

# Cottam Solar Project

## Applicant's Comments on Responses to the Secretary of State's First Request for Information

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## Issue Sheet

**Report Prepared for: Cottam Solar Project Ltd.  
Decision Stage – Request for Information**

### **Applicant's Comments on Responses to the Secretary of State's First Request for Information**

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## **1. Introduction**

- 1.1.1 This report provides the Applicant's comments responses to matters raised in submissions made in response to the first Request for Information ('RfI'), dated 19 July 2024, issued by the Secretary of State ('SoS').

## 2. Applicant's Comments on Responses to the Secretary of State's First Request for Information

Para	Respondent	Request	Response	Applicant's Comment
<b>Electro-Magnetic Fields ("EMF") Impact Risk Assessment</b>				
3	Natural England	<b>Natural England</b> is invited to comment on whether it is satisfied with the methodology and conclusions of the Applicant's 'Risk Assessment of EMF Impacts on Fish' under the Appendix to the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 3 and Responses to Action Points [REP3-034].	<p>Natural England have reviewed the 'Risk Assessment of EMF Impacts to Fish' provided by the applicant. It is clear that evidence surrounding the impacts of EMF from buried cables upon migratory species such as Lamprey is limited, although the referenced research is noted.</p> <p>Overall, based on the information provided within the assessment, the proposed approach to ensure the cable is a minimum of 5m below the riverbed appears to be precautionary. Natural England consider the likelihood of a significant effect upon migratory Lamprey as a result of EMF to be low.</p> <p>Natural England would like to note, however, that whilst the 5m burial depth is considered precautionary, and is significantly greater than National Grid's reference to a typical burial depth of 1m, the rationale behind the use of a 5m</p>	<p>In its letter dated 6 August 2024 in response to the SoS's first RfI, the Applicant provided the follow clarification in relation to the rationale for the proposed minimum depth:</p> <p><i>"The proposed minimum depth for the cable of 5m below the bottom of the riverbed was agreed with the Canal and River Trust, in line with the depth agreed for the Gate Burton Energy Park, in order to prevent risk of any scour exposing cable [REP3-058]. This depth was then used for the EMF Impact Risk Assessment."</i></p>

Para	Respondent	Request	Response	Applicant's Comment
			burial depth is unclear, aside from the monitored data from 5m from the centreline of the: 'National Grid 400kV 0.9m buried cable' (2.3.2), and calculated data from the 'Gate Burton Energy Park 400kV cable at 800A'. Natural England would welcome further clarity regarding the use of a 5m burial depth to ensure a negligible impact on fish.	
<b>EMF Monitoring in Outline Operational Environment Management Plan ("oOEMP")</b>				
5	Natural England	<b>The Applicant</b> is requested to revise the oOEMP to provide for results of the surveys to also be relayed to Natural England on a regular basis for the purposes of informing best practice and assessments of EMF impacts on fish in the future. <b>Natural England</b> are invited to confirm if they are content with this request.	<p>Natural England are content with this request &amp; would welcome receipt of all monitoring data to inform best practice and assessments of EMF impacts on fish in the future.</p> <p>In addition, Natural England would welcome the opportunity to input upon the specification for the electromagnetic field monitoring strategy. The current wording of the oOEMP Table 3.3 states that 'The programme [of EMF monitoring] must be approved by the Environment Agency'. Natural England would welcome amendment here to also include requirement for consultation with Natural England.</p>	<p>Natural England kindly provided the Applicant with the text of its response in advance of the deadline.</p> <p>The Applicant had therefore already added a requirement for Natural England to be consulted on the monitoring programme within Table 3.3, at page 11, of the oOEMP [EN010133/DEC/C7.16_E] submitted on 6 August 2024.</p>

Para	Respondent	Request	Response	Applicant's Comment
<b>Protective Provisions</b>				
14	National Grid Electricity Transmission	<b>NGET, Northern Powergrid, NGET (East Midlands) PLC, Network Rail, EDF, and Uniper</b> are asked to provide updates on their respective protective provisions for inclusion in the DCO and whether these have been officially agreed with the Applicant.	The Promoter and NGET have now reached an agreed position in respect of protective provisions to be included in the DCO and an associated side agreement which provides satisfactory protection to NGET's apparatus and interests. We understand that the Promoter will send over the agreed protective provisions in their response later today. The Side Agreement has now been issued for execution by the parties and once this has been completed, NGET will be in a position to withdraw its objection.	The agreed protective provisions were included in Appendix A to the Applicant's letter dated 6 August 2024 in response to the SoS's first RfI.  The Applicant has signed its part of the Side Agreement and is waiting for NGET to confirm it is ready to complete.
14	Network Rail Infrastructure Limited	As above	[...] we (on behalf of NRIL) have been in continuous negotiations with Cottam Solar Project since the Examination concluded. Currently, negotiations regarding Protective Provisions are still underway. The parties are nearing the finalisation of a confidential agreement that will ensure the inclusion of the necessary protective provisions for NRIL in any resulting order. The PPs are close to being agreed and we are hopeful that	The agreed protective provisions were included in Appendix A to the Applicant's letter dated 6 August 2024 in response to the SoS's first RfI.  Discussions relating to the side agreement are ongoing.

Para	Respondent	Request	Response	Applicant's Comment
			these will be in an agreed form within the next few weeks.	
14	EDF Energy	As above	<p>EDF continues to negotiate with the Applicant; however, as of 6 August 2024, no Voluntary Land Agreement has been agreed, and the Applicant has not yet been able to provide the reassurance that EDF requires to ensure there will be no serious detriment to its undertaking in lieu of such Agreement.</p> <p>It therefore remains EDF's position that its preferred protective provisions submitted at Deadline 6 (REP6-013), which restrict the usage of compulsory acquisition powers without an agreement, must be included in the DCO. If the DCO were granted without such wording, this would result in a serious detriment to EDF's undertaking. Accordingly, EDF maintains its objection.</p>	The Applicant refers its letter dated 6 August 2024 in response to the SoS's first RfI which sets out the Applicant's position.



Thorpe in Fallows Scheduled Monument				
16	Historic England	<p><b>The Applicant</b> is requested to revise the design of the Proposed Development to remove solar arrays on land between the Thorpe in Fallows Scheduled Monument (1016978) and the former historic east-west boundary recorded on the 1886 25-inch Ordnance Survey map, approximately along the line of grid points: SK90976 80920, SK91149 80944, SK91330 80904 and SK91351 80909. The former historic east-west boundary must also be reinstated as a hedgerow with the inclusion of appropriate native tree species. <b>Historic England</b> and <b>West Lindsey District Council</b> are invited to confirm if they are content with this request.</p>	<p>We are content with this request and can confirm it addresses our advice and concerns as government's advisor in relation to the setting of the scheduled monument.</p> <p>The applicant has shared with us drawing references Ref: P2981_LPR_ZZ_ON_DR_Z_0064 / Revision D / Sheets 12/20 and 13/20 dated 23/07/2024 which we are content set out the revision as described above.</p>	<p>The drawing referred to by Historic England is the revised sheets 12 and 13 of the Works Plan <b>[DEC/C.2.4_D]</b> submitted with the Applicant's letter dated 6 August 2024 in response to the SoS's first RfI.</p>

16	West Lindsey District Council	As above	<p>WLDC notes the request made to the applicant to revise the design of the Proposed Development to remove solar arrays on land between the Thorpe in Fallows Scheduled Monument (1016978) and the former historic east-west boundary recorded on the 1886 25-inch Ordnance Survey map. WLDC have been invited to confirm if they are content with this request. The position taken by WLDC was that removing solar panels and associated infrastructure back to the historic northern boundary would be required to ensure the impacts upon the Scheduled Monument were acceptable.</p> <p>Upon request, the Applicant has provided WLDC with an updated work plan (Ref: P2981_LPR_ZZ_ON_DR_Z_0064) (dated 23/07/2024) drawing removing solar panels from the area concerned. It is understood that Historic England have also received and reviewed this amended drawing and has confirmed that it addresses their concerns with regard to impacts on the scheduled monument.</p> <p>WLDC welcomes this amendment and agrees with Historic England in that it addresses the principal objections. There</p>	<p>As set out in the Applicant's letter dated 6 August 2024 in response to the SoS's first RfI, the land has been retained within the Order limits as it may be required for underground cabling (Work No. 1A(iv)) and landscape and ecological measures (Work No. 7A). Further details are set out in the revised version of Cottam 1 South Sheet 2 of the Landscape and Ecology Mitigation and Enhancement Plan <b>[DEC/C6.4.8.16.5_B]</b> that was also submitted on 6 August 2024.</p>
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			<p>are, however, some further clarification that would be helpful in order to fully understand the nature of the proposed changes:</p> <p>It is noted that the amended work plan supplied to WLDC is annotated for Works 1a(iv) (electrical and communications cabling connecting Work No. 1A(iii) to Work No. 4A) and Work No. 7A (variety of works including fencing/boundary treatments, security and lighting, landscaping and biodiversity mitigation, maintenance of existing and creation of new internal access tracks, footpath diversions, earthworks, sustainable drainage system ponds and general drainage, acoustic barriers, electricity and telecommunications connections and temporary construction/ decommissioning laydown areas).</p> <p>In the absence of an updated indicative site layout plan, it is not clear what development is likely still to be proposed in the area where solar panels have been removed. Such works would include earthworks and fencing. WLDC would welcome clarification of why these works appear to still be retained to be</p>	
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			<p>authorised within the defined area of particular sensitivity with regard to the setting of the Scheduled Monument.</p> <p>Work No. 7A provides for a wide range of development that isn't as yet defined and WLDC would be grateful for clarity to ensure that the impacts on the setting of the Scheduled Monument are clear.</p> <p>WLDC would also welcome confirmation as to what other application documents will be updated to reflect the amendment, particularly those documents to be 'Certified' and form the basis of DCO 'requirements' (e.g. the Outline LEMP).</p> <p>Should the amended documents be submitted, WLC formally requests the opportunity to consider and review the submissions and thereafter provide a further response in writing. WLDC request that clear timescales for the submissions are provided, such that sufficient time is afforded for all Interested Parties to adequately consider the information and provide a full written response thereafter.</p>	
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Requirement 12 (Archaeology) / Without Prejudice Written Scheme of Investigation				
17	Historic England	<p>The <b>Applicant, Lincolnshire County Council, Nottinghamshire County Council, and Historic England</b> are requested to comment on any concerns on the following amendment to Requirement 12:</p> <p>“(1) The authorised development must be implemented in accordance with a revised final WPWSI which is to be approved by the relevant Planning Authorities</p> <p>(2) No development may commence until an overarching Archaeological Mitigation Strategy, which must be in accordance with the revised final WPSWI, has been submitted to and approved by the relevant Planning Authorities</p>	<p>As we understand it a ‘without prejudice written scheme of investigation’ describes further (post-DCO) archaeological evaluation trenching and an associated palette of techniques for archaeological mitigation. A revised final version of this WPWSI would inform an overarching archaeological mitigation strategy (AMS) for the delivery of the project. Site specific written schemes of investigation (WSI) for archaeological mitigation work would be subordinate to the AMS. This appears a sensible structure to ensure that mitigation is both informed by archaeological evidence and strategic in its approach across the scheme.</p> <p>With regards to revised wording of requirement 12 we refer the Secretary of State to the advice of the Local Planning Authorities as it is they (with the expertise of their own archaeological advisors) who will be responsible for the approval of the documents discussed above. The wording of the requirement needs to be robust and clearly comprehensible to the authorities, the applicants, and any future beneficiaries of the consent. The</p>	<p>The Applicant notes this comment and highlights Historic England’s agreement that the WPWSI <i>“appears a sensible structure to ensure that mitigation is both informed by archaeological evidence and strategic in its approach across the scheme.”</i></p> <p>The Applicant also notes Historic England’s referral of the revised wording of requirement 12 to the relevant planning authority <i>“as it is they (with the expertise of their own archaeological advisors) who will be responsible for the approval of the documents discussed above”</i>.</p> <p>The Applicant refers to the reasons for its proposed drafting as set out in the Applicant’s letter dated 6 August 2024 in response to the SoS’s first RfI.</p>

		<p>(3) 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 (which must accord with the revised final WPWSI) has been submitted to and approved in writing by the relevant Planning Authorities</p> <p><i>(4) The approved scheme must identify—</i></p> <p><i>(a) areas where archaeological work is required; and</i></p> <p><i>(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).</i></p> <p><i>(5) Pre-construction archaeological investigations</i></p>	<p>requirement should ensure the whole archaeological process is appropriately secured from fieldwork through analysis, assessment, reporting, archiving and dissemination.</p>	
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		<p><i>and pre-commencement material operations which involve intrusive ground works may take place only in accordance 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."</i></p>		
17	Lincolnshire County Council	As above	<p>The suggested wording has been discussed with Nottinghamshire County Council and both Council's consider the updated wording is still somewhat confusing and do not agree to it. Also it is noted that the evaluation trenching was not completed as part of the usual pre application assessment process and this will need to be addressed before a final mitigation strategy is submitted and agreed.</p> <p>The Without Prejudice Written Scheme of Investigation referenced in the amended requirement wording is not fit for purpose and should be dropped in its</p>	<p>The Applicant refers to the reasons for its proposed drafting as set out in the Applicant's letter dated 6 August 2024 in response to the SoS's first RfI.</p> <p>It is the Applicant's position that LCC's in-principle objection to the contents of the Without Prejudice Written Scheme of Investigation is the main reason for LCC rejecting the Applicant's proposed drafting.</p> <p>The reference to "substantially in accordance with" in DCO requirements is a standard and well understood approach.</p> <p>The Applicant does not agree to LCC's proposed drafting as it makes no reference</p>

			<p>entirety in favour of an agreed 'archaeological mitigation strategy' which will later be supplemented by detailed Written Schemes of Investigation (WSIs) for each phase of work. These by necessity cannot be described as 'without prejudice'.</p> <p>It is the Council's view that the amended wording still presents difficulties as it would lead to significant problems for post consent implementation of the scheme, for example the inclusion of 'must be substantially in accordance with the without prejudice written scheme of investigation' . The Council's view is The Without Prejudice Written Scheme of Investigation is not appropriate and the use of the phrase 'without prejudice' should not be included in a DCO requirement. The term 'substantially in accordance' leaves scope for disagreement as to what 'substantially' means and can be interpreted differently by both sides leading to tensions.</p> <p>Set out below is an alternative wording that the Council considers is more appropriate and in is line with the Archaeological Requirement incorporated</p>	<p>to the Without Prejudice Written Scheme of Investigation. This will result in considerable uncertainty for the Applicant as to the nature and quantum of trial trenching that is required pre-construction which has the potential to significantly delay construction and potentially result in the Scheme not being able to meet its grid connection date.</p> <p>The Applicant is amenable to changing the title of the WPWSI to 'Archaeological Mitigation Strategy (AMS)' as per Nottinghamshire County Council's recommendation but does not consider it necessary as it is the contents of the document that is relevant for the purposes of discharging the requirement not the title.</p>
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			<p>into the DCO for Mallards Pass which the Secretary of State approved on 12 July 2024.</p> <p>(1) No development may commence until an Archaeological Mitigation <del>Scheme</del> Strategy has been submitted and approved by the relevant Planning Authorities, such approval to be in consultation with Historic England. This shall include:</p> <p>(a) a scheme for additional trial trenching which has been submitted to and approved by the relevant planning authorities, in consultation with Historic England;</p> <p>(b) additional trial trenching has been carried out in accordance with the scheme approved under sub-paragraph (a); and</p> <p>(c) updates are made to the Archaeological Mitigation Strategy to account for the results of the additional trial trenching carried out and the updated Archaeological Mitigation Strategy is submitted to and approved in writing by both relevant planning authorities and Historic England.</p>	
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			<p>(2) The authorised development must be carried out in accordance with the updated Archaeological Mitigation Strategy approved under sub-paragraph 1(c).</p> <p>(3) 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 (which must accord with the revised final Mitigation Strategy) has been submitted to and approved in writing by the relevant Planning Authorities</p> <p>(4) The approved scheme must identify— (a) 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).</p> <p>(5) Pre-construction archaeological investigations and pre-commencement material operations which involve intrusive ground works may take place only in accordance with the approved</p>	
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			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."	
17	Nottinghamshire County Council	As above	<p>The proposed changes to the requirement wording provide a somewhat confusing take on the process that will need to be followed if the DCO is issued.</p> <p>In the first instance, the applicant will need to produce an Archaeological Mitigation Strategy (AMS) which will describe the overall approach to the archaeological work for the whole site/project and give details of where and what is going to happen in each area and at what stage. This will then need to be supplemented by far more detailed methodologies or Written Schemes of Investigation (WSI) for each element/phase that the applicant's archaeological contractor will need to produce in advance of them doing the work.</p> <p>The proposed requirement wording also reference a WPWSI which means 'Without Prejudice Written Scheme of</p>	The Applicant refers to its response to LCC above.

			<p>Investigation'. NCC recommend that 'Without Prejudice' be removed. It was used originally as a mechanism to try to resolve outstanding points of disagreement during the NSIP assessment and examination process and suggests there is no commitment to undertake the requirements as agreed and is therefore inappropriate in terms of requirement/condition wording.</p> <p>NCC recommend that the requirement wording is amended to:</p> <p>"(1) No development may commence until an Archaeological Mitigation Strategy (AMS) has been submitted to and approved by the relevant Planning Authorities;</p> <p>(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 (which must accord with the revised final Archaeological Mitigation Strategy) has been submitted to and approved in</p>	
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			<p>writing by the relevant Planning Authorities;</p> <p>(3) The approved scheme must identify—</p> <p>(a) areas where archaeological work is required; and</p> <p>(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);</p> <p>(4) Pre-construction archaeological investigations and pre-commencement material operations which involve intrusive ground works may take place only in accordance 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."</p>	
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Discharge of Requirements				
20	Nottinghamshire County Council	The <b>Applicant, Lincolnshire County Council, Nottinghamshire County Council, West Lindsey District Council, and Bassetlaw District Council</b> are asked for their final position on a realistic and proportionate timescale for the discharge of requirements.	NCC would align with the approach suggested by West Lindsey District Council [REP6-011] that 16 weeks would be an appropriate time frame considering the number of applications for NSIP developments coming forward in Lincolnshire and Nottinghamshire and the additional pressure this would create.	For the reasons given in the Applicant's letter dated 6 August 2024 in response to the SoS's first RfI, the Applicant disagrees with the 16 week discharge period proposed by Nottinghamshire County Council and instead has proposed a 10 week discharge period, which is aligned to that proposed by Lincolnshire County Council.
20	Lincolnshire County Council	As above	In respect of paragraph 19 the Council share the concern of West Lindsey District Council regarding the number of NSIPs that continue to emerge in Lincolnshire which has now reached 22 and continues to grow in number and complexity. The sheer volume of these projects does put pressure on the Council's modest resources and therefore additional time to assess the details submitted to discharge the requirements would be welcome. However, the Council recognise that this has to be proportionate to the requirements of the developer as well and therefore	For the reasons given in the Applicant's letter dated 6 August 2024 in response to the SoS's first RfI, the Applicant agrees with the 10 week discharge period submitted by Lincolnshire County Council.

			continues to submit that a 10 week discharge period would be a reasonable compromise.	
20	West Lindsey District Council	As above.	<p>WLDC maintains its position and reasoning expressed during the examination of the Application.</p> <p>Many of the proposed DCO 'requirements' oblige the submission of significant technical information that will require careful assessment by the approving authorities (of which WLDC holds that role for the majority of the 'requirements'). Many of the details to be submitted will require consultation with technical consultees (including statutory bodies) in order to make an informed decision in the public interest.</p> <p>The suggested 16-week period made by WLDC is based upon the subsequent approval of details pursuant to 'requirements' relating to development subject to Environmental Impact Assessment (EIA). WLDC has identified the 'requirements' where it would be fair and proportionate in the interests of 'good planning' to benefit from a 16-week period; namely draft DCO 'requirement' 5</p>	For the reasons given in the Applicant's letter dated 6 August 2024 in response to the SoS's first RfI, the Applicant disagrees with the 16 week discharge period proposed by West Lindsey District Council and instead has proposed a 10 week discharge period, which is aligned to that proposed by Lincolnshire County Council.

			<p>which reserves a significant amount of project details for subsequent approval.</p> <p>A key practical driver for the suggested approval periods is the cumulative situation with other NSIP solar projects that WLDC may find itself required to deal with subsequent approvals for. Cottam constitutes one of five potential solar NSIP projects that, if all granted development consent, could come forward for implementation on similar timelines. This would rationally result in multiple developers seeking to secure approval of 'requirements' on similar timeframes, which would significantly compromise the ability of WLDC to consult with statutory bodies, assess and determine such details.</p> <p>We consider that, to have nationally significant infrastructure projects of the same infrastructure type, in such close proximity, and operating to similar timescales for commencement, is a somewhat unique situation which requires recognition and careful consideration.</p> <p>WLDC has noted the ExA's recommendation report for the Gate</p>	
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			<p>Burton Energy Park, which states at paragraph 7.4.20: "The other schemes are not approved and I must consider the matters before me. On this basis I am firmly of the view ten weeks is a reasonable and appropriate period." WLDCs view is that this judgement on the appropriateness of a 10-week period is a 'baseline' where there was only one single set of DCO requirements to determine. That is no longer the case in consideration of the Cottam DCO. It therefore follows that if the Cottam Solar Project is granted development consents, a necessarily longer determination period is required.</p> <p>Following approval of the Gate Burton Solar Project DCO, this already places the responsibility upon WLDC to assess eleven different requirements (subject to a deemed consent), of which the vast majority are pre-commencement requirements. Whilst the DCO requires works to commence within 5 years, the developer has previously indicated a start as early as early 2025, suggesting applications to discharge requirements will be made within a narrow window.</p>	
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			<p>The Cottam Draft DCO (rev G) proposes a similar burden – in the event consent is granted as drafted in the dDCO, WLDC will have responsibility for a further twelve requirements, the majority of which are again, pre-commencement requirements. The ES envisaged that works would commence “at the earliest, in Q4 2024” (EIA paragraph 4.6.1) suggesting once more that a narrow window is proposed and that overlap with the Gate Burton Project is likely.</p> <p>The DCO ‘requirements’ are important stages in the delivery process of NSIP projects and require care and attention to ensure that impacts on the environment and communities are minimised. WLDC do not consider them to be a ‘fait accompli’ exercise that places no burden or obligations upon itself as the host authority.</p> <p>WLDC does not consider ensuring adequate timescales to assess and approval technical details relating to major infrastructure projects to be an unreasonable request. WLDC would contend that the suggested timescale is</p>	
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			<p>not done so as to avoid progressing the approval of 'requirements' as efficiently as possible. The suggested timescales would, in WLDC's view, enable more efficient approach to working with consultees and applicants to enable any issues to be resolved within a proportionate approval period. WLDC therefore maintains its position that the suggested approval periods are realistic and proportionate.</p>	
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