in this submission. Where practical, for indicative design purposes a minimum separation distance of 6m between BESS enclosures, as stated in National Fire Chiefs Council (NFCC) guidelines is observed. It should be noted that this guideline was based on FM DS 5-33 (2017) which has been superseded in 2023, and spacing guidelines are now less than 3 metres spacing recommended in the NFPA 855 (2023) guidelines used for the indicative design (submitted before NFCC guidelines were published). NFCC guidelines are assessed and revised on a six-month basis, and there is an expectation that separation distances could be reduced in line with FM DS 5-33 (2023). 6m exceeds the NFPA 855 (2023) guideline distance of 3m, considered safe practice if sufficient UL 9540A testing and/or 3rd Party Fire and

		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." As the Applicant has not provided any evidence, and is applying a Rochdale Envelope to the scheme, a reasonable worse case assessment (Advice Notice Nine) should be applied, and so the spacing distance of 6m must be applied. At time 01:42:24:16 the Applicants battery specialist (Mr Gregory) conceded that he had not been involved in the design of the BESS (shown in Work No 2B and 3B) and that it was an indicative plan. 7000Acres believes the Applicant has not addressed adequately the hazards from the release of poisonous and explosive gasses during a BESS thermal runaway. The Applicant's Environmental Statement Addendum: Air Quality Impact Assessment of Battery Energy Storage System (BESS) Fire Revision A, November 2023, Doc Ref EX2/C8.4.17.2_A paragraph 6.4 applies a	Explosion testing heat flux data has validated that closer spacing does not increase explosion risks or fire propagation risk. The current concept design allows for 3m spacing and the Applicant will provide sufficient UL 9540A testing and/or 3rd Party Fire and Explosion testing heat flux data to LFR as part of the final safety management plan, or otherwise will revert to the 6m spacing (or other specific NFCC spacing guideline) at the detailed design stage. All test data to establish safe spacing will be validated by a BESS specialist independent Fire Protection Engineer and both the detailed design of the BESS and the final battery storage safety management plan must be approved in writing by the relevant planning authority (please see Requirements 5 and 6 in Schedule 2 to the **draft Development Consent Order [EN010132/EX4/WB3.2_F]**). To briefly clarify points on pollution concerns, the UK Health Security Agency was consulted with regard to identifying pollutants that should be included in the AERMOD consequence modelling. In addition to this, confidential small and large scale burn test data for a variety of LFP battery systems was used to model both pollutant emissions and complete burn out times. Burn out times of 2-8 hours for LFP BESS cabinet systems ranging from 750KWh – 1.5 MWh have been consistently demonstrated during recent BESS free

		"worse case" of a BESS fire lasting for 2 hours. The 7000Acres Deadline 1 submission, Battery Energy Storage System Safety Concerns, identified numerous incidents where thermal runaways continued for many hours and sometimes days. A recent example is the 20MWh BESS thermal runaway in Liverpool. The Applicant's "worse case" assessment of 2 hours is not supported by real world evidence. Mr Gregory referenced various testing standards, including UL9540A. In the 7000Acres deadline 1 submission, page 6, we discuss testing standards. The report into the Victoria Big battery thermal runaway in 2021 identified that the UL9540A test standard was insufficient for real-world cases: "An investigation conducted by Fisher Engineering, Inc. confirmed that untested wind speeds were a key contributing factor, reaching up to 36 miles per hour during the event compared to a maximum of 12 miles per hour under the UL 9540A testing environment. In an interview, ESV characterized this situation as a "near miss" when considering an event like this in the context of other times of the year with higher temperatures and stronger winds."	burn testing and thermal runaway incidents in the field. The report also includes a sensitivity study of the impact of a 38-mph wind speed which is the highest recorded in the local area in the 5 years of wind data analysed for the report. At the detailed design stage, the Applicant will commission site and BESS system specific consequence modelling to ensure that the BESS system selected will not emit toxic emissions that exceed the levels stated in the Air Quality Impact Assessment for the closest receptors and remain below Public Health England (PHE) guidelines, as referenced in the OBSSMP. A December 2023 interim report in New York State on three BESS fires involving both LFP and NMC battery systems has concluded that: "Based on available analyses of air quality, soil, or water data collected in the days following the incidents, the Working Group concluded that there were no reported injuries and no harmful levels of toxins detected." The data assembled and analysed by the Working Group includes: • An air monitoring report from the Office of Fire Prevention and Control (OFPC), and soil and water sampling data received from the Department of Environmental Conservation (DEC) from the Chaumont site.

			• On-site air monitoring results collected from the Warwick sites and relayed to the Working Group by local officials. • On-site soil sampling results from the East Hampton site relayed to the Working Group by a project developer. • An independent third-party site inspection report consisting of air monitoring and surface sampling at school buildings in the vicinity of the June 27, 2023, fire at the Warwick site. Based on the information available to date, there is no evidence of significant off-site migration of contaminants associated with the fires. [redacted] In order to determine the volume storage of external water supplies for firefighting, NFCC guidance has been used at the indicative design stage which states provisional firefighting supplies "should be capable of delivering no less than 1,900 litres per minute for at least 2 hours." Lincolnshire Fire & Rescue Service (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. A BESS design which may require direct LFR firefighting engagement tactics will not be selected for this facility.

			The actual site supply requirement will be decided at the detailed design stage. On top of this supply requirement of 20% to 30% additional capacity will be allowed for storage in the water run-off retention facility (current legislation requires only 10%). The proposed additional capacity allows for the need to accommodate potential increases to rainfall volume from climate change, and reduces BESS fire water run-off pollution concerns from a fire. At the detailed design stage, as specified in the OBSSMP (5.4.4) a fire water management plan will be produced to include the containment, monitoring, and disposal of contaminated fire water. Infrastructure shall be provided for the containment and management of contaminated fire water runoff from the BESS. This can include bunding, sumps, and purpose-built impervious retention facilities. All process water used in the system shall be prevented from contaminating potable water sources in accordance with local regulations through the use of check valves or other means as part of the system design. As specified in the OBSSMP Site and BESS design principles and Emergency Response Plan (ERP) content will ensure that Lincolnshire Fire & Rescue Service (LFR) are expected to need to employ a defensive strategy in the event of any fire i.e., employing

			boundary cooling for cooling of adjacent BESS or associated supporting equipment.
7A-17		The current BESS design does not appear to contain sufficient bunding and storage capacity for large volumes of polluted fire water. This requirement should be secured in the dDCO.	The specific firefighting water runoff drainage and water capture design and locations will be finalised at the detailed design stage when the volume of water required is agreed with LFR. The design will allow for easy pollution analysis and the firefighting water can be tankered off site if polluted. The proposed BESS will be required to attenuate surface water up to and including the 1 in 100 year (1% AEP) event, plus a 20% additional volume to account for climate change, whilst discharging at the current 1 in 2 year event greenfield rate as described in section 3.0 'Substation and Battery Storage Drainage Strategy' within **C6.3.10.4 ES Appendix 10.1 Annex D 10.1.3 Cottam 1 West [APP-093].** It is proposed to utilise the same attenuation capacity of the site to attenuate firewater generated by the development in the unlikely event of a fire. As stated in paragraph 3.11.4 of the above report '*The system will be designed to accommodate the 1 in 100 plus 20% climate change storm event, therefore a sufficient amount of storage is provided to contain a reasonable worst case 1 in 10 year storm event plus the provided firewater requested by the Lincolnshire Fire and Rescue Service*'. Both the detailed design of the BESS (which will include bunding and storage capacity) and the final battery storage safety management plan must be approved in

			writing by the relevant planning authority, after consulting with relevant stakeholders including, in relation to the battery storage safety management plan, the relevant fire and rescue services. Please see Requirements 5 and 6 in Schedule 2 to the **draft Development Consent Order [EN010132/EX4/WB3.2_F]**. These Requirements will only be discharged once the relevant planning authority and relevant stakeholders are satisfied that the detailed design of the BESS and the management plan are fit for purpose.
7A-18		7000Acres retains its serious concerns over BESS safety. The Applicant has relied on future improvements in technology to mitigate safety but not provided any evidence. Therefore, in accordance with a Rochdale Envelope (Advice Notice Nine) the design should be based on a reasonable worse case, which is currently available technology. Furthermore, the Applicant has not considered adequately the impact of poisonous and explosive gasses on nearby residents.	The Outline Battery Storage Safety Plan **[REP3-018]** and the Air Quality Impact Assessment of Battery Energy Storage Systems (BESS) Fire report **[REP-079]** comprehensively cover fire and pollution safety issues. These documents incorporate requests from the UK Health and Security Agency and from Lincolnshire Fire and Rescue.

7000 Acres - Issues Specific Hearing 4: Climate Change [REP3-065]

Reference	Theme	Summary of Issue Raised	Applicant's Response
7A-19		Within 4 "Main Discussion Points", 7000Acres response	1. The annual output of 945,000 MWh is derived from the production generated by the indicative installed capacity, distributed across all Cottam sites. Whilst the

		"Climate change – the Applicant will be asked to explain how it has reached the conclusion for a major beneficial cumulative effect." 1 Basis of output: First of all, it is not clear upon what basis the Applicant has calculated annual output in year 1 to be 945,000 MWh. At a roughly 11% load factor for solar in the UK, this would imply an installed capacity – without any constraint on the export grid capacity, of around 980MW. Clearly, the publicity material for Cottam is for a 600MW scheme, and based upon that figure, the likely year 1 generation would be 580,000MWh. On this basis, the Applicant has used an output figure that is significantly higher than the capacity indicated in their consultation material. The baseline capacity the Applicant is using for their calculations is therefore not clear. This may relate to the extent the scheme is being "overplanted", as has been previously discussed by the developer at other hearings for their West Burton scheme, where they are exploring the economics of "overplanting" by 30% to 50%, i.e. laying down more	Scheme has a grid connection capacity of 600 MW, the Scheme will be overplanted, with an approximate 1.3 DC-AC ratio. This ensures that during off-peak sunlight hours, there will still be ample generation to supply the grid and fully utilize the 600 MW connection capacity. In peak sunlight hours, typically between midday and early afternoon and summer days, the solar panels will generate excess electricity, surpassing the 600 MW threshold. However, this surplus energy will not go to waste, as it will be efficiently stored in batteries. The integration of a battery system is essential to ensuring optimal utilization of the electricity generated by the panels. 2. Each scheme has concluded significant beneficial cumulative impacts for the respective scheme in isolation. For Cottam/West Burton, a cumulative beneficial cumulative effect has been identified as four solar projects being developed at the same time would result in a quicker reduction in CO_2e emissions from legacy sources than a single project alone. This approach takes into account professional judgment and interpretation of the IEMA Guidance. A more conservative approach has been taken by Gate Burton and Tillbridge and no additional cumulative beneficial effects have been identified as a result of their interpretation of the Guidance. That interpretation considers that 'cumulative effects' are

		panels, with a lower utilisation rate, to make greater use of the grid connection. And because the capacity is not clear, the number of panels in the baseline assessment cannot easily be understood. 2 Comparison Methodology: In terms of the methodology behind claiming a "major beneficial cumulative effect": • The Applicant's methodology is based upon this project compared with no equivalent solar capacity going ahead, and the entire output being replaced by generation with the average grid intensity of CO2. • In reality, if this project does not go ahead, and other solar schemes do go ahead, there will only be a negligible difference in CO2 emissions. For instance, if the same capacity were deployed through domestic rooftops, the CO2 difference would be marginal, based upon the trade-off between: o The advantage arising from the economies of scale, deploying large scale solar o The disadvantage of having not deployed on rooftops, at low voltages, which therefore removes the capital cost and carbon investment in high voltage transformers and transmission lines – and which would	not possible to assess for climate change given the global, rather than local, scale of the impact. In light of this difference in interpretation, the SoS may decide to place limited weight on the beneficial cumulative effects identified by the Applicant (albeit, each Scheme has identified beneficial effects for each Scheme, assessed individually). Discussion between the different authors of the Climate Change Assessments for the projects has taken place to under that the approach taken in each environmental statement. The Scheme has an anticipated grid connection date of 2029 as set out in **ES Chapter 4: Scheme Description [REP-012]** so whilst other schemes may or may not come forward it won't be in the same timeframe. Therefore, the benefits won't be realised for significant periods, and rely on those projects coming forward which is inherently uncertain.

		also eliminate transmission losses, as the bulk of rooftop solar power would be consumed at the point of generation. • On that basis: o The lifetime emissions reduction of 5.9m t CO2 would be decimated. o The "payback" period to offset the development emissions will be significantly longer, if at all. 3 Not All Energy is Equal: In addition, within the assessment, the Applicant has considered "all energy to be equal". The key difference between solar energy and "grid supplied" energy, or higher CO2 fossil sourced energy that is "dispatchable", is that such power is available upon demand, therefore, while energy may be equivalent in volume, it is not equivalent in value. For instance: • Grid energy can replace 1 kWh of solar energy at any time. • Solar energy can only replace 1kWh of grid energy when there is sufficient sunlight. In this way, the calculation by the Applicant is oversimplified. At present, the higher carbon sources of electricity are used when wind and solar are at their lowest,	

		therefore, using an average grid CO2 intensity doesn't reflect that these higher-carbon, dispatchable sources of generation are more likely to be deployed when wind or solar are not available. The solar scheme will therefore act to reduce CO2 intensity of the grid by adding to the quantity of solar already available, at times when there is already a relatively low CO2 intensity. During the winter at points of peak demand, the electricity market prices spike, despite its low CO2 intensity, solar cannot contribute energy to displace other forms that are available. It is at these peak times when higher CO2 fossil fuels are more likely to be used, and the scheme be able to make only a minimal impact in reducing the carbon intensity of the grid at these times, if at all. 4 No Curtailment Modelled: Furthermore, the assessment assumes all the output will be used, and that the scheme is never "curtailed". Curtailment occurs already when there is an excess of renewable generation than the demand required. This additional energy is switched off and not used. It can therefore not displace any other form of generation. The Applicant has not estimated the volume of	

		curtailment the scheme will face, but this will serve to reduce the lifetimes emissions reduction claimed. As an indication of the scale of this issue, National Grid foresee that the amount of curtailment will reach between 30 and 60 TWh by 2035, in comparison to the annual output of the Cottam scheme, estimated by the Applicant to be almost 1 TWh. Solar is particularly susceptible to periods of curtailment, as it generates a predictable peak of generation that is typically out of phase with the demand curve of the grid. It is therefore potentially material to the output of the scheme that the extent to which the scheme may be curtailed is factored into the lifetime output of the scheme, and therefore the rate at which it can be seen to offset development emissions. 5 Significance: The contribution to energy and therefore decarbonisation will be limited. Taking the 600MW used in consultation, the annual output will be 0.58 TWh. • This represents 0.2% of current annual electricity demand of 300TWh.	

		• As demand is forecast to rise to between 800 and 900TWh by 2050, the contribution from this scheme would fall to around 0.07% of national electricity supply. Even using the Applicant's higher figure of 0.945TWh per year, is would only supply 0.1% of national demand. The project will not make a material contribution to energy or decarbonisation – for all its adverse impacts. In Conclusion: • Overall, there is a question about the output assumed by the Applicant in their calculations. • The methodology used by the Applicant has been designed to creates an impression of significant CO2 emissions reductions and underpin a claim to have a "major beneficial impact". • In reality, a number of assumptions have been used to help create this impression, and therefore little weight should be given to the evidence provided by the Applicant without independent verification.	

7000 Acres – Issue Specific Hearing 4: Cumulative Effects [REP3-066]

Reference	Theme	Summary of Issue Raised	Applicant's Response

7A-20		*The submission provides a summary of the hearing relating to cumulative impacts.*	Please refer to Section 3 of C8.1.23 Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 4 **[REP3-035]**.

7000 Acres – Issue Specific Hearing 5 [REP3-069]

Reference	Theme	Summary of Issue Raised	Applicant's Response
7A-21		2. Review of Significant Effects at 60 Years After the public consultation was completed, the Applicant chose to increase the operating period for the scheme by 50%, from 40 years to 60 years. 7000 Acres notes that the updated EN-3.10.140 states that "an upper limit of 40 years is typical". The original Environmental Statement submitted and assessed by Interested Parties was based on a 40 year time span. The Applicant submitted in November 2023 a document titled: Review of Likely Significant Effects at 60 Years: Environmental Statement Review Prepared by: Lanpro Services Document reference: EX2/C8.2.7 . This later document summarises any implications on extending the life of the scheme by 50%. 7000Acres agreed with WLDC that increasing the life of the scheme would compound many of the adverse effects already identified by Interested Parties. Chapters where errors and concerns have already been	Please refer to Section 4 of C8.1.26 Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 5 **[REP3-038]** and the response to WLDC-12, above.

		identified include: Chapter 7, climate change; Chapter 8, LVIA; Chapter 9, ecology and biodiversity; Chapter 10, flood risk; Chapter13, cultural heritage; Chapter 15, noise; Chapter 16, glint and glare; Chapter 18, socio economics tourism and recreation; Chapter 19, soils. Insufficient information has been provided in the Review of Likely Significant Effects at 60 Years: Environmental Statement Review to explain why it should override the conclusion made in the original ES chapters. Once again, the Applicant seems to have relied on Professional Judgement rather than presenting quantitative information.	
7A-22		2.1 Example – Chapter 7 As an example, 7000Acres has concerns over the original Chapter 7 because many of the assumptions applied were "optimistic" and were not a reasonable worse case, as required under a Rochdale Envelope (Advice Notice Nine). For example, the Applicant assumes that 50% of the infrastructure will be sourced in Europe and 50% in China, whilst the main provider of industrial solar panels and batteries is currently China, so their 50:50 assumption is wrong. The Likely Significant Effects at 60 Years: Environmental Statement Review, page 6 states that over the 60 year life of the scheme 24% of the panels would require replacement, so 76% of the panels will last for 60 years.	Please refer to the Applicant's response to 7A-04, above. The calculations referred to have been based on an assumed replacement rate of 0.4% of panels per year. This is the rate at which panels would be replaced should they cease to operate entirely. Separately, panel performance across the Scheme would gradually degrade over a number of years, but this has been accounted for within the models of the Scheme's viability and production estimates and this would not be a reason in itself for large-scale panel replacement within the lifetime of the Scheme. The likely suppliers of the batteries to be used for the development were consulted and advised that the

		There is no evidence that solar panels will last for 60 years, so the Applicant has not based their assessment on a reasonable worse case assumption. In Chapter 7.2.7 the Applicant originally assumed the batteries will be replaced once over the 40 year life of the scheme. The Likely Significant Effects Document claims that the batteries will not need replacing during the additional 20 year life of the scheme. That means the life of the batteries will need to be at least 30 years. Current evidence is that BESS battery life is based on the number of recharging cycles, not time. A BESS engaged in energy arbitrage, which is the primary purpose of the Cottam BESS, will require a large number of recharging cycle; current evidence shows the life of a BESS battery is approximately 10 years1 , although frequently less. In summary, the Applicant has seriously underestimated the greenhouse gas emissions for this scheme both during the build phase and during the maintenance of its operation. This is merely one example of how the Applicant has not made a reasonable worse case assessment of the implications of extending the life of the scheme from 40 years to 60 years. 7000Acres believes that either Chapter 7 should be updated to make a reasonable worse case calculation	lifespan of the batteries would be approximately 20 years. It is accepted that some assumptions have been made for the purpose of calculating the greenhouse gas emissions due to the early stage of development and that full details and quantities of materials and products to be used are not yet known. However, the assumptions made are considered to represent the reasonable worst-case scenario and the overall conclusion shows that, even with any amendments to the total embodied CO_2e of construction of the scheme, this would be offset by the renewable energy generation.

		of the greenhouse gasses generated during the life of the scheme, or the life of the scheme should be limited to the life of a single set of solar panels. A similar process should be applied to the other ES chapters.	
7A-23		3. Applicant's Use of a Rochdale Envelope 7000Acres accepts that a Rochdale Envelope is required for schemes such as the Cottam NSIP. However, an Applicant using a Rochdale Envelope has a number of requirements placed on them. In particular, Advice Notice Nine paragraph 1.4 requires a consistency across the application documents. The Applicant's documentation is not consistent between the dDCO and the ES, for example the LVIA assumes a limited number of hedges will be removed whilst the dDCO permits all the hedges in the scheme to be removed. The Battery Storage Safety Management Plan is now different to the outline design shown in the dDCO. The glint and glare assessment makes use of "opaque fencing" as a mitigation, this is not discussed anywhere else in the ES. When a reader looks at different chapters of the ES, or the dDCO, they will get different versions of the Applicant's assessment, this is unacceptable. The NSIP process should be "front loaded" with the Applicant coming to Examination with a clear and coherent plan. This is not	The Applicant disagrees that the documentation is not consistent in respect of the Rochdale Envelope. The Application documents, including updates submitted throughout the Examination, must be read by reference to each other. By way of example, the **draft Development Consent Order [EN010132/EX4/WB3.2_F]** provides, at article 38, the power for the removal of hedgerows. This power applies to all identified hedgerows. The exercise of the power is then limited by the **outline Landscape and Ecological Management Plan [REP3-016]** (itself secured by Requirement 7 of Schedule 2 to the **draft Development Consent Order [EN010132/EX4/WB3.2_F]**) to temporary removal of between 3 and 7.1 metres of hedgerow, and the permanent removal of between 3 and 6.5 metres (paragraphs 1.2.3 and 1.2.4). The Environmental Statement (ES) has considered a reasonable worst-case scenario that includes the removal of hedgerows on this scale in the relevant ES Chapters. The use of opaque fencing to mitigate glint and glare impacts is secured in Table 3.5 of the outline Operational Environmental Management Plan [REP3-022], which is secured by Requirement 14 of Schedule

		the case for the Cottam NSIP Application, the Applicant has not presented a clear and consistent case.	2 to the **draft Development Consent Order [EN010132/EX4/WB3.2_F]**.

7000 Acres – Open Floor Hearing 2 [REP3-070]

Reference	Theme	Summary of Issue Raised	Applicant's Response
7A-24		*Section 1 of the submission provides the text of a statement made at Open Floor Hearing 2.*	Please refer to Section 3.6 of C8.1.25 Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2 **[REP3-037]**.
7A-25		2 Answer to Question from ExA regarding the call for Issue Specific Hearings Within ISH4, 7000Acres noted that examinations of other NSIP-solar schemes in the region had held Issue Specific Hearings on the subject of energy and were concerned that the absence of an equivalent hearing in the examination of the Cottam scheme could be a weakness in the examination. The ExA replied that the examination is primarily a written process, and that they believed there was sufficient opportunity for written questions and answers to make a thorough and fair determination. Following a related comment by 7000Acres on this topic at OFH2, the ExA asked the 7000Acres	The Applicant notes these comments and refers the party to the Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2 **[REP3-037]**.

		representative directly why they felt there was an explicit need for an ISH on energy or health. This submission provides a more detailed response to the ExA's question: • 7000Acres understands that the examination is primarily a written process, however, the resources available to the Applicant creates a landscape that is weighted massively in favour of the Applicant – in the volume of material, if not in the quality of arguments themselves. • For such a body of material provided by the Applicant, the process provides independent consideration of the arguments, but does not provide independent expert scrutiny of assertions made by the Applicant's technical experts. • 7000Acres are concerned that, in key areas, the material provided by the Applicant is heavily biassed, partial, or misleading – and the volume of material produced by the Applicant for the examination process is significantly beyond the resources of a volunteer campaign group to scrutinise or challenge – and in the absence of such challenge, there appear to be no other resources to hold the Applicant to account for their material.	

		• Many of the other parties within the examination process, e.g. Councils and to some extent, also the ExA, are primarily concerned with the legality and compliance with the planning processes, rather than the voracity of underlying evidence or assertions made by the Applicant, which therefore can appear to go unchallenged. • For example, within the Longfield Solar decision, there appeared to be a number of conclusions drawn which related to the contribution of the scheme, in particular its contribution towards a decarbonised energy system and a secure, flexible energy supply, and also to the potential for rooftop solar to provide an alternative solution to the policy objective. In both cases, it was clear what the Applicant had set out in their material, but what was not clear was the extent to which these assertions had been challenged. • 7000Acres believe there are key flaws in the logic and case of deploying ground-mounted solar at such a scale in the UK, and that a sufficiently holistic view has not been taken in terms of its role in decarbonisation and sustainability. Similarly, for such an important topic as health, the potential overall impacts of development at such a scale on the community, does not appear to have been sufficiently considered.	

		• An Issue Specific Hearing provides an additional opportunity for these issues to be explored by the ExA in more detail. In addition, although the format of the hearing usually provides the Applicant the right of final comment, the dialogue is controlled by the ExA, in a way that provides a greater degree of direction and balance than in the solely written process. • An ISH also provides the ExA the opportunity to question the Applicant and other parties directly on the topic, which provides an immediacy and often a context that cannot be directly replicated in a series of written responses. • For energy in particular, the subject is fundamental to the core purpose of the scheme. It is therefore essential that the assertions made by the Applicant are thoroughly tested. • 7000Acres recognise the importance of decarbonisation, but the issue is too important to leave the Applicant to be trusted to produce their own body of evidence.	
7A-26		3 Response to the Applicant's oral submission made at the end of OFH2 7000 Acres wishes to clarify to the Examining Authority statements made by the Applicant at the Open Floor Hearing 2, 7th December 2023.	The Applicant notes these comments and refers the party to the Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2 **[REP3-037]**.

		Mr Phillips is a partner and lawyer for Pinsent Masons LLP. In his open floor closing statement Mr Phillips claimed that climate change 'as a matter of fact, is occurring all around us'. As Mr Phillips is representing the Applicant to the Examining Authority (ExA), he should not be making comments to the ExA outside his professional realm. We argue that Climatology is outside Mr Phillips expertise and as such, we ask that the ExA gives no weight to this comment. Mr Phillips stated that solar makes a meaningful impact on decarbonisation and that it is a good use of the available National Grid connections at the Cottam and West Burton sites. Again, we are not aware that Mr. Phillips is an Energy expert. The 7000 Acres group are fortunate to have members in the group that are and therefore with this knowledge base, we are clear that decarbonisation is a complex area and simple, headline statements being made by the Applicant are not adequate in terms of providing sound and reliable evidence to the ExA to enable formulation of a robust and evidenced recommendation to the Secretary of State. This illustration highlights one of the reasons why we have asked for an Issue Specific Hearing on this fundamental matter in relation to the proposals being put before this Examining Authority.	

		Mr Phillips also stated that one fifth of available agricultural land in the Country will be used for ground mounted solar schemes. This is an alarming and shocking figure to quote and as such represents the solar industry's business aims. Therefore, the ExA needs to be aware that the Cottam scheme (along with the other proposed solar NSIP's) symbolises the start of the erosion of the Country's ability to feed itselfi, with untold damage to wildlife, the environment and our societal norms, communities and health and well-being, across the whole Country. He added that we (the residents) make the 'assumption' that all agricultural land will be used for agricultural purposes. For the record, we not do assume this. We argue that arable land should not be industrialised by groundmounted solar on such vast scales as proposed by the Applicant and the other NSIP schemes. Lastly, Mr Phillips stated that Lincolnshire is known as a region which is a 'power base' and that there is a 'significant history of power production' in the County and therefore, such proposed schemes are in-keeping with historic past of the County. This is incorrect. Lincolnshire is an agricultural area. Nottinghamshire is the location of both the Cottam and West Burton power stations, amongst others and not Lincolnshire.	

Alasdair Broadbent [REP3-073, REP3-074]

Reference	Theme	Summary of Issue Raised	Applicant's Response
AB-01		**Verbal representation made by Alasdair Broadbent at Cotam Open Floor Hearing 2, 07/12/2023** For any project to be viable the benefits have to clearly outweigh the costs. To make that conclusion one must be in possession of all the key facts. But for this scheme that is very difficult because all of the benefits presented are theoretical and changeable to be decided at a later date, whereas the cost are all too real. It's very difficult to have any faith in the developers plans when even the key benefit, the energy generation of the scheme, is a wildly inflated estimate being based on the technical capability of the panels, not their realistic expected output. That system is fine for conventional power stations that can run at their capability, but when used by solar is misleading. According to a report from the department of Business, Energy and Industrial Strategy the load factor current being achieved by solar facilities in the UK, is only 10.2% [Department for Business, Energy and Industrial Strategy,2021]. Therefore, the actual capability of this 600MW plant is more likely to be 61MW. But this is by no means a guaranteed value as the applicant has so	The Applicant notes these comments, and refers the party to the Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2 **[REP3-037]** and the Applicant's response to REP-117, set out in [**REP2-034**]. The email that was included with this response from the Tillbridge team states that the Tillbridge project would provide 1,065,600MWh per year to the National Grid. The equivalent estimate for this Scheme, as discussed in the response to 7A-19 above, is that the Scheme would produce 945,000MWh per year. The two sites are therefore of a similar order of generation, with the Scheme's estimate being slightly more conservative.

		many caveats such as not specifying the panels type (fixed or tracking) or even the panel technology they will use. To make matters worse that generation is an average with the load factor being heavily weighted to summer months where it gets up to 15%, this reduces to less than 6% in winter months when the capacity is actually needed. Compounding things even further is the fact that the power generated is all during the day when demand is low; and there is no energy produced when it is actually needed. This is a limitation understood by the developer. With battery storage of unspecified capacities being hailed as a solution to bridge the gap. Unfortunately, storing meaningful capacity in batteries isn't really feasible and certainly not achievable on a national scale. The way other stations improve this issue it to have pumped hydroelectric energy storage, which would be better idea than batteries other than that it would require hilly land something Lincolnshire isn't known for so potentially there are better locations for this sort of facility. Without the developer being able to guarantee a minimum generation, I don't see how a fair decision can be made on this application.	

		Another area I would like to highlight is there is much conflicting information provided to the public and there are several schemes in this areas, making understanding and keeping track of them though the application process impossible for most people. A sceptical person would wonder if that was an intentional ploy. This issue is highlighted by the difference in generation figures given by what should be very similar projects. Based on information given to me by Tillbridge (see attached email), they would put solar panels on 900 hectors and produce 122MW/hr (12.4MW/hr using a utilisation factor of 10.2%), but Cotam using 1150 hectors will get 600MW (61MW). So supposably, Cotam will be achieving nearly four times the amount per hector than Tillbridge predict. So, either Cotam have a must better solution, which they should be sharing with Tillbridge, or Cotom is extremely optimistic. And it would be awful if this application was approved based on a belief it could generate a lot more than it will in reality. Using Tillbridge's numbers: Cotam would only produce 16MW, which is less than an energy from waste plant which would require 10 hectors of land. One of the main arguments for this and similar projects is, grid security. Which considering the likely	

		generation, it won't have any significant effect on. But it most definitely will be at the expense of food security. In 2020, the UK imported 46% of the food it consumed [Department for Environment Food & Rural Affairs, 2021], so removing farmland from production will mean we are more dependent on imports. In a situation a where international relations deteriorate or there are shortages, I know I would much rather have to limit my energy usage than ration food. The food that would have been grown on the land will still be required, which would need importing. Assuming wheat was grown on the same amount of land and using 8t/ha as the average wheat yield [Lincolnshire Pride, 2023], importing that wheat would produce carbon release from the burning of fossil fuels, assuming it was imported from Cannada and transported by a bulk carrier emitted 3.54 grams of CO_2e per metric ton of goods shipped per kilometre [Tiseo, 2023]. The distance between United Kingdom and Canada by cargo ship is 2,502 Nautical Miles (4,634 Kilometres / 2,880 Miles). This distance is measured by sea between Liverpool and Halifax. [Fluent Cargo, 2023] Therefore, the carbon impact would be: =8 x1400=112,000t x 3.4x 4634=1,764,627g/ 1,765 t of carbon per year.	

		There are many other less easily measured consequences. For example, a secondary product from grain production is straw, which has many uses such as bedding for livestock. So, with the tens of thousands of acres planned for solar, it could result in shortages or additional imports. Conclusion Solar panels are a good technology when installed in the right circumstances. In the USA there are areas that achieve a load factor of 29% [U.S. Energy Information Administration. (2019)] on land akin to desert which maybe a fair exchange. But unlike that situation we are talking about using valuable farmland to get a third of the benefit which I think is ludicrous. We should only be considering technologies that that the minimum possible impact and that work alongside our way of life. An example of this is wind turbines which although divisive, they take a fraction of the footprint of solar and allow the land round them to still be farmed. Humans have been damaging our planet for centuries a fact we are now aware of, therefore it is our duty make sure we don't inadvertently cause more damage while trying to reduce our impact. The wrong action is	

		worse than doing nothing. Which is that I believe this is… the wrong action.	

The Bingham family [REP3-075]

Reference	Theme	Summary of Issue Raised	Applicant's Response
BF-01		I would firstly like to comment on the statement from Mr Gareth Phillips, the solicitor representing the Applicant. He is wrong to say that Lincolnshire is historically a power producing county; that is Nottinghamshire the other side of the River Trent from us. The power cabling will have to go under the River Trent to connect to the old power stations. Mr Phillips thinks our communities should make the sacrifices of losing our peaceful, rural lives for 'the greater good'. I would question who 'the greater good' is benefiting. I think it is for the huge profits linked to these projects. He states that Defra is not worried about food security and that golf courses account for the same amount of land as that being requisitioned for Solar. Golf courses are at least green areas where wildlife can live in harmony with that use. A harvest is never a certainty	The Applicant notes these comments. Please refer to the response given for comment ALT-01 of **C8.1.19 The Applicant's Responses to Written Representations Part 3 [REP2-051]** regarding alternative sites for solar development. The Defra Food Security report[3] is clear that key risks to UK food security include climate change and soil degradation. Land use change is not included within this list of key risks. In respect of the comment about a construction access route near Willingham by Stow, the routes HGVs will take to the Site are set out in Section 6 of the **6.3.14.1 Transport Assessment [EN010132/EX4/WB6.3.14.1_B].** No HGVs associated with the solar array element of the Scheme are expected to travel through Willingham by Stow. There will be a small number of vehicles associated with

[3] United Kingdom Food Security Report 2021. Defra December 2021 https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021

		especially given the variability in weather patterns we are now seeing. To say we are all in hoc to China already is quite frankly, condescending and patronising. If you're in a hole you stop digging. We should be stepping back from China in every aspect. In any event, this is disingenuous as we know this country uses coal power extensively, the shipping round the world of all the components and the heavy plant needed in construction renders these projects totally 'un green'. My statement: I'm representing a fourth generation family farm, farming grade 3 land. As farmers we are expected by the Government to take care of the environment, look after hedgerows, plant trees and to produce food. And yet those principles can be totally disregarded by these solar schemes for the mass industrialisation of our countryside. This is not green energy; this is profiteering off the backs of rural communities and the environment. There is almost a sinister aspect to this attack on the bread basket of the country especially given the number of other solar industry applications in Lincolnshire. Obviously higher powers are making encouraging noises for these schemes otherwise the	construction of the cable route corridor that may have to travel through Willingham by Stow. Details are set out in Section 5 of the **6.3.14.1 Transport Assessment [EN010132/EX4/WB6.3.14.1_B].** All HGV movements will be managed through the **6.3.14.2_B Environmental Statement – Appendix 14.2 Construction Traffic Management Plan [EN010132/EX4/WB6.3.14.2_E]** to minimise impacts on the local communities.

		Applicants would not be spending millions to further their plans. But there is no joined up energy plan. Land is a finite resource and the demands on it are being felt like never before. Food production has to be high on the list in these uncertain times. Everyone wants access and right to roam and wildlife and the environment is suffering. Solar has its uses and limitations. It belongs on brownfield sites, roof tops, warehouses and new builds not on agricultural land and in rural areas. The HS2 fiasco and abandonment of the northern line is an example of what to expect on these NSIPs. Lives and livelihoods have been ruined with land being compulsory purchased and there is no accountability or recompense. Be warned landowners who think this is an easy cash cow although I quite understand it is tempting many to give up farming in these testing times. If these schemes are sold on to foreign investors will any of the safeguards be adhered to and who will police a potential lifespan of 40 to 60 years? This whole area will be ruined for generations and may never be restored to farmland. I have no trust in the system at all.	

		There are plans for my village of Willingham by Stow to have an access route for heavy construction plant to come through along a quiet residential lane which is used regularly by dog walkers, horse riders and children. It would involve some land being compulsory purchased and other quiet country lanes being made wholly unsafe for locals to use.	
BF-02		A battery storage and sub station is proposed quite close to the village which is a huge worry regarding fire risk and pollution. I was involved with a harvest field fire last year which was frightening. Local farmers, along with two fire engines, came together to stop the rapidly spreading fire. I doubt they could do that with a solar fire.	The Outline Battery Storage Safety Plan **[REP3-018]** and the Air Quality Impact Assessment of Battery Energy Storage Systems (BESS) Fire **[REP-079]** comprehensively cover fire and pollution safety issues. Both the detailed design of the BESS and the final battery storage safety management plan must be approved in writing by the relevant planning authority, after consulting with relevant stakeholders including, in relation to the battery storage safety management plan, the relevant fire and rescue services. Please see Requirements 5 and 6 in Schedule 2 to the **draft Development Consent Order [EN010132/EX4/WB3.2_F]**. These Requirements will only be discharged once the planning authority and relevant stakeholders are satisfied that the detailed design of the BESS and the management plan are fit for purpose
BF-03		These solar panels will, no doubt, be mainly sourced from China and there is plenty to worry about with	Please refer to the response given for comment GEN-08 of **C8.1.19 The Applicant's Responses to Written Representations Part 3 [REP2-051]** regarding

		that. We should be distancing ourselves from this country as much as possible. I understand there will be 5 to 7 years of construction across the four schemes so years of disruption and danger to come. And then what? We need a coherent energy plan which properly considers what finite resources we have. If we don't do that in the next decade then we are jiggered. But these solar industrial estates have a lifespan of 40 to 60 years so will they be obsolete before they are even finished? I don't trust the data the Applicants have produced because it has been manipulated to hide true facts and make it more palatable. Photos taken for their reports have hidden vistas and important areas. Their names, 'low carbon' and green power' are worded to seem less threatening but the fact is this is sheer, greedy profiteering. My grateful thanks are to the 7000 acres group without whom I would not have made any sense of this process but so many of our community have failed to engage with the process because it is complicated, they have already busy lives and the amount is overwhelming. Meetings are difficult to attend when they are in the working week and there is a cynicism I suspect that this is a done deal and what chance do we have in fighting	safeguarding within the supply chain. China is a major exporter of manufactured goods globally, and should not be excluded before the procurement process has begun.

		these faceless conglomerates. Do we have any human rights here? Our right to continue to live in our rural area and not in the midst of a massive industrial estate.	
BF-04		There will be a mental health crisis. Has any report been prepared on that? Rural communities are already being stretched to breaking point. The Lincolnshire Rural Support Network has reported an increase of 229 % in calls to their mental health and stress helpline over the past year. We all want to do our bit for the planet but I truly believe this is wrong on every single count and would be disastrous for our way of life, our communities and the environment.	Please refer to the response given for comment OEM-03 of **C8.1.19 The Applicant's Responses to Written Representations Part 3 [REP2-051]** regarding mental health.

Blyton Park Driving Centre / LNT Group [REP3-076]

Reference	Theme	Summary of Issue Raised	Applicant's Response
BPDC-01		It was understood that the Inspectors asked for a summary of representations in writing from all Affected Parties attending and participating at the Hearing. Equally he requested confirmation of any commitments made verbally on the part of the Applicants at the Hearing on 07 December at the Lincolnshire Showground. This is the statement on behalf of Blyton Park Driving Centre, as part of the LNT Group of Companies and	The Applicant notes these comments and refers the party to item 3A the Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 3 **[REP3-034]** and the responses to BPDC-02 to 06, below.

		follows representations made by LNT, at the Issue Specific Hearing No.3 under the heading of Social & Economic Impacts; at the Compulsory Acquisition Hearing; and latterly within the Issue Specific Hearing No.5. **Blyton Park Driving Centre & LNT Land Interest** On a point of clarification, the LNT Group (Blyton Park Driving Centre) have a lease in relation to its unhindered use of the former Blyton Airfield, as identified in the attached drawing, until 28 February 2046. The current lease was for 32 years from 1 March 2014 and is not contracted out of the Landlord and Tenant Act 1954, so the tenant has a statutory right to seek an extension of the lease. This lease has not been recently renewed, as asserted by the Applicants representative at the Hearing on 07 December. In confirmation, the lease was assigned from the original tenant to LNT Aviation Limited (but the lease was not changed), when LNT Aviation acquired the business in 2017. For all intents and purposes, the use of the former Airfield by Blyton Park Driving Centre is on a 'permanent' basis and as such, all rights pertaining to its established operating conditions, are required to be respected by the Applicants and their current development proposals. This is not the case at present.	

		Over a long period of time and from the advent of motor vehicle activity on the former airfield in the late 1950's (formalised in planning terms in the early 1990's), the current driving circuit has been used continuously over all this period to the present day. Throughout this period vehicle run-off areas from the circuit, to the south and east have been facilitated by the respective landowners and used by the Driving Centre continuously over this long and significant period. The Driving Centre & LNT representatives made their views known that they were laying claim to lawful use of the run-off areas within adjacent fields from a planning point of view and asserting prescriptive rights to the use of these areas for this purpose from a legal perspective. On this basis, it is claimed that those areas within the bounds of the proposed development area that interfere with this important element of the operation of the Driving Centre - are unacceptable.	
BPDC-02		**Wider Presentation of Issues & Representations** Blyton Park Driving Centre is a long-established business operating on the full extent of what remains of the former Airfield, north-east of the village of Blyton. It provides one of only three such facilities in the country, offeringopportunity for high-speed driver training and practice. It is active almost every day	The Applicant has responded to previous comments made by the Affected Party. Please therefore refer to LNT-01 to LNT-12 in C8.1.2 The Applicant's Responses to Relevant Representations **[REP-049]**, and the responses to LNT Group / LNT Aviation / Blyton Park Driving Centre [REP2-085] in C8.1.27 Applicant Response to Deadline 2 Submissions **[REP3-039]**.

		throughout the year and is attended by up to some 13,100 drivers/25,000 visitors per annum (based on 2023 figures). Blyton Park is acknowledged as an important element of the local economy within this part of West Lyndsey, directly employing 15-20 local people and making significant contributions to the sustainability of other local businesses, given the number of people it attracts to the area – such as local hotels, hostelries, and shops and not just in Blyton but within a much wider area. Representatives of Blyton Park Driving Centre and LNT Group attended all the Hearings 05 - 08 Dec because of the very severe and potentially devastating impact that the currently proposed solar panel arrays would have in relation to the long established and very active driving centre use/business. It is clear that the applicants have failed to give due consideration to the Driving Centres operating conditions, within their current assessment and development proposals. The Driving Centre & LNT have sought to raise concerns with the Applicants directly over a period of months and despite an initial site visit by one member of the Applicants Team in early September, over the period since, there has been no meaningful communication over the issues raised and no material alteration of the proposed layout of the development,	The Applicant has investigated the potential impacts the Scheme may have on operations at the racetrack based on this additional information presented during the examination process, building upon the responses made to the Affected Party in Section 3A of C8.1.22 Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 3 **[REP3-034]**. An ES Addendum has therefore been produced at Deadline 4 **[EN010133/EX4/C8.4.21.2]** to assess the additional glint and glare, noise, landscape, and subsequent in-combination impact on the economic performance of the Blyton Park circuit. Discussions with the Blyton Park Driving Centre and LNT Group are ongoing.

		the illustrative scheme for which, was only first revealed to us, at the site meeting in early September. The issues for the operating conditions of the Driving Centre are very significant, with very real and potentially dire consequences for drivers using the driving circuit and/or for the future operation of the current Driving Centre use. What's more, these issues and concerns evolved over the course of the Hearings, as the full extent and nature of the development was confirmed and that the Solar Panels would be expected to stand to a height of up to 4.5 metres was appreciated. The Driving Centre/LNT concerns are threefold: - i) Proximity of the proposed Solar Panels to the Driving Circuit and relationship of these to the whole of the driving circuit. ii) Potential deflection of Noise from the activities at Blyton Park that have been actively and successfully managed in this respect, over a long period of years. iii) Concern about the impact of glint and glare from the solar panels relative to driving conditions on the circuit.	
BPDC-03		**Proximity Issues**	The Applicant notes these comments. An ES Addendum has been produced at Deadline 4 **[EN010133/EX4/C8.4.21.2]** to assess the additional

		The proximity of the proposed solar panel arrays, immediately up to the southern and eastern edges of the driving circuit present extremely serious implications from a health & safety perspective in relation to usage of the driving circuit. This could result in potentially fatal impacts (i) for drivers using the circuit and/or (ii) from an on-going business and licensing perspective. This impact goes way beyond the realms of what may be considered as unneighbourly development and as such the proposed development as proposed at present, must be considered unacceptable, in so far as it relates to the Driving Centre. Over the course of the Hearing, the position of the representatives of the Driving Centre and LNT evolved, with their understanding of the height, scale and extent of the solar arrays proposed in proximity to the driving circuit. In particular, the solar panels proposed within both land parcels, extending into the Driving Centre's operation from the south, would intrude within the operational area to the east of the circuit and obscure line of sight/vision from the elevated central control facility, of a large part of the southern portion of the circuit. This obscuring of line of sight/vision would occur in a way that arable crops grown within this land, never has and never would do. This is a further impact of very serious concern,	glint and glare, noise, landscape, and subsequent in-combination impact on the economic performance of the Blyton Park circuit

		attributable to the proposals, as portrayed at present and would also have extremely significant impacts relative to the operational conditions of the Driving Centre. This would be from health & safety and on-going business and licencing perspectives.	
BPDC-04		**Potential Noise Deflection** This is an issue that also has potentially very serious consequences for the Driving Centre's operation, unless it can be offered suitable re-assurance and reliance on an assessment on the part of the Applicants. Noise from the activities on the Driving Circuit has been an on-going and very sensitive issue over the years, however, through positive monitoring and management in recent years, a relatively balanced and agreeable position has been reached with the local community and Authorities. It is not addressed by the Applicants anywhere, as to whether the introduction of the extensive arrays of solar panels (effectively hard surfaces) in lieu of noise absorbent arable crop/land, will result in any reflection or deflection of noise, in a manner to the disadvantage of the Driving Centre and its operation, if this issue is not fully and properly addressed by the Applicants, which to date, as far as we aware, the attention given by the Applicants has been negligible.	The Applicant notes these comments. An assessment of the impact of noise from the Blyton Park Centre due to deflection from the proposed solar panels on nearby receptors is included in the ES Addendum produced at Deadline 4 **[EN010133/EX4/C8.4.21.2]** that assesses the additional glint and glare, noise, landscape, and subsequent in-combination impact on the economic performance of the Blyton Park circuit.

BPDC-05		**Impact of potential** Glint & Glare While it is understood that this issue may have been sought to be addressed across the whole of the proposed development, it is very necessary for this issue to be specifically addressed in relation to the operating conditions of the Driving Centre at Blyton Park. Due to the extent of solar panel arrays, immediately up to the driving circuit to south and east and in view of the scale and number of the panels themselves, this is again a very serious concern for the operating conditions of the Driving Centre, and must be addressed in the consideration of the any Development Consent Order. Despite having raised this issue in our earliest of representations, this matter has not been addressed by the Applicants and communication and re-assurances on this issue remain unsatisfactory. Any issues capable of adversely affecting the operating conditions of the Driving Centre must be taken seriously by the Applicants. The potential of not doing so, may result in driver fatality or business fatality, neither of which are acceptable consequences of the proposed development.	As referred to in prior rows, the Applicant has undertaken additional work to establish the potential impacts of glint and glare on drivers using the race track. A glint and glare summary report has been shared with the Blyton Driving Centre operators and is submitted for Deadline 4 withinan ES Addendum **[EN010133/EX4/C8.4.21**]. The assessment concludes that solar reflections from the proposed development (the Cottam 3a site) are geometrically possible towards drivers using the race track but the proposed screening is predicted to significantly obstruct the visibility of the reflecting panel area towards users of the race track. Details of the screen planting are detailed on Figure 8.16.10 A Landscape and Ecology Mitigation and Enhancement Plan – Cottam 3a [REP-025]. If necessary, the developer will implement an interim mitigation measure (opaque fence) before planting has established, as is set out in the Ex4/C7.16_C Outline Operational Environmental Management Plan submitted at Deadline 4. The Operational Environmental Management Plan is secured via requirement 14 in the draft Development Consent Order for the Scheme [REP3-004]. Therefore, no impact is predicted upon drivers using the race track following the establishment of mitigation measures, and no further mitigation is required
BPDC-06		**Summary & Conclusions**	The Applicant refers the party to Agenda Item 4 of the Written Summary of the Applicant's Oral Submissions &

		In summary, the representatives of the Driving Centre & LNT believe that the Applicants, as "Agent of Change' have not demonstrated within the Hearings that they have given suitable or due consideration to the operating conditions of Blyton Park Driving Centre. As such, the extent of the development, in so far as it relates to the Driving Centre is not acceptable and cannot be permitted in its current form. While it was claimed at the Hearing by representatives of the Applicants that discussions were on-going, it is advised that the presence of Driving Centre & LNT representatives at the Hearings, was deemed imperative because communication was not on-going. Commitments were given during the Hearings that site meetings and discussions would be entered into by the Applicants and resolution of all our issues sought to be achieved. It is believed necessary that this commitment form part of the Applicants response in writing to the Inspectorate. It was noted also that the lead Inspector requested a specific Addendum Report from the Applicants dealing with the issues raised and matters of impact relating to Blyton Park Driving Centre. A commitment is made here that the co-operation of representatives of the Driving Centre and LNT Group, will be offered within reason, to enable the Applicants a proper	Responses at Compulsory Acquisition Hearing 1 on 7 December 2023 and Responses to Action Points **[REP3-036]**, under the heading "LNT Aviation (Blyton Park Driving Centre 'BPDC')". The ES Addendum produced at Deadline 4 **[EN010133/EX4/C8.4.21.2]** assesses the additional glint and glare, noise, landscape, and subsequent in-combination impact on the economic performance of the Blyton Park circuit.

		understanding and assessment of the issues concerned, to enable conclusions to be reached. Our position, as it has evolved over the course of the Hearings 05 - 08 December, is now to seek a reasonable 'buffer zone' around the Driving Centre, through a clear and necessary reduction in the arrays of solar panels in proximity to the driving circuit. This is reasonably required to safeguard and protect the established Driving Centres operating conditions and still subject to satisfaction on the matters of noise deflection and glint & glare. Finally, and under 'any other business' at the end of Fridays Hearing it was advised by the Driving Centre representative that: - *"On two occasions this week, the applicant's representatives have given off the record assurances with regard to the continued operation of our business and a solution will be found to have no impact, physical or financial, on our current long- established business".* It was asked "Can the applicants give those same assurances on record at this Hearing, especially given that the effect on the affected area for the applicants is a very small percentage, but potentially affects 100% of our business?" Positive re-assurances were offered across the room from the Applicants representatives in this respect, therefore, we would be pleased for this	

		commitment to be confirmed in writing within the Applicants written summaries to the Inspectors. Thank you for this further opportunity to confirm our concerns in writing and grateful for the attention of all concerned raised on behalf of Blyton Park over the course of the weeks Hearings.	

Broxholme Parish meeting (Solar Group) [REP3-077]

Reference	Theme	Summary of Issue Raised	Applicant's Response
BPM-01		My comments relate to the presentation of the developer's solicitor at the Open floor meeting on Thursday 7th December 2023. I have attempted to link my comments to the timings on the recorded video transcript. 44:00. Climate change was presented as a "matter of fact". This is a slight of hand. Climate change is indeed a matter of fact. In the natural history of the globe the climate had changed many times - why would it stop now? What is unclear is how much industrial activity contributes to a detrimental climate change. Science is never set, by its nature it is an evolving process. The argument that detrimental climate change is man made is often made against a back drop of climate	The Applicant notes these comments, and refers the party to the Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2 **[REP3-037]**.

		change alarmism (COP 28 was also slipped in as is usual in these cases).	
BPM-02		44:17. It is suggested that our elected representative to Parliament is inconsistent in regard to what is being said locally and in National Government. We would like more specific detail to support any contention that undermines faith in someone we have elected. This theme is returned to at 56:40.	The Applicant notes these comments, and refers the party to the response provided above at BPM-01.
BPM-03		50:58. The figure of 0.1% of total land is proposed for solar is given. It is the percentage of farmable land that is important.	The Applicant notes these comments, and refers the party to the response provided above at BPM-01.
BPM-04		52:14. An argument is made that re wilding and set aside is not objected to despite these taking away from crop production. Re wilding does not deface our natural environment like a solar factory and it absorbs carbon for a generation. Set aside land can be returned to production in a season unlike a solar factory which deprives it of production for half a century and leaves a potential brown field legacy.	The Applicant notes these comments, and refers the party to the response provided above at BPM-01. In response to the comments made regarding impacts on the local environment, the Applicant refers the party to response 7A-44 in the Applicant's Responses to Relevant Representations **[REP-049]**. In response to the comments referring to a "brownfield legacy", the Applicant refers the party to response SSPC-14 in The Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 1 **[REP2-048]**. The Applicant is committed to decommissioning the Scheme following a maximum operational period of 60 years, this being secured through requirement 21 of the draft Development Consent Order [**EN010133/EX4/C3.1_E**].

BPM-05		52:46. An argument is made that Lincolnshire has a heritage of power production and this justifies continuing blight with solar factories. We have suffered some of the downside of power stations and they were placed here not because of an overarching plan but because of the convenience of the proximity of the Nottinghamshire coal fields and the cooling water of the Trent. Similarly, the placing of the proposed solar factories has been driven by the convenient access to the grid and presence of rapacious absent landlords willing to profit. The Trent power stations did at least provide ample power from a comparatively tiny footprint as opposed to the feeble intermittent output of these projects on a massive footprint. Also, the Trent power stations did provide lifetime, well paid jobs for the locals to offset any disadvantages. Is the case being made that "you people in West Lindsey are used to having environmental blight so just suck it up"?	The Applicant notes these comments, and refers the party to the response provided above at BPM-01. The Scheme is anticipated to bring about a number of benefits. For further details of these, please refer to response CPC-07 in the Applicant's Responses to Relevant Representations **[REP-049]**.
BPM-06		53:32. A strange comparison is made between domestic television purchase and millions of solar panels. Many people strive to purchase electrical goods produced locally avoiding China but cannot. The dominance of Chinese production in electrical goods is not something the residents of West Lindsey have	The Applicant notes these comments, and refers the party to the response provided above at BPM-01.

		control over. Like many retired residents we cannot afford a plasma screen TV or an I phone in any event.	
BPM-07		58:17. Reference is made to the "legacy". By which we suppose is meant the vague benefits of running a solar factory for half a century. When the putative solar factory finished use is it proposed that 6 months later the site will be a sea of golden grain? What is a likely legacy is a brownfield site. Then developers using the same argument as "you are used to power stations" will propose that such land is suitable for shopping malls, industrial estates and open prisons. I doubt our grandchildren will thank us.	The Applicant notes these comments, and refers the party to the response provided above at BPM-01 and BPM-04.
BPM-08		58:38. Reference is made to "the greater good". This is another version of climate change alarmism emotional blackmail. Similar to guilt tripping over plasma screen televisions. The group of the 4 contiguous projects are presented as being National Significant Infrastructure. Individually big enough to Nationally Significant but kept discreet to disguise the enormous glass prairie they represent. Being "Nationally Significant" gives the impression that we re contributing to the Greater Good of the nation. Other distant bodies are the real beneficiaries.	The Applicant notes these comments, and refers the party to the response provided above at BPM-01. In response to the reference to "4 contiguous projects", the Applicant refers the party to the response given for comment GEN-06 of the Applicant's Responses to Written Representations Part 3 **[REP2-051]**.

Carol Gilbert [REP3-078]

Reference	Theme	Summary of Issue Raised	Applicant's Response
CG-01		Draft Development Consent Order Rev C Thorpe Lane, Sturton by Stow – Cottam 1 Part 6 (38) Felling or Lopping of Trees and Removal of Hedgerows and; Schedule 13 Part one, two and three District of West Lindsey Thorpe Lane, Thorpe in the Fallows Between points 12a and 12c and shaded purple on sheet 12 District of West Lindsey Thorpe Lane, Thorpe in the Fallows Permanent alteration of layout between points 12a and 12c and shaded purple on sheet 12 of the streets plan District of West Lindsey Approximately 303 metres of Thorpe Lane, Thorpe in the Fallows as shown between points 12b and 12c and coloured green on sheet 12 of the streets plan Temporarily closed to all traffic save for traffic under the direction of the undertaker District of West Lindsey Thorpe Lane, at Thorpe Bridge The provision of a permanent means of access to the authorised development from the point marked AC001 on sheet 12 of the access to works plan District of West Lindsey Removal of part of approximately 325.29m of hedgerow within the area	In certain locations where existing accesses do not exist, some very minor hedgerow removal is necessary to accommodate the access road between fields, land areas and solar panel areas. This removal is set out in C7.3 Outline Landscape and Ecological Management Plan **[EN010133/EX4/C7.3_E]** (the 'OLEMP') which is revised and secured by Requirement 7 of Schedule 2 of **C3.1_F Draft Development Consent Order [EN010133/EX4/C3.1_F]**. This removal will involve only very short sections of hedgerow to accommodate internal access roads and will not involve loss of trees, in particular trees protected under any Tree Preservation Orders (TPOs). In relation to the hedgerow H275, please refer to the Applicant's response to Action Point 4 within **Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 5 and Responses to Action Points [REP3-038]**.

		identified by a green line on sheet 12 of the hedgerows plan, reference H275 The above all appear in the dDCO Rev C. I note the reference to HR09 (H273) has the field access marked to be removed. (See Outline LEMP Rev A Oct 23.) The hedgerow to the south of Thorpe Lane between Sturton by Stow and Thorpe Bridge over the River Till still appears within the dDCO and covered by the blanket reference to be able to remove all or part of this hedgerow. The earlier reply to this question implied that access would be required to the array. There is no array access required at any point along this particular hedgerow since it is not within any array. Could the applicant answer the following question. What part of H275 is at risk of being removed (even if temporary) and specifically why	

Catherine Jane Booth [REP3-079]

Reference	Theme	Summary of Issue Raised	Applicant's Response

CJB-01		Good evening, My name is Catherine Booth and I am a resident of [...] along with my parents Mr Stephen and Mrs Clare Booth, who have resided here for 30 years. Following on from the concerns raised by myself and my neighbours at the previous open floor hearing, I am thankful that the Applicant has requested a change to the cable route, which they propose now run south of West Farm, away from our properties and the single-track access route to these properties. We have received communication from the Applicant that the construction compound, represented in the area of interest 14-298, would no longer be required in this original location, if the request to relocate the cable route is approved. Would it be possible to obtain some clarification or confirmation of this change to the location of the compound, as this change is not detailed in the letter sent by the Applicant to Mr Raywood on the 21st of November? Following on from my remarks at the previous open floor hearing in September, if the compound were to remain in this original proposed location, I would have major reservations about the noise and visual pollution this would cause for those living in the properties surrounding the compound. Additionally, as the photos submitted by Mr S and Mrs C Booth with the submission ID 23817 show, this single-track access route has poor visibility onto the main road, which has a 60-mph speed	The Applicant submitted C9.2 Change Request Application [AS-063] on 8 December 2023 detailing changes to the Order limits. Section 5 of the change request application [AS-063] explains that land to the west of West Farm is no longer required for the Cable Route Corridor and has therefore been removed from the Order limits. This includes the associated construction compound. A visual representation of the changes to the Order limits can be found as Appendix A in **C9.3 Supporting Environmental Information [AS-064]**. The Applicant is in regular communication with the Tillbridge project and have informed them of the changes to the Order limits of the Scheme, and the reasons as to why the decision was made.

		limit. The access route is close to the blind bend, where multiple accidents have occurred in the past 2 years that have required emergency service attendance. We are concerned that, if vehicles need to wait on the road for construction traffic to exit the compound, this increases the risk of collision due to the blind bend. Resultantly, I believe that having the construction compound in the area of interest marked 14-298 would not be the safest or most practical location, particularly if the application to have the cable corridor moved to the south of West Farm is approved. Further to this, considering the document detailing the statement of common ground between Cottam Solar Project and other solar projects in the area, I would like to draw attention to Figure 17.8 230314 on the Tillbridge Solar Webpage (https://tillbridgesolar.com/wp-content/uploads/peir/Volume III/Figure 17-8_230314_CumulativeFigures_TransportandAccessNew.pdf). This document shows that Cottam Solar Project and Tillbridge Solar Project share a cable route corridor search area and cable route boundary in Normanby by Stow. Is there an opportunity for the Tillbridge Solar Project and its Planning Inspector to be made aware of the proposed change to the cable corridor made by the Cottam Solar Applicant? We fear that, if the proposed changes to the cable route are not conveyed to this other project, a separate cable corridor would be made by the Tillbridge	

		Solar Project following the old, proposed route down our single-track access, despite the fact that it is not the optimum or safest route. Thank you	

Cheryl Felix [REP3-080]

Reference	Theme	Summary of Issue Raised	Applicant's Response
CF-01		We have been asked to put in writing what the speakers said at the Open Floor hearing on Thursday. To recap, I spoke about how our countryside and farmland is being affected by 'development' and, now, these solar farms, and how, as a result, good arable land (of all grades) is disappearing. My concerns were also about how we are not being listened to. The 39 houses being built opposite our home in were neither wanted nor needed, we all protested as a village but no notice was taken and a prime arable field opposite us is now under concrete. At Scampton we have had 2000 'asylum seekers' (so-called) scheduled for the disused RAF site. This too met major protests by residents and the Council but the plan was waved through anyway. The huge increase in the country's population, mainly caused by immigration, puts an even greater strain on our ability	The Applicant notes these comments, and refers the party to the Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2 **[REP3-037]**, especially table 3.15 which responds to each of the points made by Ms Felix in turn. In relation to food security, please refer to the Applicant's response reference 7A-15 within C8.1.2 The Applicant's Responses to Relevant Representations **[REP-049]**.

		to grow our own crops. Food security has become a major issue, and this has been recognised by the Commons' Environment Audit Committee which has designated food security as a public good. Hopefully the publication later this month of the Land Use Framework will put an end to these ill-thought out plans. Mr. Phillips, the solicitor for the applicants, gave a speech at the end of the meeting which totally disrespected the statements of the speakers and tried to justify the application as bring a much-needed environmental measure. Of course it isn't. He even had the gall to tell me, when I questioned him on house prices and whether we would even be able to sell our house in the future, that people would love to buy a house in the middle of 10,000 acres of glass panels! Maybe he'd like to buy it? But he doesn't live around here so isn't affected. The opening speech by Sir Edward Leigh MP trumps Mr. Phillips' patronising attempt at justification. Please LISTEN to the residents. We do NOT want these panels and their erection cannot be justified.	

Dorne Carole Johnson [REP3-081]

Reference	Theme	Summary of Issue Raised	Applicant's Response
DCJ-01		I was present at the Open Floor Hearing and concur with the oral representations made by parties regarding the need for a robust assessment on wellbeing. The applicant has used out of date data regarding well-being that is not appropriate for this project which is unprecedented in size and scale.	Please refer to the response given for comments 7A-026, 7A-038 and 7A-039 of **C8.1.18 The Applicant's Response to Written Representations Part 2 [REP2-050]**.
DCJ-02		In the applicants summary at the open floor hearing he stated inaccurate and flawed statements. Lincolnshire has no history of powering up the U.K. The power stations are in Nottinghamshire. The heritage is in farming and we must preserve the land for food and there are recent reports by the national audit office that our finite land should be retained for food production.	The Applicant notes these comments, and refers the party to the Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2 **[REP3-037]**. In relation to food security, please refer to the Applicant's response reference 7A-15 within C8.1.2 The Applicant's Responses to Relevant Representations **[REP-049]**.
DCJ-03		There is no government policy for ground mounted Solar of this size and scale. In the national policy statements it mentions Solar farms on a much smaller scale and that all sources of land contaminated land, industrial land and brownfield land should be a preference.	Please refer to the response to 7A-06 above and the response given for comment ALT-01 of **C8.1.19 The Applicant's Responses to Written Representations Part 3 [REP2-051].**

Emma Hill and Nicholas Hill [REP3-082, REP3-096]

Reference	Theme	Summary of Issue Raised	Applicant's Response
ENH-01		Location Mr & Ms Hill are owners of agricultural land which is situated in open countryside, west of the A156 High Street, Marton, (Land Plan Sheet Nos. 12, Plots 12/9 & 12/18). The Site sits within Flood Zones 2 & 3 identified by Environment Agency's Flood Map for Planning. **Background** Mr Hill has held long-term plans since the age of 18 to have an agricultural business. Mr & Ms Hill bought this 15 acre area of land to realise this long held dream. They also bought a further 23 acre field in the area in tandem to help develop the agricultural business. Mr Hill is the 5th generation of his family to live in the village and wants to remain and grow the family business for the future and future generations. The land currently has a crop of sugar beet growing in it which will go to the British Sugar factory at Newark. This is a much needed crop. During last year's weather conditions, the sugar beet crop across Europe was impacted. Locally grown food is needed by us all. Mr Hill has worked this land to bring it back into food production. Prior to Mr & Ms Hill's ownership the land was not utilised for approximately a ten year period. Therefore, Mr & Ms Hill's agricultural business is viable	The Applicant is aware of the planning permission held by the landowners for two agricultural barns within the Order limits on the Cable Route Corridor. The Applicant reviewed the Order limits for its Cable Route Corridor in light of the approved planning application and this document was submitted at Deadline 3 as **C8.2.9 Land South of Marton Grid Connection Options Report [REP3-040]**. The cables proposed by the Scheme would still fit within the Order limits across the landowners' land when the barns were built. The Applicant also refers the party to Agenda Item 4 of the Written Summary of the Applicant's Oral Submissions & Responses at Compulsory Acquisition Hearing 1 on 7 December 2023 and Responses to Action Points **[REP3-036]**, under the heading "Ms Garbutt (on behalf of Mr Nick Hill and Ms Emma Hill)".

		and growing. Moving forward they want to develop and expand their agricultural business further. To this extent Mr Hill sought planning permission for the erection of 2 agricultural storage buildings alongside the access to this field to house machinery and equipment. These buildings each have a footprint of 64 sqm together with a permeable hardstanding.	
ENH-02		Planning Permission Planning Permission was granted January 2023 by West Lindsey District Council. Prior to this Mr Hill & Ms Hill met with the Applicants representatives. Unfortunately, both Mr & Ms Hill have felt humiliated and intimidated by the Applicants representatives. On one occasion Mr Hill was laughed at by the Applicants representatives, saying 'You haven't got planning permission yet'. They have also been repeatedly told by the Applicants representatives that the land in question will be compulsory purchased. West Lindsey District Council received an objection from Pinsent Masons regarding Mr Hill's Planning Application in which they wrote that they met Mr Hill	The Applicant refers the party to Agenda Item 4 of the Written Summary of the Applicant's Oral Submissions & Responses at Compulsory Acquisition Hearing 1 on 7 December 2023 and Responses to Action Points **[REP3-036]**, under the heading "Ms Garbutt (on behalf of Mr Nick Hill and Ms Emma Hill)". In this summary, the Applicant refutes the assertion that it has sought to unduly influence the local planning process. In relation to the comments regarding the inclusion of compulsory acquisition powers, the Applicant refers the party to the response given for comment GEN-03 of **C8.1.19 The Applicant's Responses to Written Representations Part 3 [REP2-051]** and SSPC-02 of the Applicant's Responses to Relevant Representations **[REP-049]**.

		on site and that as such they and would seek an extension of time to his planning application. Mr Hill, then wrote to the Case Officer to say he did not want an extension of time. It appeared to both Mr & Ms Hill, that the Applicant sought to unduly influence the planning process without his consent. Mr Hill & Ms Hill wishes to draw the conduct of the Applicant to the ExA's attention as it is intimidating and as such represents relevant evidence for the ExA to consider in terms of the agreements being presented to them and how they have been obtained by the Applicant.	
ENH-03		Notwithstanding, Mr & Ms Hill have endeavoured to engage in dialogue with the Applicants representatives and to that extent have offered a Wayleave or Lease of their land by way of accommodating the Applicant's needs. However, Mr Hill has been told that the Applicant is seeking an Easement only. It appears to Mr & Ms Hill that if the proposed development is 'temporary' (albeit 60 years), then a wayleave or lease agreement would suffice. Mr & Ms Hill are unsure why the Applicants need a permanent Easement agreement.	Discussions are ongoing with Mr and Ms Hill regarding the nature and form of the property agreements, and it is understood that the main obstacle to agreeing terms is the amount of compensation being offered, rather than its format.

		The Gate Burton Solar Projects representatives are now considering offering a lease agreement to Mr & Ms Hill, in correspondence dated 31st October 2023. Therefore, Mr & Ms Hill request that this Applicant does the same. This will then enable them to have some long term assurety that the land in question is returned to their ownership. In addition, Mr Hill & Ms Hill, intend (with the appropriate Planning permission) to apply for other agricultural buildings to develop their local business. The presence and extent of the cabling for all four NSIP projects will in reality prevent Mr & Ms Hill from carrying out their agricultural business plans and use of the land.	
ENH-04		Finally, it is understood that, Tillbridge Solar are seeking use of an alternative field adjacent to Mr & Ms Hill's, therefore, they ask why this Applicant cannot also do the same and use this alternative available site.	Whilst the Tillbridge project have not yet submitted their DCO application into the planning system, the most recent targeted consultation does show an additional field within their order limits to the south of the land. However, this does not mean that that project will definitely use that field as Mr and Ms. Hill's land are still within their proposed Order limits. The grid connections options report **[REP3-040]** concluded that the existing route was still the most favourable for environmental and property reasons, and so there is no intention by the Applicant to alter the Order limits of the Scheme in this location.

		Mr & Ms Hill do not want compensation, they want their land to use and enjoy. Mr & Ms Hill believe their Human Rights will be affected by the proposals and that the Applicant does not have a compelling case.	The Applicant refers to section 9 of the Statement of Reasons **[EN010133/EX4/C4.1_C]** which considers impacts on human rights.
ENH-05		**Summary of Oral Submissions post Applicant's Response to statement** Mr & Ms Hill notified the Applicant and the Planning Inspectorate that they were not available for negotiation over a period of time due to a family bereavement. The Applicant inferred at the CAH1 that Mr & Ms Hill were not engaging in the process of the negotiation. This statement is entirely misleading and misrepresentative of the situation and is inaccurate and offensive to Mr & Ms Hill and as such should be redacted from the recordings and typescript of this Hearing. Mr & Ms Hill do not want compensation. They want the free enjoyment of land they already own. Mr & Ms Hill have long held dreams to develop their land and business for the future of their family and local community needs. However, to accommodate the Applicant, Mr & Ms Hill have offed a Lease agreement only. The Gate Burton Solar Project is negotiating with Mr & Ms Hill along these terms therefore they hope the	The Applicant notes the comments made but strongly rejects the assertion that it has been misleading or misrepresentative of the situation.

		Applicant for the Cottam Solar Project can do the same for consistency.	
ENH-06		When they purchased the land at Auction, there were no details of the proposed scheme in the land pack and their solicitors did not inform them of the proposed solar schemes. Therefore, they had no prior knowledge of the Cottam Solar Project.	The Applicant notes that the Scheme underwent a comprehensive consultation process as detailed in **C5.1 Consultation Report [APP-021]**. The Applicant cannot comment on whether the previous landowner notified Mr and Mrs Hill of the Scheme.
ENH-07		The Applicant recommended the use of a Land Agent or solicitor at which point the Applicant was advised that Mr Hill did not believe such representatives would be impartial if they were paid by the Applicant. (Subsequently, Mr Hill has also been advised by a Land Agent that they have to operate within the terms of negotiation as set by the Applicant). However, it was agreed in the Hearing, to pass on this recommendation and offer of paying for such an agent to Mr & Ms Hill.	Land agents are under a professional obligation to act with the best interests in mind of the landowners who commission them. A land agent is free to negotiate how they wish, with the aim being to achieve agreement with the other negotiating party, in this case, the Applicant. The Applicant reiterates its commitment to funding the costs of an independent land agent to advise Mr and Ms. Hill.

Fillingham Parish Meeting [REP3-083]

Reference	Theme	Summary of Issue Raised	Applicant's Response
FPM-01		Picture this, it's a bright day, Martin Clunes is smiling out at you and he's going to discover the truth behind solar farms, get rid of those 'myths and misconceptions.' He's going to show us that, standing with a farmer, in a beekeeper suit and in a small field with 2m tall solar panels, solar has benefits for the	The Applicant notes these comments, and refers the party to the Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2 **[REP3-037]**.

		farmer, benefits for biodiversity and will not be invasive, imposed on communities and will provide the electricity that the country needs… Well, this is what Island Green would like to present, because they have commissioned the video. Now picture this, not just a few acres across different farms in different areas, benefiting a local farmer who is still farming alongside but concentrated over 10's of thousands of acres in one district, with 4 m high panels, here there will no longer be agricultural farming alongside, there won't be the land left. Where will the biofuels be grown? Where will crops be grown for us to eat or animal feed? The benefits are limited to a few, who may not even actually be farmers on the ground. Now consider this…the change to the National policy Statements on renewable energy November of this year, which puts solar as a critical national priority well, who were the lobbyists behind this? Well, strangely they are sat here now… they represent the companies behind these solar projects, they have put millions into persuading us and government that ground solar industrialization is the way to give us energy. That's because they make money, it's relatively easy to construct solar, of course not here in the UK, they won't create any long-term jobs for the region, they will	

		change the landscape for 40-60 years, a lifetime or is that more than a lifetime? They will cause disruption in the building, won't provide the actual solar the companies imagine, and what actual guarantees are there at the end of its lifetime? But that's ok because these companies as we heard yesterday will have discussions between their topic leads, they will use their professional judgments… is that not like marking your own homework as a child? Is that not the same as lobbying to ensure that government policy reflects your priority? Martin Clunes askes 'why isn't everyone doing it' (solar) well because, it is not the answer the country needs, here is not the right place to put a concentrated area of large ground mounted solar panels, the place for solar is on roofs, in small areas where the local's benefit, as part of a family of renewables. Did anyone tell Martin Clunes he had half a story? Like we are presented with part truths, and complicated arguments, that don't add up. Whilst these companies lobby and belittle us on social media, they are not actually doing this for green reasons, they aren't providing sustainable power for the future, they are overplanting, they are tying up grid connections, they are racing to be the company that is	

		allowed to put forward a proposal that is granted, they are here to take the contracts for difference. We are an island and land is precious, we need to consider carefully it's use before we act, land needs to do so much more than solar to rectify our damage that humans have done to the land and the climate. And when these companies are long gone, for they will sell on and evolve, move to the next big project, and their legacy is debated in years to come, when solar should have been placed on roof tops as a policy before we were in crisis, when there is no one left accountable for their actions… what will our legacy be? How will we justify this to our grandchildren and great grandchildren… I personally can say I tried to protect agriculture, a way of life, my community, I tried to protect wildlife and habitats. I put solar panels on my roof… but will that have been enough? Well I am trying… will others?	

Graeme Beattie [REP3-084]

Reference	Theme	Summary of Issue Raised	Applicant's Response
GB-01		Having listened to the many representations at the recent open floor hearing, I just wanted to add my support to the strong opposition to these massive schemes in our local countryside. There is no doubt	The Applicant refers to its comments on energy security and security of supply at different times of the

		there are going to be long lasting effects for us and our descendants if this goes ahead - and for what? Energy security and decarbonisation of our power supply?? Winter supply is a big challenge for us and as I write this at midday on December 13th, a typical dull Winter Wednesday, we are generating 40GW in the UK. 30% is coming from renewables. However, only 2.7% comes from Solar, which by 4:00pm will be nil - and even if this scheme and others go ahead, at their very poor winter efficiency levels, they will have a minimal effect on our winter energy supply - but a massive '24hrs a day for 60 years' effect on our countryside, our wildlife, our wellbeing and our lifestyle. The advantages will never never outweigh the effect on our County for many years to come. The only advantage appears to be in the profitability for the developers and their advisors. I strongly object to this and the other applications.	day and year in response to the ExA's FWQ (Q1.3.5) in **[REP2-034]** (p83 and following).

Helen Mitchell [REP3-085]

Reference	Theme	Summary of Issue Raised	Applicant's Response
HM-01		Comments on Mr Gareth Phillips This is not a summary of an oral submission, rather my thoughts and comments on Mr Phillips submission made on behalf of the Applicant.	The Applicant notes these comments, and refers the party to the Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2 **[REP3-037]**.

		Mr Phillips repeatedly made derogatory comments about Sir Edward Leigh when he was no longer on the call. I was surprised this was allowed to continue as earlier in the hearing Mr Cridland had been reluctant to let IP Peter O' Grady read his poem entitled 'The Applicant' as he was concerned it might be offensive. I wonder whether Mr Phillips would have used such scathing language had Sir Edward Leigh still been on the call, or even in the room. He went on for some time about it not being a rash charge and that it was policy of Sir Edward Leigh's government. This does not mean Sir Edward agrees with the policy. Mr Phillips stated that golf courses take up twice the amount of land than the amount proposed for solar. I find this a nonsensical comparison because golf is a pastime people enjoy participating in, a social activity. They bring income to the country in their own way. They do not look ugly or block views or have dangerous battery storage or come with all the other negatives that solar parks do. They can look spectacular and do not in anyway ruin landscapes. It was a pointless thing to say. Mr Phillips stated that Defra is not concerned about a food crisis. That may or may not be the case. They are however, concerned about the future of hedgerows. Taken from their website they say "Currently, farmers	In relation to the comments regarding food security, please refer to the Applicant's response reference 7A-15 within C8.1.2 The Applicant's Responses to Relevant Representations **[REP-049]**. In respect of the comments made regarding hedgerows, the Applicant refers the party to the response to comment CG-01 above. In relation to the comments made relating to health and wellbeing, the Applicant refers the party to response BLPC-07 in the Applicant's Responses to Relevant Representations **[REP-049]**. The impacts of importing materials required to construct the Scheme been accounted for in Section 7.8 of Chapter 7 Climate Change **[REP-014]** in the Environmental Statement, which shows that the savings in CO_2e emissions far outweigh those generated by material sourcing, transport and construction.

		must not remove hedgerows without prior notice given to local planning authorities, must maintain a buffer strip along their hedgerows, and must not cut or trim hedgerows during bird nesting and rearing season. We want to ensure the regulations work for wildlife, the environment and for farmers. This consultation is seeking your views on the best way to maintain and improve existing protections, as well as our approach to enforcement. We are also seeking your views on where we should focus our ambitions for future hedgerow protections." I will make sure to put my views to them about the intention of these solar parks to remove miles and miles of hedgerows to make for an easier installation. Mr Phillips referred to Lincolnshire and its history of being a power base, to quote him, in his very condescending manner, "the cooling towers give that game away". 100% incorrect. I suggest Mr Phillips has another look at his clients maps as he will find that the cooling towers are actually in Nottinghamshire. Not really an argument when you don't name the right county. As an afterthought Mr Phillips went on to mention how he had listened to people's concerns about mental health. He stated this has been addressed in the Health Impact Assessment in the Environmental Statement	

		Chapter 21. I personally couldn't find anything about mental health in that document, and who has been consulted on this? I have not received a questionnaire through my letterbox asking me how my mental health will be affected by these projects. So, how can they come to the conclusion that it won't be, which is what Mr Phillips seemed to be implying. His statement about no one being concerned about or objecting to purchasing electrical goods which are made in China was clutching at straws. As consumers, unfortunately we don't have much choice unless we choose not to own a tv or any electrical kitchen goods as this is where manufacturers have chosen to source their parts. If I could buy a device which didn't contain any Chinese components, believe me I would. I just find this while scheme a complete nonsense. I cannot get my head around the dichotomy of importing solar panels, potentially importing more food as a result of having less farm land, all producing a carbon footprint, in order to decarbonise the UK. Mind boggling.	

I Gordon [REP3-086]

Reference	Theme	Summary of Issue Raised	Applicant's Response

IG-01		I am responding to the closing speech made by the Applicant at the OFH2. He indicated that Lincolnshire was not just a food producing hub and the "breadbasket of the nation" as someone mentioned, but it was an energy county, mentioning the power stations. Now, locals call the area of the Trent valley "Megawatt Valley". These now closed halls of power were all in Nottinghamshire, not Lincolnshire. West Burton, Cottam, High Marnham, and Staythorpe to list a few. The energy contribution by Lincolnshire is however of national importance in another way. In the form of food production essential for sustaining life and in Bio fuels essential for green and flexible power. Agricultural Lincolnshire is primarily an arable county and is indeed the "breadbasket of the nation" The Applicant then went on to say that Golf courses cover more land than solar plants. This may be true at the moment, but I think recreation is an important part of life and must not be devalued, he's obviously not a golfer. I also don't place ugly and destructive solar plants in the same catagory as golf courses. Then he quoted that if all the solar schemes in the pipeline were built they would only cover a fifth of all farmland!! I am sorry, but a fifth of our farmland to solar is a shocking admission and if anyone can put an	The Applicant notes these comments, and refers the party to the Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2 **[REP3-037]**.

		'only' in that statistic is clearly out of touch. This plan is madness! I think he also mentioned about all the land that is in 'set aside' and therefore redundant. The difference is that set asid' is immediately reversable. I have lived in this area for over 50 years and being of land management stock, I can say there is very little set aside around here. I did not speak at the hearing, but my thoughts are that the Land v power arguement for solar means that they are only fit for rooftops in this country. I believe that this scheme needs to go back to the drawingboard. This and the other proposals are being forced upon residents and the impact and harms will inevitably undermine renewable support. One last point directed at the Applicant. Do not slag off our MP hoping to get some sort of public applause. Some MPs have respect and not all are fools. Thanks.	

Jeffrey John Summers [REP3-072, REP3-087, REP3-088 and REP3-089]

Reference	Theme	Summary of Issue Raised	Applicant's Response
JJS-01		AGRICULTURAL SOILS. NEW INFORMATION.	The development of Haricot Bean variety that may be an economically viable option for UK farms is noted. UK farms already produce and export pulse crops

		UK Baked Beans. UK Agriculture is constantly evolving in a wide range of technologies. (ie) seed, fertilizers, agronomy, machinery and a whole range of sciences. this year has seen a major break through in the development of a UK Haricot Bean. that good old british favourite; The Baked Bean. over 100,000 tonnes are exported into the UK every month. More than 2 million tins consumed every day. At present all Haricot Beans are grown in the US, CANADA, ETHIOPIA, and CHINA. The project of producing a UK variety of Haricot Beans was developed by scientists in Warwick University which took 12 years. This years crop has been tinned at a factory in Spalding LINCOLNSHIRE. This factory alone produces 264 million tins of beans annually , all imported from across the world to supply the UK network of shops and supper markets. This is just one example of what is going on in the Agricultural / food industry. 1.2 Million tonnes of beans imported every year into the UK. Creating thousands of tonnes of Co2 polluting the atmosphere.	including broad bean, much of which is exported. Development of the proposed Solar Farm will not impede the introduction of new crops for UK farmers. The Applicant refers to their comments on energy security and security of supply at different times of the day and year in response to the ExA's FWQ (Q1.3.5) in **[REP2-034]** (p83 and following).

		By growing our own Baked Beans the benefits will be enormous. UK PRODUCED, UK PROCESSED, UK BRED WITH UK JOBS. MILLIONS of pounds can be generated for the UK economy for all to enjoy with tremendous environmental benefits attached. This is just one more reason why we should not take UK arable soils for Solar Panels. The government has recently announced TWO more Neuclear plants to be established. Why destroy one industry with another ? Lets reap the rewards of all our industries without destruction within.	
JJS-02		AGRICULTURE VERSUS SOLAR FARMS. DEC 23. MR CHAIRMAN I have to question the economic viability of this application and the level of informed wisdom which has been applied so far. I immediately think of HS2. I have previously put to the hearing how desperate some one must be to promote one section of industry whilst helping destroy another.	As per Paragraph 19.9.1 of the ES **[REP-010]** development of the Scheme will not result in the loss or degradation of agricultural land.

		As previously stated, Oxygen, Water and Food are the three essential elements which sustain life. WHY reduce our ability to produce food, an essential component of sustainable life, for a 60 year contract to produce electricity on a precariously spasmodic platform. Recently, due to winter weather conditions my solar array has produced absolutely zero energy. A big fat zero is displayed on my screen!!! At a time when we are all shivering in our boots with cold and consuming energy in colossal volumes; PV Panels stand idol !! THERE FORE energy is being produced by other mechanisms. The mechanisms we are all familiar with, power stations and wind turbines. With some obviously being imported across the channel. MR CHAIRMAN. Tonight I would like every one to think about how Agriculture , supported by soil has evolved into an industry producing over twice as much food per acre since I was a boy. An overwhelming feet! Hard work, dedication, research and development to meet the world wide need for food to feed an ever burgeoning world population. I will give you an example of how agriculture evolves.	

		The UK imports roughly 100,000 tonnes of HARICOT BEANS each month from USA, CANADA, ETHIOPIA and CHINA. Haricot beans are used to make Baked Beans. A factory in Lincolnshire produces and packs 264 million tins of baked beans every year from imported beans. It has taken 12 years at warwick university for scientists to develop a variety of Haricot Beans which can produce a viable crop in the UK. BRITISH grown Haricot beans have been cooked and tinned in Lincolnshire for the first time. This now brings me to the real point hear. BULK CARGO SHIPS CREATE 440 MILLION TONNES OF Co2 per year average. One container ship is equivalent to 50 million cars 16 cargo ships produce as much Co2 AS ALL THE CARS IN THE WORLD. THE MAIN REASON FOR CREATING SOLAR FARMS IS TO REDUCE OUR CARBON FOOTPRINT. IF AGRICULTURE IS ALLOWED TO CONTINUE IT'S RECORD OF APPLYING GROUND BREAKING TECHNOLOGY ADVANCEMENTS . THEN EVEN GREATER LEVELS OF Co2 REDUCTION COULD BE ACHIEVED BY GROWING OUR OWN, REDUCING SEA MILES AND KEEPING BRITAIN FARMING.	

		AND, PLACING SOLAR PANELS WHERE THEY DO NO HARM.	
JJS-03		Following todays meeting 5th Dec 23. 1. ARCHAEOLOGY. Following the applicants explanation to the process which they claim to have followed. The lady from Notts County Council, specializing in archaeology was unsatisfied with the approach taken by the applicant. This i find to be of some concern as i know from experience, valuable historic finds have been recovered from sites not recognised as being of interest. I personally remember a site being uncovered in an open field near Lincoln where several bodies where discovered. This site was not previously known. The remains were lying approximately 20 cms below the surface. If we are to be serious about the subject then due process should be observed.	The Applicant refers to their responses during ISH2 (see Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing [**REP3-061**]). In particular as evidenced at ISH2, the Applicant considers the archaeological evaluation, which comprised geophysical survey **[APP-110 to APP-122]**, air photo and LiDAR **[APP-124]** and targeted evaluation trial trenching **[APP-129 to APP-130]** to be sufficient to inform the DCO application and is in line with NPPF, NPS EN-1, NPS EN-3, the Central Lincoln Plan (Policy S57), as well as guidance produced by Historic England, the Chartered Institute for Archaeologists and the Lincolnshire County Council Archaeology Handbook. The identified burials are located adjacent to contemporaneous ditches that were recorded by the geophysical survey. The burials were located at depths of between 30 and 40cm and had been heavily disturbed by plough damage. Consequently, the Scheme provides a mechanism to record and preserve the inhumations prior to their further impact by agricultural activity. As detailed in Table 6.1.1 of C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation WSI [APP-131], the Applicant has proposed this area for open excavation.

JJS-04		2. SOILS. We listened to the applicants learned representative speaking about soil types and moisture / water content of different soils. What he failed to explain was how sandy soils drain more easily after rainfall but fail to retain any moisture to sustain crops in a dry period. Thus producing very low yields and in extreme cases, a crop failure. Medium soil types respond typically as a half way house. Silt soils are the very best as most are found along side rivers and estuaries as their composition has been made up by flooding and depositing river silt onto open land hundreds of years ago. Because of their fine sand particles they not only drain freely but retain moisture better than any other soil type. Agricultures holy grail! On the other hand, grade 3, 3a and 3b are heavy soils due to the clay fracture composition. These soils also contain very fine sandy particles bound together with varying amounts of clay. The clay content does not allow them to drain as well as non clays. BUT they do posses an exceptional ability to retain moisture in very dry periods which are being experienced more frequently. Agriculturalists frequently dig pits in clay soils six feet deep to visually demonstrate how the fine	There are a range of factors that limit ALC grade of which soil wetness and workability is one. Soils with a high clay content, such as those found within the site, typically have a heightened soil wetness and workability limitation. Such soils may also have a reduced drought limitation when compared to very light, stony and/or shallow soils. However, there is no interaction or averaging between the factors limiting ALC Grade. Large areas of agricultural land within the sites have a significant wetness and workability limitation as described in Paragraph 19.8.7 of the ES **[APP-010]**. This limitation on overall land quality and versatility is imposed owing to the constraint on a farmer's opportunity to carry out landwork within narrow time windows, without causing persistent damage to soil structure that further exacerbates soil wetness problems. It should also be noted that if a farmer has not had an opportunity to successfully establish a crop owing to wet conditions in autumn or spring, good water availability in the following summer does not mitigate the preceding failure of crop establishment.

		root hairs for Winter Wheat and Winter Oilseed rape have penetrated the clay soils to a depth of 3 foot whilst searching out moisture and nutrients. As the increasing arid areas of the world move northward. These clay soils will be a corner stone for the production of many crops. In a very dry year winter wheat, winter barley and winter oilseed rape excel. Should wet conditions come early in the autumn then they can be sown in the spring. All cereals, maize, some vegetables and pulses, miscanthus and forage crops can be grown on grade 3,3a and 3b soils. Knowledge is power. Knowing how to nurture the soil and not abuse it. 3. WORKING WITH SOLAR FARMS. Numerous issues will arise throughout the life of a solar farm. 1. pernicious weeds will prevail. Thistles, docks, cleavers, ragwort, rosebay willow herb, nettles and more creating an enormous seed bank to infect neighbouring fields growing crops. 2. Attempting to graze sheep beneath the panels would be a nightmare. rounding up the sheep would be a fiasco with dogs chasing sheep up and down the rows of panels. Identifying health problems would be difficult. Counting them impossible. rounding them up	

		for foot treatments, dipping, worming and all other operations adding up to 8 to 10 times a year would be like watching a wild west rodeo.	
JJS-05		3. LAND RECOVERY. Potentially a large percentage of the fields would require new underground drainage schemes applying costing thousands of pounds per acre. Has that been included as part of the restoration plan? Recently i have seen photographs of machines working on solar sites, 2 feet deep in a fluid mire of churned soil. Not only will this destroy the top soil but compact the subsoil to a further depth of three feet making the land impermeable creating surface runoff.	The AHDB Field Drainage Guide [4] notes on page 4 that field drains can be expected to have a useful life of at least twenty years. It is therefore likely that some field drains within the Scheme may be due for renewal following decommissioning of the Scheme. Any renewal of field drains will be a decision for landowners following decommissioning as it is at present. The outline Soil Management Plan [APP-146] includes measures to prevent handling or trafficking over of soils wetted to a plastic consistence. These measures are specifically to avoid the degradation of soils within a construction site. It should also be noted that under the now closed Renewable Obligation Certificates (ROC) scheme, sites that were not commissioned by the beginning of April had to wait until the following year to qualify for ROC, creating an economic incentive to develop sites over winter. That economic incentive no longer exists.

John Hallam [REP3-090]

[4] AHDB Field Drainage Guide https://ahdb.org.uk/drainage

Reference	Theme	Summary of Issue Raised	Applicant's Response
JH-01		The applicants response given by Gareth Philips. In his response he suggested that taking out 20% of available agricultural land in the country if all solar projects went ahead would not have a significant effect on food security i find this difficult to believe.	Please refer to the Applicant's response reference 7A-15 within C8.1.2 The Applicant's Responses to Relevant Representations **[REP-049]**.
JH-02		It was also suggested or implied that Lincolnshire was a centre for energy creation due to the large number of power stations this is not true there is possibly one power station in Lincolnshire the others that can be seen from this county are not in Lincolnshire. Lincolnshire is primarily rural area dedicated to the production of food. The proposed solar farms will change what is a rural landscape in to one of an industrialised area which will devastate the visual appearance of the area and the existing diverse natural habitat. It can not be proved that the scheme will have a net biodiversity gain.	Please refer to response given for comments LCC-23 **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]** relating to landscape. Please refer to response given for comment ECO-18 within **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]** relating to biodiversity.
		He also alluded to the ethical procurement of the panels from China being an issue for local planners why is this the case. To suggest because people get other items from China then there is no reason to question how the solar panels are made is not acceptable if there are issues with how the panels are made then it should be addressed.	Paragraph 7.3.1 and 7.3.2 of the Skills Supply Chain and Employment Plan **[APP-349]** sets out the safeguarding measures taken to prevent human rights abuses, and is secured by Requirement 20 in Schedule 2 of the Draft Development Consent Order **[EN010133/EX4/C3.1_F]**. Paragraph 5.4.7 of the Skills Supply Chain and Employment Plan **[APP-349]** states that: *'Any procurement of supplies internationally will*

			comply with both national and international law, and all policy and safety measures will be adhered to in the transportation of supplies.'
JH-03		How can the issue of mental health be addressed when no one knows what impact a scheme of this scale will have there are no other solar farms of this size in the country affecting so many small rural villages. The impact of one solar farm would be devastating four would be unimaginable and would destroy the landscape for the foreseeable future to compare these to golf courses is folly.	Please refer to the response given for comment OEM-03 of **C8.1.19 The Applicant's Responses to Written Representations Part 3 [REP2-051].** The Applicant has prepared a summary document which draws together the information on human health **[EN010133/EX4/C8.4.21.1]**. This document will therefore set out how the issue of mental health and wellbeing has been assessed and considered in the Environmental Statement. **C6.2.8 ES Chapter 8_Landscape and Visual Impact Assessment** Revision A **[REP2-008]** (the 'LVIA') includes a full and detailed assessment that deals with both effects [para. 8.4.23] on the landscape itself and effects on the visual amenity of people, as well as changing views and potential indirect effects on health and well-being. The LVIA process is iterative [paras. 8.1.1, 8.4.5, 8.6.1, 8.8.2, 8.8.3 and 8.11.1]and as a result, the design of the Scheme changes to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process. This assessment is undertaken in accordance with **C6.3.8.1 ES Appendix 8.1 LVIA Methodology [APP-068].** The LVIA includes a suite of 67 viewpoints [paras. 8.5.188, 8.5.189 and 8.5.197] that cover a wide range of

			visual receptors, including public locations such as transport routes, PRoW and residential properties. There are also an additional 25 viewpoints at the request of LCC [para. 8.5.200] that were agreed at the LVIA Workshops held prior to submission that are included in the LVIA assessment. The LVIA also considers that for some aspects of the Scheme (the construction in particular) [para. 8.6.2], the effects may be an issue. Where impacts and effects are identified then strategic landscape mitigation measures [para. 8.6.3] are applied to offset or remedy any adverse effects.

John L Parkin [REP3-091]

Reference	Theme	Summary of Issue Raised	Applicant's Response
JLP-01		I am a retired General Practitioner, and still work for the Lincolnshire Integrated Care Board with over 30 years' experience of health in Lincolnshire. I was also on the board of both West Lincolnshire and Lincolnshire Clinical Commissioning Boards. I am the current Clinical lead for the West Locality, which means that I look after the delivery of healthcare in both Lincoln and Gainsborough and its surroundings. • I was concerned by the number of residents who stated how these schemes would affect their Mental	The Applicant has prepared a summary document which draws together the information on human health **[EN010133/EX4/C8.4.21.1].** The Applicant has previously responded to interested parties and the 7000 Acres group specifically on matters relating to the scope and findings of assessment of human health and wellbeing impacts as a result of the Scheme. The Applicant therefore refers to the following locations: • Comment 7A-039 of **C8.1.18 The Applicant's Responses to Written Representations Part**

		Health and Wellbeing. • The documents on Human Health and Wellbeing are described in terms of the construction and the decommissioning phase. There is very little around the operators cycle and does not highlight the impact nor cumulative impact on Human health and Wellbeing over the 40 (now 60 years) on the residents living within these developments. • I was not confident that the specific hearing on Human Health and Wellbeing has been addressed. The wider determinants of health need to be tackled, as these determinants form the basis of my concern going forward. Both the socioeconomic and environmental aspects play an important issue when considering health and wellbeing. • I am concerned as to the cumulative impact which may worsen health inequalities, marginalising already identified areas where deprivation exists, such as in the town of Gainsborough, which has not been mentioned at all by name within any of the documents presented by Gate Burton and Island Green Power. This has the potential to impact on the work the NHS is doing around CORE20PLUS5 in addressing health inequalities within Lincolnshire. • Depression is increasing in our rural communities, and the impact of changing our environment will only worsen this. It is well recognised that green spaces are	**2 [REP2-050]** relating to health and wellbeing impacts. • Comment STR-10 **C8.1.19 The Applicant's Responses to Written Representations Part 3 [REP2-051]** and comment 7A-027 **[REP2-050]** relating to health inequalities. • Comment 7A-032 **[REP2-050]** relating to health and wellbeing impacts on older populations. • Please refer to the response given for comment 7A-038 of **[REP2-050]** relating to ONS data. • Comment 7A-036 **[REP2-050]** and comments on pg.137-138 of **C8.1.27 The Applicant's Responses to Deadline 2 Submissions [REP3-039]** relating to a Health Impact Assessment, and the scope of assessment in the ES. • Comment 7A-032 **[REP2-050]** relating to access to community facilities and healthcare.

		beneficial to mental health and wellbeing. In the 25-year environment plan, it states clearly that "the natural environment, resident or visitor, improves our mental health and feelings of wellbeing by reducing stress, fatigue, anxiety and depression". Our loss of the countryside will manifest in grief, which has a direct impact on physical and mental health. Also, it is well recognised that there is poor mental health in farming communities. In the UK there is a high suicidal rate amongst farmers, and the impact of this and these developments needs to be fully recognised as a possible impact on the farmers in the area that farm to make a living and are let down by those who have opted to place solar panels on their fields. This creates inequality between farmers and could lead to a health inequality for example, long-term mental health. • There is also a potential to impact on social care within our communities if these schemes go ahead. Younger adults tend to migrate out of the countryside for further education to the larger cities and towns, whereas older adults (some with children) tend to move in. Therefore, rural communities tend to have above average middle-aged and older people. There is a concern that if our environment is altered with these solar farms, both this scheme and the cumulative impact of others stretching from Saxilby to above Gainsborough, will have the effect to possibly drive	

		more younger people out leaving a more vulnerable older population. We have predominantly more older people living in our communities who potentially could be further socially isolated by networks breaking down. Furthermore, there is a well-recognised problem of recruitment in rural areas of health and social care workers. We already have a healthcare system that is overstretched with issues around workforce recruitment. • The qualitative data within the documents refers to ONS data from 2011 which is not satisfactory to inform a balanced view as to how these schemes make us feel emotionally, physically and mentally. • Approximately 40,000 people live in this area. They will be living in what is effectively a "solar city". I am therefore surprised that no Health Impact Assessment has been provided given the cumulative effects of all the schemes in such a concentrated area, and the impact it will have on people. This should have been carried out in partnership with Public Health and the NHS who work within our communities, and who have in-depth knowledge of the health issues that exist within this area. I would like to see this requested, and completed as a single document across all the schemes as one scheme of this magnitude. This would be key to the Environmental Impact Assessment for your	

		examination and crucial to advise the Secretary of State. Using a desktop search to assess health in my view is not satisfactory. A Health Impact Assessment would put the local health and wellbeing needs and priorities into the plan for better decision making, by putting people at the heart of the process. I therefore disagree with the applicant's assessment that they do not feel this is necessary. Splitting these schemes into chunks gives them reason for not doing so. The cumulative effect as a whole, will have grave implications on health and wellbeing for many years for those who live within it. We must recognise that people choose to live in rural areas and their surroundings should be respected. • Should a Health Impact Assessment not be carried out, this should be incorporated into a session on health if permitted as part of the examination. • There is a potential workforce of 2000 contractors for all the proposed schemes, coming into this area. To put it into context, one full time General Practitioner equivalent looks after approximately 2000 patients. Our services are already stretched to capacity. How will this be addressed and resourced? In response to Mr Gareth Phillips' closing remarks that a Health Impact Assessment has been done and is within the Chapters in the Environmental Impact	

		Statement, signposted Chapter 21. Clearly health impacts have not been addressed as demonstrated by my statement above particularly around mental health and the issues pertaining to health and wellbeing in rural communities. A major failing is the lack of detail around the operator cycle. Also, the Equality Impact assessment has not reassured me that there is a clear understanding of the consequences that these schemes will have on health inequality and those vulnerable groups who live within our community. I do not believe a desktop assessment is satisfactory in this case because of the scale, and that Lincolnshire Public Health and the local NHS need to be involved considering the large area being developed (equivalent to 3-4 airports where one average airport is 3000 acres). Clearly, not all the relevant stakeholders have been engaged in the process. The Health Impact Assessment needs to be comprehensive and in depth. Had the relevant Public Health document guidance been followed, this would have identified the major health impacts for both the examiners and the Secretary of State.	

John Robert Wilson [REP3-092]

Reference	Theme	Summary of Issue Raised	Applicant's Response

JRW-01		The whole issue of solar power and solar panel fields is still unproven, the loss of key agricultural land against the current worldwide agricultural situation needs weighing up as does the lack of solar energy produced from oct to March each year from these panels. We choose to live in the countryside not in a solar panel field	Please refer to the Applicant's response reference 7A-15 within C8.1.2 The Applicant's Responses to Relevant Representations **[REP-049]**.

Joseph Creswell [REP3-093]

Reference	Theme	Summary of Issue Raised	Applicant's Response
JC-01		Objection to The Cottam Solar Project My name is Joseph Creswell and am speaking as an individual member of the local population who lives in the district of West Lindsey. I wish to place on the public record in this open forum my objection to the Cotton Solar project along with other projects being proposed simultaneously. I am concerned that these proposed multiple solar projects will have a profoundly significant and irreversible impact on the live of all who live in and around them. More specifically I would like to take an historic perspective. 1 Evidence of panning mediocrity encouraged by centralised legislative mechanisms and the	The Applicant notes these comments.

		consequential impact on our towns villages and rural landscape Over the past 2/3 decades i have witnessed our towns and cities have been transformed to the same average range of centralised large scale retails outlets and mega warehouses supported by major industrial construction companies All of the major organisations involved are part of a wider industrial complex. These companies weald total power over our governing, legislative and planning bodies and have impacted a wide variety of local small businesses and farms who simply cannot afford to stand against their powerful scale and lobby. We are now witnessing this very same industrial approach through relaxation of planning laws in the housing sector. The current blight of medium and large scale house estates being erected on greenfield land on the edge of towns and villages across our county and the nation as a whole! Why is such practice acceptable today when it has been strongly resisted over the previous decades. And as if these are not impact enough these powerful companies through lobbying are proposing that we move our attention from the towns and village and to the surrounding farmland further accelerating destruction of our landscape which has remained a	

		constant for millennia from the the end of the last Ice Age to our Bronze Age ancestors through numerous occupations, of the Vikings, Romans and Normans. Throughout all if these generations there has been an understanding and respect of the landscape and protection of the nature environment.	
JC-02		Yet even through all these great historical events we will not have witnessed such wanton destruction of our beautiful landscape if these proposed solar projects are allowed to go ahead! This destruction will also impact our wildlife and hedgerows habitats, limiting movement and destroying habitats for deer, foxes, badgers owls and numerous small bird species dependent on hedge rows, and open landscapes. We cannot ignore the impact and consequences for our natural habitats and depend wildlife.	Please refer to **C6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment Revision A** (the 'LVIA') **[REP2-008]** specifically Table 8.21 which sets out the strategic approach to the landscape design parameters that have been adopted in the process of developing the environmental masterplan and associated landscape mitigation measures. These measures are particularly focused on the enhancement of the landscape character and visual amenity of the landscape for the following reasons: **Visual Buffers in Low-Lying Areas:** The low-lying areas between the separate Sites are effective as visual buffers on a horizontal plane. This likely helps in reducing the visual impacts of the panels. **Existing Vegetation Network:** The intermediary areas between the separate Sites boast a strong network of existing vegetation providing structural benefits to the landscape. The existing vegetation also acts as a backdrop for the panels and helps them integrate, particularly in views towards the horizon.

			Watercourse Integration: The watercourses are noted as distinct features in the landscape, and careful use of scattered tree and shrub planting helps reinforce their presence in a generous open context while setting panels back. **New Planting and Green Infrastructure:** A key policy objective is the incorporation of new planting and green infrastructure in all landscape mitigation measures. The receiving landscape is designed to allow space for such green infrastructure between areas. **Open Character and Celebration of the Landscape:** The areas between the separate Sites provide open character. Whilst this may not be a requirement in all locations, the character of these areas can be celebrated, emphasizing the importance of preserving these unique landscape qualities. **Buffering of Public Rights of Way:** Public rights of way are buffered, maintaining accessibility while minimising the impact of the panels along these routes. **Scope for extended appreciation of the landscape:** The areas between the Sites also provide scope for extended enjoyment of the landscape in these areas either through interpretation, access or exponentially. **Retaining and Enhancing Time Depth:** The time depth within the landscape involves considering historical and cultural aspects such as the setting of settlements and the views of churches. The receiving

			landscape between the Sites provides scope to preserve and enhance the time depth of the landscape.
		3 The morally questionable decision to industrialise perfectly good food production land! The question I pose, do we really want to limit our ability to produce food in these times of global instability? Some might say this is the inevitable consequence of progress, but to whose gain! I put to this forum that the gains will be for the large land owners and major industrial company seeking financial gain at the expense of our quality of life. All In the so called name of progress!	Please refer to the Applicant's response reference 7A-15 within C8.1.2 The Applicant's Responses to Relevant Representations **[REP-049]**.
JC-03		Can I finish by saying that as you have heard tonight there are may intelligent reasons why these projects should be stopped and history will be the witness of that but Im asking that we make the right decision based on wisdom in honour to our ancestors and for the sake of our future generations who are watching as we make this decision.	The Applicant notes these comments.

Mark Wardle [REP3-094]

Reference	Theme	Summary of Issue Raised	Applicant's Response

MW-01		I am a local resident and I wish to object to the Cottam project. I believe that the use of vast areas of farmland to build these massive solar developments is wrong in these days of world instability and the need for food security is imperative. Solar developments should be limited to brown field land, housing roof tops, industrial roof tops and other inventive areas as highlighted by the CPRE The destruction of hedgerows and trees used as habitat for numerous local mammalian and avian species is acceptable in today's wildlife protection laws. As a resident the thought of living in the middle of 4 massive solar developments fills me with despair and dread, the fear of losing huge areas of countryside is morally wrong, this is pure and simple mass industrialisation of of our precious countryside	Please refer to the Applicant's response reference 7A-15 within C8.1.2 The Applicant's Responses to Relevant Representations **[REP-049]**.

Michael Dover [REP3-095]

Reference	Theme	Summary of Issue Raised	Applicant's Response
MD-01		I maintain my opposition to this scheme and the other planned NSIPS in this area, and like many others, I	Food Security – The Defra Food Security Report [5] notes that biggest medium to long term risks for UK domestic

[5] United Kingdom Food Security Report 2021. Defra December 2021 https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021

		believe the cumulative impact of these projects should be considered as one huge project. This project along with the others, are not in the slightest philanthropic, there are no Lord Levers' or Rowntree's or Titus Salts concerned about the welfare of others, this is a scheme for the extraction of high profits and subsidies from consumers in return for an low output, inefficient, intermittent, energy. The more solar and wind projects there are, the higher the overall cost of subsidies and Contract for Difference, will be, thus the higher the consumer energy prices will rise. especially after the I'll advised, index linked subsidy increases announced by the Government for when solar farms are taken off line on a sunny summers day because there is excess energy produced at a time of day when only a fraction is required. We are, with the acceptance of every sprawling Solar project, weakening the nation's food security, the UK loses thousands of valuable & finite arable land. At a time when Conflict between Ukraine & Russia, two of the worlds largest wheat & grain producers, struggle after the second annual harvest since the war began, to export onto the world market and Asia this year suffered a circa 33% loss of rice crop yield, thus putting pressure on the supply of food. Since we import	food production come from climate change and environmental pressures that include soil degradation (see page 82 of the Defra Food Security Report). Land use change is not included as a risk to UK food security. The Applicant refers to its response on Curtailment as set out in **REP2-034** in response to the ExA's FWQ 1.3.5 - see page 79 and following. Government is aiming for zero-carbon operation of the UK's electricity system by 2035 in order to limit climate change and avoid the catastrophic effects of global warming. Government's view is that wind and solar are likely to make up the majority of a future zero-emission energy system and this scheme is coming forward in support of achieving Government's target.

		around 60% of the UK food supplies, the cost of imports and availability may become problematic. Solar, even in such vast arrays as these developments are notoriously inefficient, they are too diffuse, too intermittent, too dilute and along with wind generation, cannot power the nation. We and it is reliant on gas turbine generation. So much so that alongside West Burton CCGT plant B work begins on a new OCGT plant C. This to open circulation system can ramp up quickly to cover the sudden meteoritical dips in inefficient solar/wind, but being open circulation type, it is more polluting and less efficient, requires burning a much higher volume of gas per kWh. We are dismantling proven, relatively cheap, reliable and dense energy generating stations and replacing them with Solar, which is quite the opposite, and in doing so we are becoming increasingly dependant on China. China controls circa 93% of rare mineral mining & processing, much of which is used in the manufacture of solar, lithium batteries and associated equipments. Recently China controlled the export of Germanium & Gallium, two minerals vital in the production of semiconductors used in defence electronics etc.	

		China has and continues to expand exponentially it's coal fired power station capacity. China is responsible for circa 33% of world CO2 emissions, an increasing amount of which emitted in the production of renewables to be supplanted on to hitherto fertile crop producing land in the UK, this purportedly, to reduce CO2 emissions. The UK are currently emit circa 0.84% of world CO2 emissions. China is considered to be a belligerent nation, certainly politically it has been no friend of the west. Indeed several national security services have long suspected that the bristling aerial laden Chinese fishing trawlers, have been busily plotting the coordinates of off shore wind farms around UK & Europe. Yet via these developments the UK are becoming more dependent upon China than we were upon Russia. Thus weakening energy security. The nation does not require this wholesale destruction of nature, farmland, jobs, communities, and landscapes in exchange for a maybe and sometimes renewable energy sources. What is required is a national fleet of nuclear power stations offering affordable, reliable, controllable, dense and low emission energy. This will ensure food security is more achievable, energy security is achievable and physical security of sites is achievable.	

		One fear is if Solar is adapted for the planned periods of up to 60 years plus it will be too easy for successive governments to stifle investment in technology like nuclear fusion or another suitable reliable technology because we have committed to solar	
MD-01b		Other topics include but are not exhaustive:- Wildlife & Nature destruction, Mental and physical health impacts, Erosion of property values thus changing the quality care and stewardship of communities and village life, Construction impacts x3 over the project life time, Traffic impacts, x3 over project life time, Farming, and GDP loss, Noise in construction and operation Radiation levels Glare, Wind deflection and Wind noise increase, Deterioration of soils supplanted by solar panel arrays, Loss of amenity, Isolation & Breakdown of interaction of communities,	Please refer to the Applicant's response reference ECO-04 within **The Applicant's Response to Relevant Representations [REP-049]** regarding wildlife and nature impacts. Please refer to the Applicant's response to issue reference OEM-03 within **The Applicant's Response to Written Representations Part 3 [REP2-051]** regarding mental and physical health impacts. An **ES Addendum: Human Health [EX010133/EX4/C8.4.21.1]** will be submitted at Deadline 4. Please refer to the Applicant's response to issue reference STR-08 within **The Applicant's Response to Written Representations Part 3 [REP2-051]** regarding impacts on property values. The construction impacts of the Scheme are considered within each of the topic chapters of the Environmental Statement **[APP-036 to APP-057, REP-010, REP-012, REP-014, REP2-008, REP2-010]**. An assessment of the effects of the Scheme in terms of transport and traffic impacts is set out in the **C6.2.14_B**

		Lack of local employment opportunities from these schemes, Loss of traditional agricultural jobs, supply industries and service industries to the agricultural sector, Waste, there is no viable or economically affordable recycling scheme, with hopes that something will come along in the next decade or two. The probability is the UK will be left with a mountain of solar waste to dispose of and the cost will exponentially high. Increased risk of surface & ground water flooding, (a casual glance around the fields and area is evidence enough to show that this area is unsuitable for ground mounted solar projects). Which will detrimentally impact residents. I would like to thank everyone that made the effort to attend the meeting and particularly those that spoke with righteous passion in opposition, travelling through the inclement weather, via flooded roads passing the waterlogged fields that are proposed to have ground mounted solar fitted. I say this with genuine sincerity, unlike the the applicants legal advisor who opened his comments in a condescending and disingenuous manner	**ES Chapter 14: Transport and Access [EN010133/EX4/C6.3.14.1_B]**. Please refer to the Applicant's response to issue reference STR-02 and STR-09 within **The Applicant's Response to Written Representations Part 3 [REP2-051]** regarding impacts on economy and farming. Please refer to the Applicant's response reference OEM-07 within **The Applicant's Response to Relevant Representations [REP-049]**, and CPa-05 in **C8.1.5 Written Summary of the Applicants Oral Submissions at the Issue Specific Hearing 1 [REP-051]** regarding radiation and EMF. Please refer to the Applicant's response to issue reference GG-01 within **The Applicant's Response to Written Representations Part 3 [REP2-051]** regarding glint and glare impacts. Noise impacts have been assessed in **ES Chapter 15 : Noise and vibration [APP-050]**. As per Paragraph 19.9.1 of the ES **[REP-010]** development of the site will not result in the loss or degradation of agricultural land. Please refer to the Applicant's response to issue reference LAN-06 within **The Applicant's Response to Written Representations Part 3[REP2-051]** regarding residential amenity impacts.

			The Applicant does not anticipate for the Scheme to have a direct impact on community connectivity, accessibility, or interaction. No significant effects on transport networks as a result of driver delay or impacts on public rights of way have been assessed in **C6.2.14 ES Chapter 14 Transport and Access [APP-049]**. Please refer to the Applicant's response to issue reference STR-09 within **The Applicant's Response to Written Representations Part 3 [REP2-051]** regarding employment opportunities and impacts. Please refer to the Applicant's response to issue reference STR-01 within **The Applicant's Response to Written Representations Part 3[REP2-051]** regarding agricultural employment impacts. Please refer to the Applicant's response to issue reference WAS-04 within **The Applicant's Response to Written Representations Part 3 [REP2-051]** and to the response to Question 1.13.5 of **C8.1.15 Applicant Response to ExA First Written Questions [REP2-034]** regarding waste and recycling. Please refer to the Applicant's response to issue reference EP2-077 and REP2-078 within **The Applicant's Response to Written Representations Part 3 [REP2-051]** regarding Flood Risk.

MD-02		I would further like to comment on the statements made by Gareth Phillips, a partner of the legal firm representing all the projects. His comments on political advice given by our representatives, mainly Sir Edward Leigh, are in all probability, inaccurate, Sir Edward Leigh has never, to my knowledge, given advice on the the subject of Solar projects, he has listened however to the varied and valid concerns of those that live within the ward that he is our elected Member of Parliament . He has raised these concerns in parliament, he has also, along with the MP representative of the ward where the Mallard Pass Solar project is located, held a members debate in Westminster Hall on the subject of huge and numerous solar schemes on agricultural land. He may well be a member of HM Government, however he and other MP's, may and often do, think differently and express opposition to departmental policies, these may well coincide with the fears of the electorate he represents. One would excused to thinking that Mr. Phillips harbours a dislike of Sir Edward Leigh. I maintain that this scheme, along with the others is financially motivated, despite Mr Phillips' insincere claim that he, the applicants the solar industry. are deeply passionate about decarbonisation and not the obscene profits that can be made at the expense of,	The Applicant notes these comments, and refers the party to the Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2 **[REP3-037]**.

		not only the residents of the desecrated landscapes, destruction of communities, wildlife, jobs, mental & physical health, but also every consumer via inflated Contract for difference, subsidies and a high level arbitrage from BESS. Mr. Phillips is a partner in a law firm that has profited greatly within renewables sector, in fact I believe 2022/2023, his firm boasted a massive 14% increase in turnover boosting their annual turnover to £605.9 Million (this is set to increase substantially for 23/24) much of which has been made within the renewables sector, which means it will add to the LCOE to be paid by consumers. It is very much about the money. His decarbonisation passion are seemingly insincere, China uses coal burning power plants for the energy required to manufacture solar wafers & panels, these power plants emit a huge amount of CO2 along with noxious and polluting emissions, the fossil fuelled Chinese controlled mining sectors are on a huge and destructive scale emitting more CO2, it is responsible for desecration of huge swathes natural landscapes, toxic tailing dumps, toxic brine lakes that leach poisons into ground, rendering it contaminated for hundreds of years. These are global emissions and we cannot halt the exponential increase of CO2 by purchasing the millions upon millions more of the very goods, the	

		manufacturing, processing, mining and shipping of which, causes such emissions & toxic wastes in the first place. His comments on Lincolnshire not being the country's breadbasket but a powerhouse instead are at the very least misleading, yes there are power stations mainly in North Lincolnshire (a different county and mainly industrial) as with the power stations in Nottinghamshire and the ones in South Yorkshire. Lincolnshire is proudly known as the breadbasket of the country, and it will remain so, not withstanding the onslaught of inefficient solar development. Mr Phillips said there was no rash rush to push for a change of terminology from Important to critical, that may well be true, but there has been an exercise in attrition and fortuitous changes in governmental appointees.He went on to stating there was no lobbying of parliament, a simple search engine enquiry shows, that indeed there are a small army of lobbyists pestering on behalf of the solar industry. It also mentions the celebrations when the change of terminology was announced. He mentioned that the county council could not interfere with things like soil classification. I suspect he doesn't want the fact that 3b classified soils have year after year and in particular in dry summers out	

		performed 1, 2, & 3 classified soils by way of yield. The countryside is under assault by many types of developers, housing, roads, solar, wind, factories, warehouses, each one citing the critical importance, each one consuming farmland each one altering communities each one leaving unfulfilled promises. I cannot comment on DEFRA, if indeed as Mr Phillips says they are unconcerned with the amount of farmland disappearing un intermittent solar panels, solar and thus unconcerned with food security, I cannot find that statement. If it was made it is exceedingly a short sighted view given the fragility of global politics, food supply, pricing, conflict, and worldwide extreme weather, all of which are as unreliable solar. Golf courses. The usual default of solar farm bigots is to attack the number of golf courses. I am not a golfer, however I would prefer to gaze upon a vista of a golf course than the depressing sight of a solar panel dessert. Golf courses offer a level of recreation, exercise, social cohesion, physical and mental well-being, Solar imposes just the opposite. Golf courses offer an oasis for wildlife, fauna and fauna bio diversity, together with areas of natural carbon capture. Solar farms offer nature destruction along with empty	

		promises that they can perhaps build / invent a new ecology. Enclose this screen shot from Pinsent & Mason website earlier this year which seems to indicate that they are(albeit the total sites have now multiplied) working in collaboration and the sites should in fact be treated as one huge site in terms of impact and cumulative effect on the greater area and near townships.	

P A Mitchell [REP3-097]

Reference	Theme	Summary of Issue Raised	Applicant's Response
PAM-01		I concur fully with Interested Parties (IPs) attending this Open Floor Hearing who spoke so compellingly against the Cottam Solar Project and the cumulative effects of Gate Burton, West Burton and Tillbridge Solar projects. I support fully the relevant/written representations/summaries submitted by IPs to the Examining Authority who oppose, challenge and question the Applicant's examination documents and the Applicants 'experts' for this solar scheme including Lincolnshire County Council, West Lindsey District Council, 7000 Acres, Mr R Clegg etc. Disappointed that Mr Gareth Phillips, Solicitor for the Applicant, Island Green Power, in his representation towards the end of the above Hearing (part 2) found it	The Applicant notes these comments and refers the party to the Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2 **[REP3-037]**. Please refer to the response given for comment GEN-08 of **C8.1.19 The Applicant's Responses to Written Representations Part 3 [REP2-051]** regarding safeguarding within the supply chain. China is a major exporter of manufactured goods globally, and should not be excluded before the procurement process has begun. The Scheme will not result in loss of the agricultural land resource. Furthermore the land will remain available for grazing by livestock throughout the

		necessary to criticise/disparage Sir Edward Leigh's representation given at the beginning of this Hearing. As Sir Edward had left the meeting earlier he was unable to comment on or challenge Mr Phillips claims. I believe the derision of Sir Edward by Mr Phillips in Sir Edward Leigh's absence did not help the Applicant's case and in so doing Mr Phillip's judgement in fact was flawed. Political party membership does not mean one has to agree with all party policy. I wish to draw the Planning Inspectorate's attention to the inaccurate 'evidence' statement made by Mr Phillips at this Hearing. It is staggering that Mr Phillips, at this current stage in the examination process, should make a factually incorrect statement in his representation when, in further disparaging Sir Edward Leigh's reference to Lincolnshire being known as the bread basket of the Country, Mr Phillips sets out to negate this by stating "the evidence all around you is that this part of the world, this part of the country, Lincolnshire, has always been a power base - lots of cooling towers give that game away so whilst yes, there has been a history of agriculture and food production in the county and in the region, there has also been a significant history of power production in Lincolnshire and so what is now proposed in terms of the solar	operational period, and soil health will benefit from the fallow land management. There will be no "waste" of agricultural land resulting from the Scheme. Please see previous responses to BF-01, JJS-02, JJS-05 and MD-01.

		project and any others that come along in the same areas is in keeping with that historic use of this part of the country". Cottam Power Station and Wes t Burton Power Station to which Mr Phillips was referring are in Nottinghamshire NOT Lincolnshire ! This indicates Mr Phillips has little or no knowledge of Lincolns hire, its people, its his tory and does n't care. These chimneys are Landmarks on the horizon, they do not dominate the landscape / agricultural land as would 10,000 acres of 7,000,000 ground mounted solar panels and all the associated hardware and paraphernalia that comes with industrial scale solar projects of the nature of Cottam Solar. I disagree with the Applicant's solicitor, Mr Phillips, in his illustration of the percentage amount of land that would be used for ground mounted solar in the UK compared to the amount of land use referred to in the following two paragraphs:- The set aside land referred to by Mr Phillips as an example of farmland being taken out of agricultural use, is in fact serving nature, it creates habitat for wildlife, insects and other flora and fauna as does re-wilding and is also aiding decarbonisation. This is helping to reinstate the balance of the very threatened decreasing wildlife and will be beneficial to bio-diversity and the farmer. It will provide vital resources for	Please refer to the Applicant's response that deals with impacts on landscape character as set out within LCC questions LCC 7.11, LCC 7.14 and LCC 7.18 and question WLDC 7.1.1 of the Applicant's Response to Local Impact Reports November 2023 **[EN010133/EX2/C8.1.16]**. Please refer to the Applicant's response that deals with matters of impacts on landscape character as set out within LCC ExA question 1.4.6 of the **Applicant's Response to Deadline 2 Submissions December 2023 [REP3-039]**. Please refer to the Applicant's Statement of Need [APP-350] which, at Table 7.1, compares the annual energy yield per hectare for different technologies and at Figure 10.2 shows how solar panel efficiency has increased, now supporting the fact that solar is the leading low-cost generation technology in the UK, as supported by Figures 10.3 and 10.4 of the same Statement of Need. Section 7.5 of C7.11 Statement of Need describes the high-level factors which feed into site selection and site

		mammals, birds and other species by acting as wildlife corridors allowing species to move between isolated habitats and harbours beneficial insects that predate crops pests. Such natural landscape is beneficial for mental health and in turn physical health to the communities in those areas. Further Mr Phillips comments and comparison on the amount of land taken up by golf courses does not hold water. Golf courses are green spaces, they are outdoor recreational areas, good for people's health and well-being the benefits from playing golf are already well documented and research shows that it can deliver social value and contributes towards making people happier throughout their lives. Golf's contribution to the economy is significant running into £billions annually and this continues to rise providing jobs across the whole industry of golf, accommodation and tourism, industries and construction and real estate industries. These green spaces are kind to the eye and further are contributing to providing habitat for wildlife. Many golf courses will be home to protected species such as birds, bats, newts, snakes, insects, mammals and plants. Referencing Mr Phillips use of land for different schemes/leisure activities on page 1 of this submission I consider the Cottam 1 Solar scheme site is a wasteful	design, especially Paragraphs 7.5.10 – 7.5.12 relating to single or connected parcels of land. In response to the construction traffic points, please refer to the Applicant's response with WLDC question - 11 **6.2.14 ES Chapter 14: Transport and Access [APP-052]** and **8.4.14.1 ES Addendum Chapter 14: Transport and Access [REP1-074]** conclude that there are not expected to be any significant effects in relation to Transport and Access as a result of the construction of the Scheme. Construction traffic impacts will be managed through the **Outline Construction Traffic Management Plan [EN010132/EX4/WB6.3.14.2_E]** which is secured through requirement 15 of the draft Development Consent Order **[EN010132/EX4/WB3.2_F]** . The **Construction Traffic Management Plan [EN010132/EX4/WB6.3.14.2_E]** sets out that there is the potential for a joint CTMP post-consent once further details in relation to Gate Burton and Cottam are known. Table 2.2: PDL Sites from Brownfield Registers of Bassetlaw and West Lindsey within **Appendix 5.1: Site Selection Assessment [APP-067]** sets out all the brownfield sites that were considered within the search area during site selection process and why these were discontinued.

		use of agricultural land. It is not of good design being fragmented over a wide area which I fear will cause even more injurious destruction to the farmland both on and surrounding these fragments during construction, the increased traffic disruption to the narrow lanes accessing these separate parcels, the PRoWs (public footpaths) removal of hedgerows and trees, damage to flora and fauna, bio-diversity, wildlife and the communities that this scheme will affect as opposed to a well-designed and well thought out scheme. What is the purpose of such fragmentation on this scale ? Is it related to the extensive flooding which occurs on this farmland ? Mr Phillips further illustrated products manufactured in China that could / will have been purchased by IPs attending the meeting yet he says they are critical of using 'slave' labour in the solar panel production in that country. I feel It is unfortunate that China dominates the consumer goods market which leaves many people with little choice or option to purchase from elsewhere. I avoid purchasing goods made in China. Further and equally important products/goods manufactured in China are adding hugely to the carbon footprint not only in manufacturing using coal fired power stations but also in transporting them 4,813 miles to the UK.	

		I felt Mr Phillips was somewhat patronising towards the residents present at the Hearing in his closing comments. Along with solar panels on the roofs of houses, commercial buildings, factories, hospitals, car parks and brownfield sites there is the capacity for floating solar which has been growing exponentially, being one of the fastest-growing power generation technologies. The greatest advantage of floating solar and rooftop solar is that it avoids land acquisition and site preparation issues associated with traditional solar installations. It opens new horizons to scale up solar power, particularly in countries with land constraints, including the UK, a tiny island with finite land resources and an ever increasing population. Floating solar can produce a higher energy yield due to the cooling effect of water, the costs over time of floating solar are at par with traditional solar PV. Floating solar offers significant opportunities for the expansion of solar energy capacity and should not be dismissed as an opportunity for the UK which, surrounded by water, is an ideal vehicle for this. In agricultural reservoirs, the solar panels can reduce evaporation, improve water quality, and serve as an energy source for pumping and irrigation.	

		Why has Island Green Power not considered floating solar as a way forward as other European countries are proceeding along this route ? We are not the Sahara, we are not the one million square kilometres of scorched earth in Australia. While building PV plants with high efficiency around the world due to the high intensity of solar radiation in those regions, which could supply the Mediterranean area, North Africa, and Europe with electricity, the UK is a temperate climate that will not be able to produce energy from solar power when needed most in the winter months and which confirms the huge amount of land space, at least 40-50 times more than coal plants and 90-100 times more than gas, makes ground mounted solar in the UK inefficient. Differences in geographic location have a direct impact on the intensity of solar radiation in addition to changes in wind speed, humidity, dust, and air pollution deposits on the PV panel. Each of these variables cause low productivity and performance fluctuation in PV. It is important that any solar expansion in the UK does not take away good quality farmland. BROWNFIELD SITES: We are constantly told by the Applicants representatives that brownfield sites were considered for these projects yet despite having asked Cottam,	

		West Burton and Gate Burton solar projects we have no knowledge of where these sites were, who they approached and why they were unsuitable or ruled out. Can the Planning Inspectorate please request details from the Applicants of all the Brownfield sites that were seen prior to their consultation process, including providing documentation which confirms the reasons for these brownfield sites having been rejected by them ?	

Councillor Richard Butroid [REP3-098]

Reference	Theme	Summary of Issue Raised	Applicant's Response
RB-01		Cllr Richard Butroid submitted to ExA the agenda and papers for the meeting of the Lincolnshire County Council Executive held on 5 December 2023	The Applicant notes this submission.

Roy Clegg [REP3-099]

Reference	Theme	Summary of Issue Raised	Applicant's Response
RC-01		ExQ 1.13.20 to the Applicant *With regard to paragraph 11.8.2 of ES Chapter 11: Ground Conditions [APP046] and Contamination, please clarify*	As outlined in the revised Outline Battery Storage Safety Management Plan **[REP3-018]**, in order to determine the volume storage of external water supplies for firefighting, NFCC guidance has been used

		how potential leakage from fire water storage will be mitigated in order to prevent ground contamination. The Applicants response identifies shortcomings in the submissions made. At this stage, it should be possible to confirm that the applicant will build their own water supply, provide tanks or supplementary water supplies on site. Any of these options will affect the infrastructure on the site and should have been determined by the applicant by now. Cases of fires in solar projects are now becoming common place and some have been identified in the WR's. Below is a response that should also be noted. Guidance suggests that There are many questions raised in the WR'S submissions which have been unanswered by the Applicant: Will the self-actuating automatic valves be able to detect contaminated fire runoff water and rainwater and then divert either to an appropriate channel? How will the runoff water be contained, tested /treated and discharged to the SuDS? If the water storage tanks, are already full how will the contaminated fire water, be disposed of? If a fire occurs in a battery, will the site be shut down or shut down until such time as the contaminated water	at the indicative design stage which states provisional firefighting supplies "should be capable of delivering no less than 1,900 litres per minute for at least 2 hours." Lincolnshire Fire & Rescue Service (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. A BESS design which may require direct LFR firefighting engagement tactics will not be selected for this facility. The actual site supply requirement will be decided at the detailed design stage. On top of this supply requirement of 20% to 30% additional capacity should be allowed for storage in the water run-off retention facility (legislation requires 10%). The proposed additional capacity allows for potential increases to rainfall volume from climate change and reduces BESS fire water run-off pollution concerns from a fire. At the detailed design stage, a fire water management plan will be produced to include the containment, monitoring, and disposal of contaminated fire water. Infrastructure shall be provided for the containment and management of contaminated fire water runoff from the BESS. This can include bunding, sumps, and purpose-built impervious retention facilities. All process water used in the system shall be prevented from contaminating potable water sources in accordance with local regulations through the use of

		has been filtered and disposed of to ensure that a further fire can be satisfactorily and safely dealt with? In the event of a fire and shut down of the solar farm will the developer be confident of continuing and is there a risk of failure and closure of the solar farm permanently?	check valves or other means as part of the system design. Site and BESS design principles and ERP content will ensure that the FRS are expected to employ a defensive strategy i.e., only boundary cooling should be employed for cooling of adjacent BESS or associated supporting equipment. Water storage tanks designed to be used for firefighting will be located at least 10m away from any BESS enclosure. They must be clearly marked with appropriate signage. They will be easily accessible to LFR vehicles and their siting should be considered as part of a risk assessed approach that considers potential fire development/impacts. Outlets and connections should be agreed with LFR. Any outlets and hard suction points should be protected from mechanical damage (e.g., through use of bollards). The specific firefighting water runoff drainage and water capture design and locations will be finalised at the detailed design stage when the volume of water required is agreed with LFR. The design will allow for easy pollution analysis and the firefighting water can be tankered off site if polluted. Trapped water (if not polluted) may be reused as a potential source of firefighting water. This follows the management plan process as detailed in 'Protocol for

			the disposal of contaminated water and associated wastes at incidents 2018'. The revised OBSSMP commits to the following comprehensive safety audits at the detailed design stage. These consider the lifecycle of the battery system from installation to decommissioning. Risk assessment tools will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. At the detailed design stage, a post-incident recovery plan shall be developed, as recommended by the NFCC guidance that addresses the potential for reignition of BESS battery systems, as well as removal and disposal of damaged equipment. A fire watch will be present until all potentially damaged BESS equipment batteries are removed from the area following a fire event. The water supply for suppression systems and / or firefighting will be replenished as quickly as feasible. This plan will be formulated to minimise operational disruption and downtime and be approved by LFR.
RC-02		ExQ 1.13.31 to the Applicant *Please explain why paragraph 21.2.8 of ES Chapter 21: Other Environmental Matters [APP-056] considers that the transient use of Public Rights of Way crossing three 400kV circuits does not require any further investigation to*	Please refer to the Applicant's response to Action Point 2 within **Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 3 and Responses to Action Points [REP3-034]**.

		exposure. ICNIRP reference levels in particular, would be exceeded (paragraph 21.2.7). Please refer to ICNIRP guidance, as appropriate. The developer has chosen to comment on human life and has not made any consideration of the significant impact of EMF on marine life, flora and fauna with wildlife, and biodiversity, where all the later are intrinsically linked to each other. A myriad of cable runs in the project resulting in connections carrying up to 400Kv to transport electricity from the solar panels to the National Grid at Cottam Power Station using transformers, inverters etc., all of which transmit EMF's. The WR shows that the magnetic fields created on the development site will be significantly stronger, and the effect of EMF will be distanced further away by at least 7 metres. A magnetic field measuring 57.5 milligauss immediately beside a 230 kilovolt transmission line measures just 7.1 milligauss at 100 feet, and 1.8 milligauss at 200 feet, according to the World Health Organization in 2010. An Electromagnetic Field is a circular vector field that radiates out centrally from its stronger central core with a magnetic influence on moving electric charges, electric currents, and magnetic materials. The	

		electromagnetic fields will not be mitigated or stopped by covering over or burying. in effect the EMF will at its core be distanced 2.9 metres and have an effective band width across the River Trent calculated at 12 metres. The diagram, when enlarged will show the effect of EMF field strength set against underground and overhead cables and lateral core. So how do you mitigate? Revert to using overhead cable lines for water crossings and other buried large power lines on site.	
RC-03		ExQ 1.13.32 to the Applicant *Applicant: Why has the ES not considered the potential effects of electromagnetic fields on biodiversity interests, including the lamprey and therefore the potential for effects on the Humber Estuary Special Area of Conservation in this regard? Please also explain why the Information to Support a Habitats Regulations Assessment [APP-357] rules out the likelihood of significant effects, given that this document also acknowledges that this species may be found within the River Trent (paragraph 5.1.6). Your attention is directed towards the Environment Agency's WR [REP-093] in this regard.* The Impact of EMF on Marine Life, Flora and Fauna and BioDiversity are well researched, documented and	Please refer to the Applicant's response to Action Points 2 and 3 within **Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 3 and Responses to Action Points [REP3-034]**.

		detailed in the WR's submitted previously. The Water Framework Directive, the IUCN Red List, the OSPAR, the European Eel Regulations (100/2007), the Eels(England and Wales) Regulations, the Canal Rivers Trust and the Notts Biological & Geological Records Centre list threatened, endangered and protected marine species including the Allis Shad, Brook Lamprey, Bullhead, Common / European Sturgeon, Crucian Carp, Eel, River Lamprey, Sea Lamprey, Smelt, Spined Loach, Twaite Shad, White Clawed Crayfish, Brown Trout and the Atlantic Salmon all found in the Rivers Trent and Till. Many species of flora and fauna, because of unique physiologies and habitats, are sensitive to exogenous EMF in ways that surpass human reactivity, are highly variable, largely unseen, and a possible contributing factor in species extinctions. EMF has an adverse effect on orientation, migration, food finding, reproduction, mating, nest and den building, territorial maintenance, defence, vitality, longevity and survivorship itself. Wildlife loss is often unseen and undocumented until tipping points are reached. Is the Developer, Examiner and the Secretary of State satisfied that there is no risk to any protected species from the effect of EMF and its features because of this and other similar Project?	
RC-04		ExQ 1.13.41 to the Applicant	As clarified in the updated Outline Battery Storage Safety Plan (OBSSMP) **[REP3-018]**, a generic system now used for indicative planning purposes is a 750

		Paragraph 1.1.7 of the Outline Battery Storage Safety Management Plan [APP348] states that the LeBlock modular battery system by LeClanché has been used for assessment. Please provide the following information for this battery type: • detailed Specification, Testing and Certification; • metal content in the batteries, type of wafer insulation and testing conditions, Manufacturers Warranties, specific failure rates; and the lifecycle of battery, how often it would need to be changed and the associated procedure for this. Thermal Runaway has very few means of Mitigation once started. The main concerns regarding large scale Li-ion BESS are: The potential for failure in a single cell (out of millions) to propagate to neighbouring cells by the process known as "thermal runaway". Believed to be initiated by lithium metal dendrites growing internally to the cell, a cell may simply discharge internally releasing its stored energy as heat. Even sound Li-ion cells will spontaneously discharge internally if heated to temperatures which can be as low as 150 °C, releasing their stored electrical energy, thus overheating neighbouring cells and so on. Temperatures sufficient to melt aluminium (660 °C) at least have been inferred from analyses of such thermal runaway accidents.	KWh BESS "cabinet" system integrating two battery racks, this is a designation used by several BESS Original Equipment Manufacturers. The BESS design, technology and system chemistry type is still to be determined, but it will be a lithium-ion battery system. The popular types of this chemistry for BESS systems within the lithium-ion family are Lithium Nickel Manganese Cobalt Oxide (LiNiMnCoO2) known as "NMC" or Lithium Iron Phosphate (LiFePO4) known as "LFP". The final battery chemistry will be confirmed as part of the detailed design prior to the commencement of construction. The battery system mitigation measures adopted in a final Battery Storage Safety Management Plan, will reflect the latest BESS safety codes and standards applicable at that stage. Mitigation measures will be discussed and coordinated with LFR. A Failure Modes and Effects Analysis (FMEA) of the BESS (BS EN IEC 60812) will be conducted to lay the foundation for predictive maintenance requirements and complement the fault indicator capabilities of the BMS data analytics system. Comprehensive Hazard Mitigation Analysis (HMA) will be conducted by a BESS specialist independent Fire Protection Engineer following NFPA 855 (2023) guidelines and recommendations.

		The potential for thermal runaway in one cabin propagating to a neighbouring cabin. In Arizona there were reports of "fires with 10-15 feet flame lengths that grew into 50 - 75 feet flame lengths appearing to be fed by flammable liquids coming from the cabinets". The significant volumes of water required to thoroughly cool the system in the event of a "fire", and how this water will be contained and disposed of (since this will be contaminated with highly corrosive hydrofluoric acid and, therefore, must not be allowed to drain into the surrounding environment). Thermal runaway events are uncontrollable except by cooling all parts of the structure affected – even the deepest internal parts – below 150 °C. This basically requires water, in large volumes. The lithium metal deposits will react with air moisture, causing overheating and smoke. Battery swelling, electrolyte degradation, and internal short circuits are all possible modes of failure with internal discharge and generation of locally intense heat. Because of the known thermal breakdown of even non-faulty cells, above a threshold temperature (which can be as low as 150 °C), the loss of even a single individual cell can rapidly cascade to surrounding cells, resulting in a larger scale "fire." This is "thermal runaway" in which failures propagate from cell to cell within "modules" and from module to module within a "rack".	Additional risk assessments likely to be conducted at the detailed design stage are Fire Risk Analysis (FRA), Explosion Risk Analysis (ERA), Hazard and Operability Analysis (HAZOP). BESS 3rd Party risk analysis is sometimes automatically provided by Tier one BESS manufacturers and / or BESS integrators. If the BESS system supplied differs from the specification considered for risk assessments and consequence modelling, then a full safety audit will be repeated for the new BESS system specification. These studies will be completed and signed off before construction commences. The BESS will be designed to address prevailing industry standards and good practice at a time of design and implementation. BESS system and components used to construct the facility will be certified to UL 9540 (2023) standards. As a minimum, the battery system will have completed unit or installation level UL 9540A testing, demonstrating that thermal runaway propagation will not spread between modules or between battery racks and the generation of explosive gases will not threaten container structural integrity. This offers a high level of protection against fire and explosion risk. The 5th Edition of UL 9540A should be published in 2024 and is likely to include new protocols to assess the impacts of

		The basic issue is simple: It is therefore essential to address prevention as a priority. No current engineering or industry standards require the Prevention of thermal runaway events by thermal isolation barriers. Nothing in existing standards prevents runaway incidents happening again, requiring for initiation only single-cell failures from known common defects in cell manufacture. A large BESS can pass all existing engineering design and fire safety test codes and still fail in thermal runaway – by now a well-known failure mode. This must be urgently addressed. It is critical to appreciate that all parts of the battery system must be cooled down. Playing water on a battery "fire" may cool the surface, but so long as Li-ion cells deep inside the battery remain above about 150°C, "re-ignition" events will continue. It is not sufficient to estimate water requirements on the basis of calculations assuming water reaches everywhere, uniformly. Firewater will be contaminated with, inter alia, highly corrosive Hydrofluoric Acid. Contamination of water supplies and waterways must be prevented. For example, in the recent Tesla car fire the BEV battery kept re-igniting, took 4 hours to bring under control and used 30,000 (US) gallons of water (115 m3). This was for a 100 kWh BEV battery, designed with inter-cell thermal isolation barriers.	potential deflagrations from explosive gases generated during venting thermal runaway events. NFPA 855 (2023) currently provides the most comprehensive guidelines for BESS design and site installation specifications. BESS design structural integrity will be demonstrated through full-scale fire and explosion testing or by integrating NFPA 69 (explosion prevention) and NFPA 68 (Explosion protection through deflagration venting) features. A BESS fire suppression system, if integrated by the BESS OEM, will conform to NFPA 855 (2023) guidelines, and the suppression system should be tested to UL 9540A latest standard or significant scale 3rd Party fire and explosion testing. If a BESS enclosure is a container design (20 ft, 40 ft, 53 ft), a fire suppression system will probably need to be integrated. If the BESS enclosure is a walk -in design, a fire suppression system must be installed. As best practice, fire suppression system performance should be benchmarked against free burn testing and a minimum of three suppression tests should be conducted. An independent Fire Protection Engineer specialising in BESS should review all UL 9540A test results and any additional fire and explosion test data which has been provided and validate the suppression system design. NFPA 855 (2023) confirms water is the most effective battery fire suppression agent and, therefore if a BESS Fire Suppression System (FSS) is integrated, a water-based system will be

		"Clean agent" fire suppression systems are a common fire suppression system in BESS, but are totally ineffective to stop "thermal runaway" accidents. The McMicken explosion was an object lesson in this: the installed "clean agent" system operated correctly, as designed, on detection of a hot fault in the cabin. There was no malfunction in the fire suppression system. But it was completely useless because the problem was not a conventional fuel-air fire, it was a thermal runaway event. Only water will serve in thermal runaway. Indeed in the McMicken explosion the "Novec 1230" clean agent arguably contributed to the explosion by creating a stratified atmosphere with an air/Novec 1230 mixture at the bottom and inflammable gases accumulating at the cabin top.	considered for each BESS enclosure designed to control or fully suppress a fire without the intervention of LFR. The suppression system must be capable of operating effectively in conjunction with a gas exhaust / ventilation system to minimise deflagration risks. System design and water supply requirements must be fully agreed with LFR. In order to determine the volume storage of external water supplies for firefighting, NFCC guidance will be used at the indicative design stage which states provisional firefighting supplies "should be capable of delivering no less than 1,900 litres per minute for at least 2 hours." Lincolnshire Fire & Rescue Service (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. A BESS design which may require direct LFR firefighting engagement tactics will not be selected for this facility. The actual site supply requirement will be decided at the detailed design stage. On top of this supply requirement of 20% to 30% additional capacity should be allowed for storage in the water run-off retention facility (legislation requires 10%). The proposed additional capacity allows for potential increases to rainfall volume from climate change and reduces BESS fire water run-off pollution concerns from a fire.

			Site and BESS design principles and ERP content will ensure that LFR are expected to employ a defensive strategy i.e., only boundary cooling should be employed for cooling of adjacent BESS or associated supporting equipment. Water storage tanks designed to be used for firefighting will be located at least 10m away from any BESS enclosure. They must be clearly marked with appropriate signage. They will be easily accessible to LFR vehicles, and their siting should be considered as part of a risk assessed approach that considers potential fire development/impacts. Outlets and connections should be agreed with LFR. Any outlets and hard suction points should be protected from mechanical damage (e.g., through use of bollards). The specific firefighting water runoff drainage and water capture design and locations will be finalised at the detailed design stage when the volume of water required is agreed with LFR. The design will allow for easy pollution analysis and the firefighting water can be tankered off site if polluted. The BESS enclosure will be designed to withstand overpressures generated by the battery system during thermal runaway. An explosion prevention system to NFPA 69 standards and / or explosion protection system to NFPA 68 and EN 14797 standards will be integrated. Further, the BESS enclosure will have completed UL 9540A unit and / or installation testing or

			large-scale 3rd Party Fire and Explosion testing without pressure waves occurring or shrapnel being ejected. An independent Fire Protection Engineer specialising in BESS will review all UL 9540A test results and any additional fire and explosion test data which has been provided.
RC-05		ExQ 1.13.44 to the Applicant *With regard to paragraph 1.1.12 of the Outline Battery Storage Safety Management Plan [APP348], please provide further information on how the BESS would deal with thermal runaway.* No engineering standards are currently applied to pre-empt future accidents in grid-scale BESS, the most critical of which would be design features aimed at preventing the phenomenon of "thermal runaway", the process whereby failure in single cell causes over-heating and hen propagates to neighbouring cells so long as a temperature (which can be as low as 150 °C) is maintained. The engineering standards NFPA 855, UL 1973 and UL9540/9540A. UL 9540A is a US standard that is widely used in grid-scale BESS engineering, is routinely recommended by insurance and risk consultants and was appealed to by the developer of the Cleve Hill. The problem is that UL9540A is fundamentally a test procedure. It mandates no design features. It requires absolutely nothing that would	The revised Outline Battery Storage Safety Management Plan (OBSSMP) **[REP3-018]** details the Applicant's approach to preventing and a mitigating a thermal runaway event. The Air Quality Impact Assessment of Battery Energy Storage Systems (BESS) Fire **[REP-079]** incorporates requests from the UK Health and Security Agency to determine levels of specified pollutants for a BESS fire incident. The report utilises current confidential emission data from a variety of LFP batteries and BESS systems similar to the indicative BESS design, which demonstrates that there is no significant toxic emission threat for local respondents. At the detailed design stage, the Applicant will commission site and BESS system specific consequence modelling to ensure that the BESS system selected will not emit toxic emissions that exceed the levels stated in the Air Quality Impact Assessment. A December 2023 interim report in New York State on three BESS fires involving LFP and NMC battery systems has concluded that: "Based on available

		prevent thermal runaway in any BESS design. This means that an operator can say truthfully that a given BESS is "fully compliant" with UL9540A, yet this would provide no assurances at all regarding thermal runaway prevention. It is therefore wholly insufficient as a safeguard to either the operator, the public, or to emergency services. NFPA 855 [21], uniquely, requires evaluation of thermal runaway in a single module, array or unit and recognises the need for thermal runaway protection. However, it assigns that role, with complete futility, to the Battery Management System (BMS). Thermal runaway is an electrochemical reaction which once started cannot be stopped electrically. It is uncontrollable by electronics or switchgear. A BMS can locate faults, report and trigger alarms, but it cannot stop thermal runaway. Nothing in UL 9540A addresses thermal runaway, and as a test method standard, it can provide no "safety certification" for Li-ion BESS. UL 1973 allows for the complete destruction of a BESS and the creation of an explosive atmosphere so long as no explosion or external flame is observed. An installation can do all these things but still "pass" UL 1973. At McMicken one rack was completely destroyed and an explosive atmosphere created but no flame or explosion occurred until first-responders opened the cabin door. UL 9540A is merely a test method for	analyses of air quality, soil, or water data collected in the days following the incidents, the Working Group concluded that there were no reported injuries and no harmful levels of toxins detected." The data assembled and analysed by the Working Group includes: • An air monitoring report from the Office of Fire Prevention and Control (OFPC), and soil and water sampling data received from Department of Environmental Conservation (DEC) from the Chaumont site. • On-site air monitoring results collected from the Warwick sites and relayed to the Working Group by local officials. • On-site soil sampling results from the East Hampton site relayed to the Working Group by a project developer. • An independent third-party site inspection report consisting of air monitoring and surface sampling at school buildings in the vicinity of the June 27, 2023, fire at the Warwick site. Based on the information available to date, there is no evidence of significant off-site migration of contaminants associated with the fires. In response to the comments relating to the application of COMAH the Applicant refers the party to

		generating data. It does not define any "pass/fail" criteria for interpreting results. Specifically, it does not address cell-to-cell cascading in thermal runaway, nor the evolution of a potentially explosive atmosphere. It does not even prescribe that the cellto-cell cascading rate be measured. It allows that thermal runaway may proceed to an entire rack (as at McMicken) and offers testing of fire suppression systems (which operated correctly at McMicken but cannot prevent thermal runaway, and did not prevent an explosion). Presentation of data generated under UL 9540A to an "AHJ" (Authority Having Jurisdiction) does not translate to a succinct understanding of potential risks. NFPA 855 does require evaluation of thermal runaway in a single module, array or unit and does acknowledge the need for thermal runaway protection. However, it assigns that role to the Battery Management System (BMS). Yet thermal runaway is an electrochemical reaction that once started cannot be stopped electrically. It is uncontrollable by electronics or switchgear, only by water cooling. In the case of Sunnica, the Local Authorities have suggested that water supplies of 1900 litres per minute for 2 hours (228 m3) will be needed. But this is grossly inadequate. Using the above Tesla BEV fire experience,	response reference 7A-022 in the Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 2 **[REP2-050]**.

		this amount of water would suffice for just two Tesla Model S car fires. Scaling this up to even the smallest 2 MWh BESS (such as that in McMicken, which contains stored energy equivalent to twenty Tesla Model S cars, it is clear to see that a much greater amount of water would be needed. COMAH There are growing concerns about the use of Lithium-ion batteries in large scale applications, especially as Battery Energy Storage Systems (BESS) linked to renewable energy projects and grid energy storage. These concerns arise from the simple consideration that large quantities of energy are being stored, which if released uncontrollably in fault situations could cause major damage to health, life, property and the environment. BESS are not currently regarded by HSE as regulated under the COMAH The reason the COMAH regulations should apply is the scale of evolution of toxic or inflammable gases that will arise in BESS "fires". In the Drogenbos incident (2017, Table 1), the inhabitants of Drogenbos and surrounding towns were asked to keep all windows and doors shut; 50 emergency calls were made from people with irritation of the throat and airways1. A chemical cloud which "initially had been enormous", was charted by helicopter. The Belgian Fire Services could not control what was described as "the chemical	

		reaction" and filled the cabin with water. Fears of an explosion with 20 metre flames kept people confined for an hour. Although the initial visible flames were controlled quickly, cooling continued over the next 36 hours. Applicability of the COMAH (Control of Major Accident Hazard) Regulations 2015 The governing criteria for application of the COMAH Regulations [17] are: 1. The presence of hazardous materials, or their generation, "if control of the process is lost." 2. The quantity of such hazardous materials present or that could be potentially generated. There is no doubt that hazardous substances such Hydrogen Fluoride (an Acute Toxic controlled by COMAH) would be generated in a BESS accident (i.e., in "battery fires"). Similarly highly Inflammable Gases (also controlled by COMAH) would be evolved even if the atmosphere remained oxygen -free. Depending on the size of the "establishment" these could be produced in sufficient quantities to be in the scope of COMAH.	

Simon Skelton [REP3-100]

Reference	Theme	Summary of Issue Raised	Applicant's Response

SS-01		Below. Figure 15.9: Sensitive Receptor Location Plan from the June PEIR document. What this map also shows are areas of solar panel exclusion as agreed during consultation and considers our home (R24) equally with other isolated properties in the area, such as Fillingham Grange to the East (R28) and Low Farm to the Southeast (R35 & R43). However, this is not the reflected in the final plan!	Please refer to Section 4.1 and to the Applicant's response to Action Point 2 within **Written Summary of the Applicant's Oral Submissions & Responses at Issue Compulsory Acquisition Hearing 1 [REP3-036]**. Please refer to the Applicants Responses to Examiner's Second Written Questions **[EN010133/EX4/C8.1.30]** and specifically question 2.5.4 for details of proposed early implementation of landscape mitigation.
SS-02		Hearings Firstly, I must comment on the Applicants numerous "impartial specialists" and their blatant and consistent narrative, which was that this and the other 3 solar NSIPs in the immediate area would bring significant benefits and be of no detriment to the area. This solar utopia was promoted by all without exception. I am sure these people would argue black is white! In the real world, the truth would in fact be dystopia. On a scale never seen before in this country. Selling vast industrialised areas in this way for such little gain makes me doubt some people's humanity. In fact, the stark difference in judgements has been clearly highlighted during the week's hearings. If Ground mounted solar on this scale was so fantastic, then why the overwhelming opposition? The applicant and their	The Applicant notes the comments made and refers to [ ] of the ES which sets out the qualifications of the Applicant's environmental consultants.

		allies are delusional about both impact and capabilities of this scheme.	
SS-03		ISH2. Agriculture and soils. The Applicant stated when discussing BMV classification, that the land being wet during Autumn and Winter meant that the ground could not be accessed by heavy farm machinery which would cause an untold number of soil problems including compaction and smearing, resulting in increased flooding issues etc... and cultivation would increasingly have to wait until Spring. I understand this and I have no doubt this can indeed happen. However, crops are often sown directly after the harvest and other soil types suffer similar seasonal issues of which the farmer would work around. My reply to this weak argument, is that for the exact same reasons mentioned, would the construction and maintenance work on this scheme also halt during the wetter months to safeguard the soil structure and prevent increased flood risk? The heavy and wet land in this area, as stated by the Applicant's impartial soil expert, would not be conducive to sheep welfare, areas for livestock need to be chosen carefully in this region, requiring frequent rotation. Hence this being an arable landscape, famed for growing cereals. Lincolnshire is after all "the	ALC Soil Wetness limitations take into account the autumn sowing of many crops. The **Outline Soil Management Plan [REP3-009]** includes provisions to stop work following rainfall until soil has dried to friable state (is below the plastic limit). Arable crop establishment needs to take place at specific times of year and these can coincide with extended periods of wet and plastic soil. Construction work can take place over summer when the risk of encountering a soil wetted to a plastic consistence is at its lowest. In addition construction work will take place after a green cover has been established, speeding the drying of soil following any rainfall. A year round green cover will promote rainfall infiltration when compared to arable land management with periods of bare soil erosion by raindrop impact which in turn generates surface runoff.

		Breadbasket of the UK." It is madness even to contemplate using arable land for sheep grazing. We have enough grassland on poor and free draining soils already in this country. Any meaningful agricultural practice would obviously cease at the CSP. There is no requirement for three thousand or cumulative ten thousand acres of extra sheep grazing in this area. The notion of serious sheep farming should not be given weight here and using sheep as a tool to keep the brambles at bay is not a sheep farming business. Land lost to solar here and across the country will be of catastrophic proportions, solar plants are not an appropriate use of land. The 3a BMV threshold is stated in planning policy and is given serious consideration but so is Brownfield site use and this seems to be given little consideration? High quality 3b land is being ridden over roughshod. The loss of any arable land puts undeniable pressure on what remains. With around half the UK's agricultural land located on flood plains which may be lost to permanent or intermittent flooding either by extreme weather events or by rising sea levels. It seems hypocritical to be wasting good farmland on solar and at the same time exacerbating local flooding issues with solar panels covering the size of a city. The solar panels would be like a metropolis of un-guttered rooftops with the	

		concentrated rainwater falling straight to the ground. The flash flood risk would be compounded many times over. Claiming that after 60 years the land could return to agriculture is nonsense. I doubt after six decades there will be a renewed need for agriculture. This will be classed as previously developed land with a Grid connection. I think we all know this land will be used for industry in perpetuity, in essence a very large brownfield site. Another comment made by the Applicant about the solar scheme's land returning to agriculture, whereas land used for housing could not. My issue with this statement is that affordable housing is a national requirement, but 3000 acres of solar panels generating an unreliable and tiny amount of electricity is not!	
SS-04		Landscape and Visual. The Applicant bizarrely stated that the landscape would be enhanced by the mitigation measures and not one property would be negatively impacted by solar apparatus after year 15. I can tell you and hopefully you will have seen, even with the best growing conditions and no planting failures this would not be the case in this landscape.	The approach to the identification of significant beneficial effects on landscape character is set out within the Written Summary of the **Applicant's Oral Submissions & Responses at Issue Specific Hearing 2 and Responses to Action Points [REP3-033].** Please refer to Appendix 1 of this document, which sets out how the conclusions on beneficial effects within the LVIA are guided by five key factors or baseline considerations: 1. Landscape value

		My home would be thoroughly degraded by the current proposal and all that have visited are horrified by the scale of the plans and agree. The sloping nature of the land surrounding us would require hedges of up to 10 metres in height. This would never happen in my lifetime and the character of the area would be unsympathetically changed. Today we had the Applicant saying significant benefits and the Council's specialist across the floor saying significant harms! Which one is in the real world? No amount of billowing hedges or saplings planted could counter over a million 15 foot high solar panels. It is a ridiculous argument. Visual impact would clearly be immense and should be of utmost concern on a land use change of this magnitude. I do not think waiting 15 years for mitigation is acceptable either. If this period is required it surely shows poor site selection and design. The 4.5m panels are not helpful in this process, covering such vast areas of the countryside will be impossible to screen and the visual impact significant and increasing during the Winter when foliage is lost. A fundamental concern is that due to increasing numbers of browsing animals in the area, saplings would not stand a chance. I have hands on experience of 20 years trying to establish hedgerows and scrubland here. Unless the area has	2. The context of EN-5 3. Use of GLVIA3 4. Professional opinion and experience in delivering large scale infrastructure projects; and 5. Published landscape character assessments. The Applicant has provided a further update on the identification of significant beneficial effects on landscape character since it was requested that LCC and the Applicant provide a joint statement regarding the weighting of the significance of the positive impacts of mitigation on landscape. Two meetings were held on Thursday 4th January and Monday 15th January 2024 with Lincolnshire CC at which these matters were discussed. **C6.2.8 ES Chapter 8: Landscape and Visual Impact Assessment Revision A [REP2-008]** (the 'LVIA') considers both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric of the landscape are taken into account as well as the views and visibility. The assessment includes a suite of viewpoints that cover a wide range of visual receptors, including public locations such as transport routes, PRoW and residential properties. There is no further change to this suite of viewpoints since they have been discussed and agreed with the competent authority.

		extraordinary mammal exclusion provisions, new planting with tree guards will not be a success. This must be fully considered. The Sunnica scheme in Cambridgeshire propose 2.5m/8ft high panels. 4.5m/15ft proposed for the CSP is nearly twice the size, this just cannot be allowed. The Secretary of State has recently raised concerns over the visual impact of Sunnica. The CSP would be a far more imposing scheme. I left the hearing today quite depressed. The Applicants arrogant claims that the industrialisation of our region could only enhance it, implied that we live in an unattractive and ecologically deficient area and these projects would considerably improve this. I wholeheartedly disagree and I think that the people that live here and without a financial agenda will be the true judges of that. I, for one wish to maintain this wonderful natural and productive semi natural agricultural landscape that I chose to live in, I do not wish to lose vast and unproportional swathes of farmland to an energy folly promoted without context and backed by Net Zero threats. 10,000 acres is the size of Lincoln and its boroughs, a criminal waste of land! The Applicant states that the solar panels shown in photomontages are worst case scenario 4.5m. They are	Year 15 is an acceptable year of assessment for setting the standard for mitigation measures and for predicting the findings of the assessment within the LVIA process. This is set out in recognised guidance' 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 4.31 that *"Mitigation measures, especially planting schemes, are not always immediately effective. Advance planting can help reduce the time between the development commencing and the planting becoming established. If such planting forms part of the scheme design it should be included in the design and access statement and in the project description. Where planting is intended to provide a visual screen for the development it may be appropriate to assess the effects for different seasons and periods of time (for example, at year 0, representing the start of the operational stage, year 5 and year 15) in order to demonstrate the contribution to reducing the adverse effects of the scheme at different stages. In such projections the assumptions made about growth rates of planting should be clearly stated."* 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

		evidently closer to 3.5m and do not represent the immense environmental impact larger panels would have. *The submission includes photographs of Willingham Road.* Sir, I hope this shows how deceptive the Applicant has been about how these photomontages represent worst case scenario… true 4.5m would be significantly worse than shown, panels of this size are not fit for the British countryside. I am sure the Applicant will continue to argue as they did in the hearing, stating worst case scenario panels are shown. This again shows disrespect for the countryside and the public and I ask for this serious issue to be addressed?	complex infrastructure projects, from major Highways schemes, to Carbon Capture, the power station development, tall buildings and solar projects across the UK. Crucially, Mike was a key technical author of the Landscape Institute's TGN 06/19 on visualisation of development proposals. He has worked alongside The National Trust, Historic England, English Heritage, RBG Kew, Historic Royal Palaces as well as NatureScot (formerly Scottish Natural Heritage) for whom he is currently working on updates to their windfarm visualisation guidance. The photomontage work undertaken for the project has followed recognised best practice 'Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) by the Landscape Institute and Institute of Environmental Management & Assessment and the Landscape Institute's guidance 'Visual Representation of Development Proposals Technical Guidance Note 06/19 (TGN 06/19)'. The photomontages produced comprise of a series of overlapping single frame 50mm photographs taken from a surveyed position using GNSS equipment to achieve a locational accuracy down to 1cm in eastings, northings and height. These overlapping images were cylindrically re-projected to ensure consistent geometry was achieved. The camera equipment used and technical methodology followed is set out within C6.3.8.15 ES Appendix 8.1.5 in detail. The survey verified photography was then matched with a geo-

			referenced accurate 3D Model built from layout data, OS MasterMap, and Environmental Agency LIDAR DTM (2m) data, with 3D point data used for checking horizontal and vertical alignment. Visualisations are presented as either AVR 0, 1, 2 or 3. The differences between each AVR are explained in the Landscape Institute's TGN 06/19. The resultant visualisations are highly accurate and therefore, the photomontages are considered to fairly demonstrate the correct positioning, scale and massing of the development in its local and wider context. Please refer to the Technical Methodology accompanying the Viewpoint Photomontages for further information [APP-069 – APP-073].
SS-05		ISH4. Cumulative effect, climate change. There is no national urgency for an extra 0.17% electrical generation from the CSP or an additional 0.15% from the West Burton, Gate Burton and the Tillbridge solar schemes. When Cottam and West Burton power stations finally closed, the UK lost 8% of its generating capacity. These contextually small amounts of solar generation are a mere drop in the ocean and therefore are of no critical importance. We cannot continue on this trajectory. The tiny contribution by these solar projects would further diminish over time due to increasing national demand and the forecast of further peak solar	With regards to the differing conclusions of cumulative assessments, each scheme has concluded significant beneficial cumulative impacts for the respective scheme in isolation. For Cottam/West Burton a cumulative beneficial cumulative effect has been identified as four solar projects being developed at the same time would result in a quicker reduction in CO_2e emissions from legacy sources than a single project alone. This approach takes into account professional judgment and interpretation of the IEMA Guidance. A more conservative approach has been taken by Gate Burton and Tillbridge and no additional cumulative beneficial effects have been identified as a result of their interpretation of the guidance. This interpretation

		curtailment. Small power outputs mean small carbon savings and long carbon payback periods. These schemes using grid connections available near the end of the decade, make them neither urgent nor part of a clear energy/land use strategy, we need more power. Mining operations exploiting the poor and the coal fired generation powering up the solar production line abroad is nothing but a backwards step for humanity and the climate. What it is, is an over simplified attempt at decarbonising the electricity sector with shortcomings furtively glossed over. The lobbyists have done their job well. I do not think climate change, the energy crisis or feeding the nation are being addressed seriously here and therefore I do not think this approach to solar development has a justifiable case, the harms caused being far greater than the benefit. With a further 56GW of installed solar capacity on the horizon (at an average 10% yield) and a blatant disregard for rooftop and brownfield site use, means that the UK would lose a further unacceptable 280,000 acres of land to these ineffective schemes and this would still only provide about 4% of our future	takes 'cumulative effects' as not possible to assess for climate change given the national rather than local scale of the impact. In light of this difference in interpretation, the SoS may decide to place limited weight on the beneficial CEA identified (albeit that there are beneficial effects for each Scheme assessed as assessed individually). Discussion between the different authors of the Climate Change Assessments for the projects to understand the approach taken. Government is aiming for zero-carbon operation of the UK's electricity system by 2035 in order to limit climate change and avoid the catastrophic effects of global warming. Government's view is that wind and solar are likely to make up the majority of a future zero-emission energy system and this scheme is coming forward in support of achieving Government's target. Chapter 5 of C7.11 Statement of Need explains that there are significant risks relating to the development of new or complicated technologies (e.g. hydrogen, carbon capture usage and storage and nuclear power) which mean that these technologies cannot be relied upon to deliver a zero-carbon electricity system in 2035 (See Paragraph 8.9.3 of C7.11 Statement of Need [APP-350]). Solar is an essential part of the proven solution to the energy trilemma and no opportunities to deliver schemes which will harness the carbon-free energy from the sun should be passed over, especially ones

		electrical needs. We will run out of land first if we follow this reckless path! The criminal land use inefficiencies of solar would hamper more important Net Zero and domestic projects that can only be realised on land. Not to mention increased imports and their associated carbon footprints. Solar plants would industrialise the UK on an unprecedented scale. Britain's exposed position in the north-east Atlantic makes it one of the best locations in the world for wind power generation, and the shallow waters of the North Sea host several important offshore wind farms yielding up to 50%. Britain, however, is not suited to ground mounted solar due to the land competition of a small island and its low solar irradiance. One size does not fit all! Lastly, to achieve this large increase of electrical generation required for the UK to decarbonise and to play its part in the climate change issue, we need to use higher yielding methods, which is likely in part to come from small Modular nuclear reactors and potentially nuclear fusion. Tying the Supergrid up with ineffective low yielding solar schemes for 60 years is shortsighted. It is clear that when looking at the bigger climate change picture, which must be done. That large scale ground mounted solar has a negative effect in	which, like this Scheme, is, if consented, capable of being operational during the 2020s. Table 7.1 of Statement of Need [APP-350] shows a comparison of annual energy yield per hectare for different technologies, including for solar and onshore wind the range from high to low generation density per technology. The conclusion drawn from this table is that the average annual energy yield per acre of land from solar is of a comparable order of magnitude as the average annual energy yield per acre of land from onshore wind; and both are significantly higher than the average energy yield from bio-crops.

		this country. I cannot seriously comment on the Applicants cumulative climate change claims compared to the other West Lindsey solar scheme's more realistic stance. I found it confusing and extremely contradictory, as many of the claims have been this week.	
SS-06		Cumulative effect, general. With 11 solar NSIPs proposals covering 26,000acres of land in this county is disproportionate, but 4 in West Lindsey alone and covering 10,000 acres is totally unreasonable on communities and on the open landscape chosen. It is the equivalent to 10 "Longfield's" within in a 10km radius! 600,000 acres could be lost to solar nationwide, as indicated on the National Grid TEC register…I realise this figure is just a potential but within this vast number of applications there will be acceptable sites and others that are just a massive land grab such as this one. Visual impact would be immense here, both from viewpoints and when moving through the area. We would be getting the largest and tallest combined solar complex forced upon us, and one that is the furthest away from any grid connection. The 4 giant solar schemes in this small part of West Lindsey would mean 15% of the farmland and therefore our countryside would be gone, and the	The Applicant notes these comments. Please see responses within this document to SS-04, SS-05, SS-10, SS-11, LCC-03, LCC05, WLDC-04 and 7A-09. Section 7.5 of C7.11 Statement of Need [APP-350] describes high-level criteria which guide site selection for large-scale solar schemes, and explains that the Scheme brought forward by the Applicant scores highly against the most important site selection criteria, and seeks to make best use of the grid connection capacity which has been made available to it. The Scheme is therefore highly viable and would help to ensure that the need for large-scale solar generation can be fulfilled. This is an important and relevant factor in the decision-making process. With regard to loss of farmland and countryside, development of a temporary solar farm does not result in a loss of farmland or countryside. Agricultural land within a solar farm development remains agricultural land. In addition to being able to resume any arable management on decommissioning, it can continue in agricultural production throughout the operational

		landscape ruined. This is the size of Lincoln and its boroughs and is unacceptable for one region. This intensive level of land and landscape loss surely cannot be justified in developments that offer such poor returns. This is surely a fundamental planning requirement on projects of this scale. 11/12 solar NSIPs in Lincolnshire. Gate Burton Energy Park Cottam Solar Project West Burton Solar Project Tillbridge Solar Project Beacon Fen Energy Park One Earth Solar Project Heckington Fen Solar Park Mallard Pass Solar Project Springwell Solar Farm Temple Oaks Renewable Energy Park Fosse Green Energy Steeple Solar, adjacent to West Burton power station in Nottinghamshire.	period, grazing sheep. Section 19.9 of ES Chapter 19 [REP-010] makes clear that there is no loss of agricultural land to development, operation and decommissioning of the proposed solar farm.
SS-07		Cumulative effect, transport. Again, I have to disagree with the Applicants statement that construction traffic for 4 schemes possibly spanning a 5-7 year period, would be of low impact! Isolated homes and country lanes have been given little consideration and this again shows unfair treatment of the rural minorities that would be affected the most. Travelling through the area during the construction period on a 10,000 acre building site would be a	The construction vehicle routes for the cumulative schemes assessed in the **C6.2.14 ES Chapter 14_Transport and Access [APP-049]** differ and there is only a small amount of overlap between the schemes. For example, HGVs associated with Cottam will use the A1500, Ingham Lane/Stow Lane, the A631 and B1205. HGVs associated with West Burton will use the A1500, A57 and B1241. The Gate Burton HGV route utilises the A156, and Tillbridge HGVs will utilise the A631. All HGVs will not be using the same route at the same time. The Gate Burton, Tillbridge, West Burton and Cottam developers are working together to minimise

		logistical nightmare and a serious safety issue on roads without footpaths.	construction impacts as detailed within **WB8.1.9_B Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision B [REP2-010].** Construction traffic impacts will be managed through the **Construction Traffic Management Plan [EN010132/EX4/WB6.3.14.2_E]** which is secured through **requirement 15 of the DCO [EN010132/EX4/WB3.1_F]**. The **Construction Traffic Management Plan [EN010132/EX4/WB6.3.14.2_E]** sets out that there is the potential for a joint CTMP post-consent once further details in relation to Gate Burton and Cottam are known.
SS-08		ISH5 Draft DCO Hedgerows. As mentioned in my WR Important Hedgerows H154 and H155 bound my property on the South and West sides, they would provide visual screening from construction traffic and ultimately the potential industrialised nature of the surroundings, if this DCO were granted. These hedges do not require inclusion into the DCO as there is no access required through them onto the proposed scheme and the verge width is adequate to accommodate wide loads. The access track to our property only has hedging on one side, so there is also	Please refer to the Applicant's response to Action Point 3 within **Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 5 and Responses to Action Points [REP3-038]**.

		ample space here. The inclusion of these Important Hedgerows in the plans is granting unnecessary powers to the Developer that would cause further harms to our lives and the environment. Knowing that hedges may be tampered with before any alternative steps are taken is just part of a lazy "carte blanche" approach to listing all hedgerows. I ask for hedges H154 and H155 to be removed?	
SS-09		Summary. This week's hearings were frustrating, with the constant false narrative of urgency, improvement, and significant benefit from start to finish from an army of "specialists" trying to distort the planning balance in their favour at every opportunity, on every topic and at every level. I believe the case being made by the local communities against this solar scheme is a compelling one and the case made by the Applicant is not! Firstly, the need to decarbonise the electricity generation sector and ultimately the whole of the UK is fully understood, but this has not been addressed correctly by the Applicant, yet it forms the basis of their "statement of need". With the UKs annual electrical demand of 300 TWh, means that the estimated annual output of around 0.5 TWh for the CSP would only give a 0.17% contribution.	The Applicant refers to **C7.11 Statement of Need [APP-350]** which sets out, at Paragraph 6.3.4, a number of expert projections of GB electricity demand in 2050, These projections all anticipate an approximate doubling of GB electricity demand from recent levels, to around 600 TWh per year. Government anticipates that installed electricity generation capacity will need to increase nearly four-fold from its current levels, from entirely carbon-free sources, to meet that anticipated future level of demand, as shown in Figure 7.2 of **C7.11 Statement of Need [APP-350].** Paragraphs 3.3.7 and 8.1.1 of **C7.11 Statement of Need** explains Government's view (set out in its recent National Policy Statements for Energy, and its 2020 Energy White Paper) that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". It is not the view of Government, nor the view of the Applicant,

		With a predicted 3-4x increase of electrical demand, meaning this could increase to 1200 TWh, so the 0.17% would become a 0.04% contribution, combined with inevitable seasonal curtailment of solar, this infinitesimal amount would reduce even further. The effective generation of the CSP would be like a grain of sand on a beach that just keeps growing. This tiny amount of low carbon generation is directly proportional to its decarbonisation contribution. It is therefore clear that this is minimal and that we need higher capacity electrical generation with greater benefit and land efficiency. The Applicant may say that is why we need many more of these schemes. Indeed, they do say this, but at 2500+ acres each we would simply run out of land and still not address energy security and the daily and seasonal shortfalls of solar. These shortfalls are over simplified, solved by the promotion of batteries, but with currently only around 2GWh of BESS in the UK and only about 50GWh worldwide, means that batteries will not and cannot realistically be the answer to solar's many shortcomings. The UK alone would currently need up to 50GWh of batteries just to satisfy one hour of peak demand and around 1000GWh to provide 24hrs of backup. Batteries	that solar alone is the solution to climate change, but it is a commonly held view that solar is an essential part of that solution, and Figures 7.1 and 7.2 of C7.11 Statement of Need [APP-350] show National Grid's projections of future required solar capacity in a net-zero consistent future energy scenario. Government introduced an ambition in the British Energy Security Strategy (2022) for a five-fold increase in solar deployment by 2035 (See Paragraph 7.2.13 of **C7.11 Statement of Need [APP-350]**), an ambition which has been re-stated in its 2023 Powering Up Britain strategy, and the newly-published Revised NPS EN-1 (November 2023). Importantly, these two documents explicitly call on the development of large-scale ground mount solar as a part of the solution to climate change. Page 32 and following of the Applicant's response to FWQ 1.2.1, [REP2-034] addresses these documents. The Applicant's response to FWQ 1.3.1 (page 58 and following of the same REP2-034 is also relevant). The energy trilemma (decarbonisation, security of supply and affordability) does not have a 'silver bullet' solution and it is recognised by the Government and the sector, that the deployment of very many schemes, with a mix of different technologies, is required urgently to keep the fight against climate change alive. Chapter 5 of C7.11 Statement of Need explains that there are significant risks relating to the development

		are not the Panacea. They are, however, a totally separate entity to the PV sites and a significant cash cow for the operator. Who will be buying low and selling high. Limited batteries along with a vast and wasteful fleet of installed solar capacity on farmland, that is many times greater than its generating capacity, is more fingers crossed than a real solution. This quick and easy route is not even part of a wider strategy. It is a handicap to national aspirations. BESS should be brownfield mounted or next to the Grid, as this is where for the majority it would be charged from. The Applicant has no intentions of using/buying any brownfield land for this proposal. EDF, who are the Cottam power station site owners, replied to an email about the potential use of the 600 acre brownfield site for solar. Their head of Thermal Generation replied with. "There is still no sale agreed at Cottam and we have had no approach for land by any Solar companies." Cottam has been for sale since 2019, with an obvious power generating legacy and adjacent to the Grid connection. Surely a priority site for electricity generation? On 8 December, the House of Commons Environmental Audit Committee published a report on	of new or complicated technologies (e.g. hydrogen, carbon capture usage and storage and nuclear power) which mean that these technologies cannot be relied upon to deliver a zero-carbon electricity system in 2035 (See Paragraph 8.9.3 of **C7.11 Statement of Need [APP-350]**). Solar is an essential part of the proven solution to the energy trilemma and no opportunities to deliver schemes which will harness the carbon-free energy from the sun should be passed over, especially ones which, like this Scheme, is, if consented, capable of being operational during the 2020s. The Applicant's answer to the ExA's First Written Question 1.3.5 (submitted in **[REP2-034]** includes, at p79 of that response, details on current curtailment in the GB electricity market, and explains that curtailment of the Scheme is unlikely. The inclusion of batteries in the scheme also provide flexibility to the electricity system and support the operation of the solar farm, by storing energy when it is abundant and releasing it when it is needed. In relation to brownfield and rooftop sites, the Applicant analyses, at Paragraph 7.6.3 of **C7.11 Statement of Need [APP-350]** the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However,

		the UK's preparedness and resilience to future food supply stresses or shocks caused by climate change and biodiversity loss. The report calls on the Government to implement the following key measures: • Publish the Land Use Framework and integrate food security as a central principle. • Designate food security as a public good. • Provide more clarity on its plans for baseline metrics in food sustainability. • Publish a strategy for innovative food production technologies. This report recognises the value of UK farmland and how it must be used effectively. The land use framework is to be published later this month. The loss of between 280,000 and 600,000 acres of farmland to solar is insanity and has clearly been driven by solar lobbying of many years. Land is a valuable and finite resource and people are starting to see that solar on farmland at this scale is wrong and that land use inefficiency at this level is unsustainable. Low carbon thermal power plants of all types, together with wind turbines utilise a fraction of the land and	**C7.11 Statement of Need [APP-350]** concludes in Section 7.6, that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Paragraph 8.5.10 and Section 8.5 more generally of **C7.11 Statement of Need [APP-350]** describes and expresses agreement with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. The Applicant therefore supports Government's view that large scale solar must be deployed to meet the urgent national need for lowcarbon electricity generation. Paragraph 12.1.4 of **C7.11 Statement of Need [APP-350]** sets out the Applicant's view of the benefits the scheme brings forward, by addressing the urgent need for affordable low-carbon secure electricity supplies. In summary: • The national need for solar generation is urgent and the Scheme goes towards meeting that need • The Scheme will, if consented, connect to a critical part of the National Electricity Transmission System. Its location, and the inclusion of battery energy storage as part of the scheme, will support operation of the system and reduce the likelihood of curtailment.

		generate many times more power. This is clearly the way ahead. Loss of farmland and landscape destruction was blatantly argued as not to be an issue with this scheme. As mentioned earlier, the Applicant's delusional narrative backed up by so called professional opinion, tried to tip the planning balance in their favour at every opportunity. The negatives of utility ground mounted solar are becoming more evident by the day, there is clearly still time to change the current trajectory and offramp to rooftop for the majority of solar schemes. Key points of a compelling case to reject the Cottam Solar Project. • The electrical output and corresponding decarbonisation contribution is far too low. • The loss of so much farmland for 60 years is too high. • The effects on visual impact and landscape would be significant. • Mitigation would be ineffective and the maturation period far too long. • Mental wellbeing risk is significant. • Local opposition is extremely high.	• If consented, the Scheme will deliver ahead of other technologies which have longer construction timeframes or have potentially not yet been proven at scale, which will support decarbonisation only in future years and only if they are brought forwards. • The Scheme will deliver low-cost, low-carbon and secure electricity or UK consumers through its operational life. • Without The Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved

		• Rooftop and brownfield use has not been prioritised or seriously considered. • The BNG is purely a theoretical exercise, with no guarantee of success.	
SS-10		Finally, please also consider the 3 current solar NSIPs of Cleve Hill which covers just under 1000 acres, Little Crow covering 600 acres and Longfield covering just over 1000 acres. All 3 are on contiguous sites instead of the sprawling, fragmented and more damaging nature of this project. Their size is large but not massive and the site selection means the Grid connection point is far closer than the 20km for this scheme. I believe these to be fundamental and important differences.	Please refer to **C6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment Revision A [REP2-008]** (the 'LVIA') specifically Table 8.21 which sets out the strategic approach to the landscape design parameters that have been adopted in the process of developing the environmental masterplan and associated landscape mitigation measures. These measures are particularly suited to a series of separate sites for the following reasons. **Visual Buffers in Low-Lying Areas:** The low-lying areas between the separate Sites are effective as visual buffers on a horizontal plane. This likely helps in reducing the visual impacts of the panels. **Existing Vegetation Network:** The intermediary areas between the separate Sites boast a strong network of existing vegetation providing structural benefits to the landscape. The existing vegetation also acts as a backdrop for the panels and helps them integrate, particularly in views towards the horizon. **Watercourse Integration:** The watercourses are noted as distinct features in the landscape, and careful use of scattered tree and shrub planting helps

			reinforce their presence in a generous open context while setting panels back. **New Planting and Green Infrastructure:** A key policy objective is the incorporation of new planting and green infrastructure in all landscape mitigation measures. The receiving landscape is designed to allow space for such green infrastructure between areas. **Open Character and Celebration of the Landscape:** The areas between the separate Sites provide open character. Whilst this may not be a requirement in all locations, the character of these areas can be celebrated, emphasizing the importance of preserving these unique landscape qualities. **Buffering of Public Rights of Way:** Public rights of way are buffered, maintaining accessibility while minimising the impact of the panels along these routes. **Scope for extended appreciation of the landscape:** The areas between the Sites also provide scope for extended enjoyment of the landscape in these areas either through interpretation, access or exponentially. **Retaining and Enhancing Time Depth:** The time depth within the landscape involves considering historical and cultural aspects such as the setting of settlements and the views of churches. The receiving landscape between the Sites provides scope to preserve and enhance the time depth of the landscape

SS-11		Cottam OFH2 The Cottam Solar Projects use of a high capacity 400kv grid connection in 2029 goes against the nations need for more electricity. The use of one of the four spare connections at the Cottam Grid substation is a negative and restrictive move in the quest for more power to decarbonise the UK. The UK could require 4x more power in the coming decades. This solar project's electrical output would become a mere 'rounding up' error within these enormous figures and will do very little but selfishly displace many thousands of acres of much needed land. As mentioned before, the Cottam Solar Project would inefficiently use one of four Grid connections, by utilising only about 15% of the connection's full capacity. This would be a retrograde step that must not be understated. It is a waste of important national infrastructure at a time when generation levels need to increase at a rate never seen before. These valuable high-capacity Grid connections need to be used effectively. Nuclear energy for example would offer the large quantities of low carbon electricity we seek and would use brownfield sites or only cover a	The Applicant notes these comments and refers to responses made at 7A-06 – 7A-08 above. Government is aiming for zero-carbon operation of the UK's electricity system by 2035 in order to limit climate change and avoid the catastrophic effects of global warming. Government's view is that wind and solar are likely to make up the majority of a future zero-emission energy system and this scheme is coming forward in support of achieving Government's target. The Applicant acknowledges the long period of operation of the Cottam Power Station, demolition of which commenced in 2021. Government committed to the phase out of coal generation by September 2024, due to the high carbon content of their input fuel. Chapter 5 of C7.11 Statement of Need explains that there are significant risks relating to the development of new or complicated technologies (e.g. hydrogen, carbon capture usage and storage and nuclear power) which mean that these technologies cannot be relied upon to deliver a zero-carbon electricity system in 2035 (See Paragraph 8.9.3 of C7.11 Statement of Need [APP-350]). Carbon Capture Usage and Storage is necessary for natural gas to be burnt with net-zero atmospheric carbon emissions. Solar is an essential part of the proven solution to the energy trilemma and no opportunities to deliver

		small footprint of land. I agree with the Atomic Energy Authority's comments regarding this matter. (24GW of installed nuclear power is 3x more generation output than 70 GW of installed solar.) Promoting solar on farmland and using up all spare Grid connections is threatening the country's future ability to produce sustainable and reliable energy and food. All forecasts clearly state much more power, not less or staying about the same! Cottam power station in Nottinghamshire generated massive amounts of electricity and offered flexibility that supported the country's fluctuating demands over its 50 year life. It also employed thousands of local people and provided well paid and highly skilled jobs. It outperformed the CSP in all aspects and at all levels. We would get none of this vast output from solar nor will we get generation demand response, both of which we inevitably need. This solar plant would provide very little regarding employment. One of the many reasons why solar is promoted so readily is because it does not have the cost associated with paying local salaries. It is all for operator profit. It provides no socioeconomic benefit to the area. I take offense from consultation literature and promotion misinformation stating that the CSP would replace 30% of the generation capacity of Cottam	schemes which will harness the carbon-free energy from the sun should be passed over, especially ones which, like this Scheme, is, if consented, capable of being operational during the 2020s.

		power station. It would be a far smaller figure, at around 4% of the generation on 6x more land. The public and the nation have been deceived. I am certainly not suggesting the continued use of coal, but I object to being preached at for the urgent need for more power when low yielding solar is all that is being offered. Solar power plants engulfing vast areas of farmland really are the "Emperor's new clothes." But we see the truth and not the solar propaganda. Sir, I hope it will be demonstrated during this process the many fundamental flaws regarding this proposal. If our efforts do indeed fail and the local and national harm remain unseen, I do not think the following points are too much to ask. There must be a compromise. • I suggest that we do not create high impact 'Solar Industrialised Zones' in the UK countryside. Such as the disproportional 10,000 acres proposed in this one area. • We do not foolishly use up all the high-power Grid connections on Solar. • We do not allow unprecedented 15ft high solar panels into our landscape.	

		• We introduce fair exclusion zones around all residential property. • And that BESS, which is a totally separate entity. Shall be located safely and sensibly on brownfield sites or adjacent to the Grid connection that serves it.	
SS-12		Cottam Solar Project CAH 7th December "Our home has not been afforded the same protections that other property and settlements in the area have been given. The close proximity of solar infrastructure around our isolated farmhouse together with a landscape change dominated by a sea of industrial solar panels would undeniably blight our home on a massive scale. The quiet gated track that serves solely our property and the farmland beyond would become a busy and dangerous access road, with the privacy and security we currently enjoy lost along with it. Giant solar arrays would be located right behind our house, using our own small woodland as partial screening, towering infrastructure this close would degrade this much used amenity and become an oppressive 15 ft wall of solar panels.	The **Construction Traffic Management Plan [EN010132/EX4/WB6.3.14.2_E]** has been updated at Deadline 3 to include additional information on Site Security. Measure 'xx' in Section 7 states *"Where existing access tracks are used that also provide access to residential properties, appropriate security measures will be put in place in consultation with the relevant property owner(s)".* In addition, Measure 'xxii' states, *"A separate road condition survey will be undertaken on any private road affected by the Scheme. Any identified defects in the private road resulting from construction activities will be corrected to the reasonable satisfaction of the owner".* To ensure the safety of all road users at access points, Measure 'ix' states *"Banksmen will be provided at the Site accesses to indicate to construction traffic when it is safe for them to enter and exit the Site".* Please refer to the Applicant's response to Mr Skelton's comments at reference **REP2-107** within C8.1.27 Applicant Response to Deadline 2 Submissions **[REP3-039]** and to the Applicant's response to Action Point 2 within Written Summary of the Applicant's Oral

		To the south, the vast expanse of sloping farmland would again be dominated by 15ft high solar panels virtually as far as the eye can see. We built this house and home from scratch in 2004 using our own sweat and toil. We chose this area for its beauty; we certainly would not have chosen the centre of a vast dystopian energy folly. This was a life choice and has been a life's work for us. We are not millionaires but average people of average means. As stated before, it is one thing to have a view spoilt in one direction but quite another to be surrounded N,S,E&W and having all views spoilt. This would be the destruction of the environment we chose to live in and an overwhelming blight on our homestead. My family had taken some comfort in the fact that the Applicant had made mitigation promises. Most of these have now been broken. Our home would be undeniably ruined by this scheme. I would rather be surrounded by houses than thousands of acres of posturing and ineffective solar panels. At our lowest point we tried to sell, but when we disclosed the details of the proposed development, interest was understandably lost. We have now decided not to be driven out of our forever home!	Submissions & Responses at Compulsory Acquisition Hearing 1 and Responses to Action Points **[REP3-036].**

		There is just no need for this victimisation when the Applicant has so much land at their disposal. We should not be financially compromised by this schemes impact. We currently live in beautiful isolation… Security fencing, CCTV, floodlights, warning signs, inverter buildings and monstrous panels would all be out of place here and are not a fair trade off for what we have today. Not to mention the aggravation caused by many years of construction. There seems no compromise from the developer. All our B&B plans are now on permanent hold! This is nothing more than a land grab. I see no evidence of this land being selected on merit, more like a race to get ahead of the queue in this solar gold rush for grid connections. With solar panels an astonishing 20km from grid, the scheme clearly demonstrates poor design and associated mitigation. even the photomontages are inaccurate, and misleading. Visual impact would be immense here and after 15 years would still be significant, quite possibly the same. I have planted native hedges nearly 20 years ago and they are still only a couple of metres high. This is an unnecessary and crude proposal; it is not right for the country and certainly not right for residents. I do not see a compelling case!	

		I do not want our health and our much loved and heavily invested home ruining buy this truly insensitive proposal. Cooperation with the Applicant has up to now not worked. I expect at the very least that promises made during consultation are kept, as indicated in Map 2 of my WR, which also highlights fair solar free zones around other properties. The lack of consideration has been deplorable. The total landscape change and associated blight on our home would be impossible to live with and nobody in this room could truthfully argue anything other! Respectfully Sir, all I ask is that our home is protected as originally agreed during consultation and as indicated on the map below. *The submission reproduces a map from the Scheme's PEIR.* What this map also shows is the areas where the solar panels to the North and South should have been removed as agreed during consultation and considers our home (R24) fairly with other isolated properties in the area. This is not reflected in the final plans.	

		Our home would be the worst affected private property on this scheme. The farming estate properties have far better exclusion/buffers than us. Summary My wife and I are grateful that some of our concerns were acknowledged at the CAH and commitments made to finally address them. The primary point acknowledged was the moving back of the solar arrays in Field A4 to align with Field A3 and thus "squaring off" the land parcel (see map) and providing us with meaningful and fair mitigation for our home and much used woodland area. I also repeated my WR suggestion of possibly swapping mitigation areas around to accommodate this? I would also like to highlight again our concerns regarding the track to our home, its surface maintenance and above all security issues. We have had almost sole use of the track with its lockable roadside gate, providing peace of mind for 20 years. Having much construction, maintenance, and security traffic at any time of day would be a massive reduction of this amenity and our standard of living. Regarding the views to the South of our property which look directly over Willingham Road. These remain	

		unaddressed. In this area, the solar panels would be mounted largely on sloping land of a 15 to 20 metre elevation, with a significant zone of visual influence. This vast expanse could never be effectively mitigated. I am extremely grateful for Ms. Browning's understanding and compassion when my wife and I had a brief discussion afterwards. I would appreciate confirmation of the Applicant's commitment to accommodate. After many months of despair, it would be a real weight off our minds to know that at least we now have a sensible buffer around our home.	

Victoria White [REP3-101]

Reference	Theme	Summary of Issue Raised	Applicant's Response
VW-01		I agree with Sir Edward Leigh, Councillor Butroid and all the presentations from members of the public given on the 07Dec2023 at 17:00 against this and the other solar projects. This is another project of many. Cumulative effect of using a vast area of land 10.000 acres or more magnifies the negative impact on human and animal life displacing current valuable land use e.g farming for an inefficient energy source.	The Applicant notes these comments. Paragraph 8.9.3 of C7.11 Statement of Need [APP-350] explains that the Government's plans to decarbonise the UK power system by 2035, focus on " building a secure, home-grown energy sector that reduces reliance on fossil fuels and exposure to volatile global wholesale energy prices" and Government have repeatedly stated their conclusion that "a secure, reliable, affordable, Net Zero consistent system in 2050

		Cost is linked to gas which has to be utilised to fill the gap as solar cannot fulfill energy requirements. It is not a cheap alternative. Batteries when collecting solar energy are not developed sufficiently to cope with sporadic energy capture and discharge. California even has this problem. Compare lithium with improved flow batteries which still struggle. Contaminated land with green waste already limits land for farming. What is the back up plan for loosing farm land. Where will the food come from and at what energy and pollution costs if produced elsewhere. Repurposing land for long term inefficient energy capture by solar is displacing and creating many other problems such as destroying countryside, danger from fire and pollution in an emergency . Local authorities and local taxpayers will be picking up the bill. These projects have so many different parties making money out of this yet no one will be taking long term responsiblities. The risk of Great Britain losing more control over energy needs and production to overseas is high if these solar projects go ahead. There is a large surface area already available on building rooves not yet utilised. This is a much better	is likely to be composed predominantly of wind and solar" (e.g. Nov-23 Revised NPS EN-1, Para 3.3.20] Section 10.2 of C7.11 Statement of Need [APP-350] explains how solar reduces the traded price of electricity in the UK. This solar and storage scheme supports Government's targets to fight climate change, improve energy security and manage the affordability of energy in the UK. This scheme will, if consented, be an important part of the UK's future energy system.

		location for solar panels given the current stage of this technology. Future developments may bring better opportunities on land but not now. Incorrectly viewing solar as progression when it is not given all its issues. Recycling of these panels in 40 years or so is leaving a legacy I cannot agree with. Do not allow digression and irreversible devastation.	

Wendy Rose [REP3-102]

Reference	Theme	Summary of Issue Raised	Applicant's Response
WR-01		I do not believe the guiding principle of 'good design' for this project is being adhered to in any way. There is no consideration for the environment in which the project will be located or the residents who will have to live in a huge industrial site. There is no sensitivity to the landscape and the whole project is far too large. The rural landscape will be lost for a generation +. At a time of worrying food security issues we should not be taking any agricultural land out of food production.	**C6.2.8 ES Chapter 8 Landscape and Visual Impact Revision A [REP2-008]** (the 'LVIA') includes a full and detailed assessment that deals with both effects on the landscape itself and effects on the visual amenity of people, as well as interrelationships of these with other related topics in the ES. The LVIA process is iterative and as a result, the design of the Scheme changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process. In relation to food security, please refer to the Applicant's response reference 7A-15 within C8.1.2 The Applicant's Responses to Relevant Representations **[REP-049]**.

WR-02		Any benefits from solar panels placed on grade 3 agricultural land will just not be worth it. Solar panels should be placed on the roofs of houses, farm buildings and industrial buildings OR on brown field sites. It is clear to me that the applicant has not considered using other forms of land/building.	The Applicant refers to its response to 7A-07 above.
WR-03		I am also very concerned about the mental and physical health of residents. A vast industrial site of 10,000 acres affecting 40,000 people will be incredibly negative.	The Applicant has prepared a summary document which draws together the information on human health **[EN010133/EX4/C8.4.21.1]**. The Applicant is therefore confident in their assessment that the only significant adverse effect on health and wellbeing is as a secondary impact as a result of cumulative effects during construction on long distance recreation routes, anticipated to have a peak cumulative moderate adverse effect, specifically on the Trent Valley Way (para. 21.5.41 of **C6.2.21 ES Chapter 21_Other Environmental Matters [APP-056]**).