

**Tillbridge Solar Project
EN010142**

**Applicant's Response to Written Submissions at
Deadline 2**

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**Planning Act 2008
The Infrastructure Planning (Examination Procedure) Rules 2010**

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1. Introduction

1.1 Purpose of this document

- 1.1.1 The purpose of this report is to provide Tillbridge Solar Limited's (the Applicant) response to the Written Submissions submitted by Interested Parties (IP) at Deadline 2 of the Examination for the Tillbridge Solar Project (the Scheme).
- 1.1.2 The Development Consent Order (DCO) application (the Application) for the Scheme was submitted on 10 April 2024 and accepted for Examination on 8 May 2024. The period when IPs could submit RRs on the Application was from 13 June 2024 to 01 August 2024. Deadline 2 was on the 14 November 2024.
- 1.1.3 A total of 74 Written Submissions were submitted to the Examination at Deadline 2. Eight of these were from the Applicant, with 66 being from IPs.
- 1.1.4 To avoid repetition, the Applicant has only provided a full response to comments that make points that have not been addressed previously within the **Applicant's Responses to Relevant Representations [REP1-028]** or where the Applicant considers that further clarification may be useful. In response to matters that were raised previously in Relevant Representations or at the first hearings for the Examination, the Applicant has provided a reference to where the matter has previously been responded to in the **Applicants Response to Relevant Representations [REP1-028]**, the **Written Summary of Applicant's Oral Submissions at Issue Specific Hearing 1 [REP1-046]** or the **Written Summary of Applicant's Oral Submissions at Open Floor Hearing 1 [REP1-047]**.

1.2 Structure of this document

- 1.2.1 This document provides a response from the Applicant to Written Submissions received at Deadline 1, and is structured as follows:
- **Table 2-1: Statutory Consultees:** the Applicant's responses to Written Submissions from Statutory Consultees.
 - **Table 2-2: Non-Statutory Organisations:** the Applicant's responses to Written Submissions from Non-Statutory Organisations.
 - **Table 2-3: Local Authorities, Parish Councils, Persons with an Interest in the Land and Public:** the Applicant's responses to Written Submissions from Local Authorities, Parish Councils, Persons with an Interest in the Land and the Public.
- 1.2.2 The documents submitted with the Application are also referenced in this document, using the reference number given in the Examining Authority Examination Library (e.g. **[APP-XXX]**, or **[AS-XXX]**) where a document which has previously been submitted is referenced, or the Applicant's reference number (e.g. **[EN010142/APP/XX(RevX)]**) where a new document is being submitted at Deadline 3. All documents are also presented in numerical order in the **Guide to the Application [EN010142/APP/1.2(Rev05)]**.

Table 1-1. List of Interested Parties that submitted Written Submissions at Deadline 2

Reference Number	Consultee
Statutory Consultees	
REP2-009, REP2-010	Environment Agency
REP2-013	Ministry of Defence (MOD)
REP2-014	National Grid
REP2-015	Network Rail Infrastructure Limited
REP2-048	EDF Energy (Thermal Generation) Limited
Non-Statutory Consultees	
REP2-018, REP2-019, REP2-020, REP2-020, REP2-021, REP2-022, REP2-023, REP2-024, REP2-025, REP2-026, REP2-027, REP2-028, REP2-029, REP2-030, REP2-031, REP2-032, REP2-033, REP2-034, REP2-035	7000 Acres
Local Authorities, Parish Councils, Persons with an Interest in the Land and the Public	
REP2-016, REP2-017	West Lindsey District Council
REP2-041	Broxholme Parish meeting (Solar Group)
REP2-051, REP2-052	Glentworth Parish Council
REP2-036, REP2-037	Andy Johnson
REP2-038	Bingham family
REP2-040	Brian Hedley
REP2-042	Carol Montgomery
REP2-043	Christopher Reeve
REP2-044	Claire Ella
REP2-045, REP2-046	Derek Paul Cater
REP2-047	Dorne Carole Johnson
REP2-049	Elizabeth Clare Garbutt
REP2-050	Geraldine Roy
REP2-053	Graeme Beattie
REP2-054	Helen Mitchell
REP2-055	Ivan Annibal
REP2-056	Jamie Allen
REP2-057	John Arnold Hallam
REP2-058	John Robert Perkins
REP2-059	Katharine McIlroy
REP2-060	Kimberly Coxon
REP2-061	Liz Garbutt
REP2-062	Lynn Thompson

Reference Number	Consultee
REP2-063	Mark Wardle
REP2-064	Mike and Sue Dewsbury
REP2-065	Nick Mapstone
REP2-066	Nuala Margaret May
REP2-067	Sally Ann Constable
REP2-068	Shelley Rapley
REP2-069	Simon Jeremy Parker
REP2-070	Simon Skelton
REP2-071	Sophie Dhokia
REP2-072	Susan Durrant
REP2-073, REP2-074	Vanda Colman

1.2.3 For ease of reference, a table of acronyms used in this document is provided in **Table 1-2**. Abbreviations of this document.

Table 1-2. Abbreviations

Abbreviation	Definition
AGLV	Area of Great Landscape Value
ALC	Agricultural Land Classification
BESS	Battery Energy Storage System
BMV	Best and Most Versatile Land
CEMP	Construction Environmental Management Plan
CCTV	Closed Circuit Television
CNP	Critical National Priority
CLG	Community Liaison Group
DCO	Development Consent Order
DEMP	Decommissioning Environmental Management Plan
EIA	Environmental Impact Assessment
ES	Environmental Statement
EMF	Electro Magnetic Fields
GHG	Greenhouse Gas
GW	Gigawatt
HGCA	Home Grown Cereals Authority
IEMA	Institute of Environmental Management and Assessment
ICNIRP	International Commission on Non-Ionizing Radiation Protection
IPs	Interested Parties
LEMP	Landscape and Ecological Management Plan
LVIA	Land and Visual Impact Assessment
MAFF	Ministry of Agriculture Fisheries and Food

Abbreviation	Definition
MW	Megawatt
NESO	National Energy System Operator
NGET	National Grid Electricity Transmission plc
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
OEMP	Operational Environmental Management Plan
OHID	Office for Health Improvement and Disparities
PA	Planning Act 2008
PINS	Planning Inspectorate
PRoW	Public Right of Way
PV	Photovoltaic
RR	Relevant Representation
SoCG	Statement of Common Ground
TCPA	Town and Country Planning Act
TPO	Tree Preservation Order

2. Applicant's Responses to Written Submissions at Deadline 2

2.1 Statutory Consultees

Table 2-1. Applicant's Responses to Written Submissions at Deadline 2 – Statutory Consultees

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
Ecology and Biodiversity				
REP2-009. REP2-010	Environment Agency	Impacts on fish	Request for monitoring of the impacts on fish to be included in the Operational Environmental Management Plan	<p>The Environment Agency's request for the monitoring of impacts on fish, relating to the potential impacts of EMFs, has been addressed within the Framework Operational Environmental Management Plan (OEMP) [EN010142/APP/7.9(Rev02)] (see Page 15). The Framework OEMP sets out that a programme for monitoring the potential impacts of EMF on fish in the River Trent at the location of the buried cable crossing will be developed to form an appendix of the detailed OEMP (unless otherwise agreed by the Environment Agency and Natural England). The programme must be approved by the Environment Agency and Natural England before being adopted into the final OEMP. The programme will be prepared in collaboration between the Applicant, the Environment Agency and Natural England and may draw on specialist and academic advice from organisations conducting similar fisheries research within the River Trent catchment and Humber Estuary. It is understood that existing and ongoing research into fish movements in this area may be able to be expanded and the Applicant will seek opportunities to coordinate the monitoring into any ongoing research exercise. This commitment and approach to monitoring has been agreed with the Environment Agency, as presented within the Statement of Common Ground (SoCG) with the Environment Agency [EN010142/APP/9.16(Rev01)].</p> <p>The programme can be undertaken by the Applicant, by or in collaboration with the developers of the other solar projects and/or by a third party (for example, a university research team). The commencement of the monitoring will be subject to any necessary consents from landowners or other stakeholders, for example the Canal and River Trust / Marine Management Organisation. It is envisioned that the monitoring would continue for at least three years following commissioning of the first cable crossing installed beneath the River Trent at this location.</p>
Hydrology, flood risk and drainage				
REP2-009. REP2-010	Environment Agency	CEMP	Request to be a named consultee on the CEMP and the decommissioning and restoration plan to enable further opportunities to comment on emergency response plan and river crossing proposals	<p>The draft DCO [EN010142/APP/3.1(Rev04)] includes the Environment Agency as a named consultee on the detailed CEMP (see Schedule 2, Requirement 12(1)) and the Decommissioning Environmental Management Plan (see Schedule 2, Requirement 20).</p> <p>The Framework Construction Environmental Management Plan (CEMP) [EN010142/APP/7.8(Rev02)] (Page 7, paragraph 2.10.1) notes that "An Emergency Response Plan (ERP) will be developed in consultation with... the Environment Agency in relation to responding to flood warnings and events." and paragraph 2.10.2 states "The ERP will detail the procedures for responding to incidents and emergencies on site, and</p>

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
REP2-009. REP2-010	Environment Agency	Compounds	Comment that the EA are happy subject to a Condition being included in the DCO to secure a safe refuge within the north and south temporary construction compounds in Flood Zone 3 and for the Emergency Response Plan to include a requirement for the appropriate persons to sign up to the Environment Agency's flood warning service as well as including details of the evacuation plans for the site on receipt of a flood warning.	<i>any reporting and will include details of the evacuation plans for the site on receipt of a flood warning."</i> Following analysis of Product 4 data, Appendix 10-3: Flood Risk Assessment of the ES [EN010142/APP/6.2(Rev01)] has been updated at Deadline 3, with a technical note provided in Annex F, to assess the flood risk in detail at the two temporary compounds within the floodplain of the River Trent. This analysis identified additional flood risk mitigation in relation to the temporary compounds. Provision for a safe refuge, and the requirement for an evacuation plan on receipt of a flood warning has been included within the updated Framework CEMP [EN010142/APP/7.8(Rev02)] , Table 3-5 and paragraph 2.10.2 respectively, which has been submitted into examination at Deadline 3. As set out within the SoCG with the Environment Agency [EN010142/APP/9.16(Rev01)] , the Applicant has agreed with the Environment Agency that the mitigation can be secured within the Framework CEMP [EN010142/APP/7.8(Rev02)] instead of a standalone condition, as the implementation of the Framework CEMP is secured via Requirement 12 of the draft DCO [EN010142/APP/3.1(Rev04)] .
REP2-009. REP2-010	Environment Agency	FRA	Comment that Section 8.1.2 of the Flood Risk Assessment needs amending to take account of the findings in relation to the temporary compound	The Appendix 10-3: Flood Risk Assessment of the ES [EN010142/APP/6.2(Rev01)] has been updated, with a technical note provided in Annex F, to assess the flood risk in detail to the two temporary compounds within the floodplain of the River Trent. The following mitigation measure is set out in section 7.1.3 (previously 8.1.2): <ul style="list-style-type: none"> - It is proposed that safe refuge is provided at both the North and South temporary construction compounds with finished floor levels no lower than 7.66m AOD, to provide freeboard to a breach event. This requirement is presented within the Framework CEMP [EN010142/APP/7.8(Rev02)] submitted into examination at Deadline 3.
Ground conditions and contamination				
REP2-009. REP2-010	Environment Agency	CEMP	Comment stating that the EA's previous request to be involved in discussions about contamination on site is considered to have been addressed, provided the final DCO ensures we are consulted on the CEMP and this, in turn, secures consultation with us before any remedial works take place	The Framework CEMP [EN010142/APP/7.8(Rev02)] (Page 60) notes that the Environment Agency is to be consulted on the findings of the Site Investigation and any proposed remedial works related to the protection of controlled waters and the regimes that the Environment Agency regulate. Requirement 12 of the draft DCO [EN010142/APP/3.1(Rev04)] provides that the detailed Construction Environmental Management Plan(s) must be in substantial accordance with the Framework CEMP [EN010142/APP/7.8(Rev02)] . Additionally, the draft DCO [EN010142/APP/3.1(Rev04)] notes the Environment Agency as a named consultee on the CEMP (see Schedule 2, 12(1)).
Battery Energy Storage				
REP2-009.	Environment Agency	BESS	Comment that it is considered that the EA's comments on this topic can be addressed if the EA is a named consultee	The draft DCO [EN010142/APP/3.1(Rev04)] includes the Environment Agency as a named consultee in relation to the Battery Safety Management Plan (see Schedule 2, Requirement 6); and the CEMP (see Schedule 2, Requirement 12(1)). The Framework CEMP [EN010142/APP/7.8(Rev02)] (page 7) also secures an Emergency Response

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
REP2-010			on the Battery Safety Management Plan and CEMP (and this includes an emergency response plan)	Plan. Requirement 12 of the draft DCO [EN010142/APP/3.1(Rev04)] provides that the detailed Construction Environmental Management Plan(s) must be in substantial accordance with the Framework CEMP [EN010142/APP/7.8(Rev02)] .
draft DCO				
REP2-009. REP2-010	Environment Agency	Protective Provisions	Comment that the EA does not agree to the Protective Provisions included in the draft DCO. Comment that it is anticipated the EA will have agreed a set of national Protective Provisions which can apply to this matter by the end of November 2024.	The Applicant is continuing to engage with the Environment Agency on protective provisions. It is noted that the Environment Agency is currently in the process of updating, at a national level, their standard set of protective provisions. The Applicant understands that this exercise is anticipated to be completed by the end of December 2024 and that the Environment Agency will update the Applicant once the protective provisions have been agreed internally. It is also noted that, as stated by the Environment Agency at Issue Specific Hearing 1 on 15 October 2024, the Environment Agency do not anticipate any fundamental disagreement regarding the protective provisions and are confident that the parties will reach agreement within the examination period. The Applicant is similarly confident the Protective Provision wording can be agreed within the examination period.
REP2-009. REP2-010	Environment Agency	Schedule 2	Comment that the EA wish to be a specific named consultee in respect of the Schedule 2 requirements for landscape and ecological management, biodiversity net gain and the OEMP.	The draft DCO [EN010142/APP/3.1(Rev04)] includes the Environment Agency as a named consultee within the Framework OEMP [EN010142/APP/7.9(Rev02)] (see Schedule 2, Requirement 13(1)), the Landscape and Ecological Management Plan (see Schedule 2, Requirement 7(1)) and the Biodiversity Net Gain Strategy (see Schedule 2, Requirement 8(1)).
Rights				
REP2-014	National Grid Electricity Transmission (NGET)	Rights	Comment that NGET will require appropriate protection for retained or proposed apparatus, including compliance with relevant standards for works proposed within close proximity of its apparatus or proposed apparatus. NGET's rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order Limits must be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's apparatus, NGET will require appropriate protection.	The Applicant acknowledges NGET's requirements in respect of its apparatus. The parties are subject to ongoing negotiations in respect of protective provisions to ensure appropriate protections and controls are in place to manage any impacts on that apparatus, and will update the ExA further once these negotiations conclude.
Compulsory Acquisition				
REP2-014	National Grid Electricity Transmission (NGET)	Compulsory Acquisition	Comment that NGET notes that the Book of Reference and Land Plans indicate that powers for the permanent acquisition of and temporary possession of land and extinguishment of rights are included over NGET's operational land and industrial apparatus. NGET strongly opposes any compulsory acquisition or extinguishment of rights over its operational land. Any such powers would	The Applicant acknowledges NGET's position in respect of compulsory acquisition rights, however, requires these powers to ensure the Scheme can be developed, should the parties be unable to agree necessary property rights for the construction and operation of the Scheme. However, it is noted that the draft DCO [EN010142/APP/3.1(Rev04)] includes Article 32 (statutory undertakers) which gives the undertaker powers with respect to land and apparatus belonging to statutory undertakers, subject to the provisions of the protective provisions in Schedule 15. The protective provisions

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
			cause serious detriment to NGET's ability to comply with its statutory duties.	therefore provide appropriate protection and controls on the undertaker's ability to exercise such powers, ensuring protection of NGET's property and undertaking. The Applicant is currently negotiating protective provisions with NGET. The parties are also subject to ongoing negotiations in respect of such property rights, and will update the ExA further once these negotiations conclude.
REP2-015	Network Rail	Compulsory powers	Objection against compulsory powers and the exercise of class rights over certain plots (class 1 and 2 land) due to negative impacts to safety and efficiency of railway which present public safety concerns	The Applicant acknowledges Network Rail's position in respect of compulsory acquisition rights, however, requires these powers to ensure the Scheme can be developed, should the parties be unable to agree necessary property rights for the construction and operation of the Scheme. However, it is noted that the draft DCO [EN010142/APP/3.1(Rev04)] includes Article 32 (statutory undertakers) which gives the undertaker powers with respect to land and apparatus belonging to statutory undertakers, subject to the provisions of the protective provisions in Schedule 15. The protective provisions therefore provide appropriate protection and controls on the undertaker's ability to exercise such powers, ensuring protection of Network Rail's property and undertaking. The Applicant has agreed protective provisions with Network Rail. The parties are also subject to ongoing negotiations in respect of such property rights as well as protective provisions to ensure the continued safe and efficient operation of railway assets, and will update the ExA further once these negotiations conclude.
Cumulative Impacts				
REP2-014	National Grid Electricity Transmission (NGET)	Cumulative Impacts	Concerns over interference of the Scheme with route corridors overlapping immediately east of Cottam Power and construction occurring simultaneously with the North Humber to High Marnham Project and potentially the SCRE / WRRE Project.	<p>Based on the 'Supplementary Corridor and Routing Report' (Ref 1-1) published in July 2024, the North Humber to High Marnham (NHHM) DCO submission is only expected to occur in 2026. Following which there will be an Examination and detailed design period. The Tillbridge Solar Project (the Scheme) is therefore at least two years ahead of NHHM in the planning process. The construction peak for the Scheme is expected to occur in 2026, therefore, it is unlikely that the construction of the Scheme would have a temporary overlap with the construction phase of NHHM. Should the NHHM scheme be consented, and then constructed, construction will likely occur once the Tillbridge Scheme is operational. There would be limited potential for cumulative effects during the Tillbridge operational phase due to the limited movements required as part of the maintenance and operation of the Tillbridge Scheme. Furthermore, based on information currently known about NHHM from consultation material, potential geographical overlap with the Scheme would be limited to the Cable Route Corridor, where there would be expected to be no operational traffic needed.</p> <p>As it is unlikely there will be temporal or geographical overlap between NHHM and the Scheme, the Applicant considers it reasonable to scope out the NHHM project from the cumulative assessment. NGET's Relevant Representation [RR-206] highlights a potential interaction, and an expectation that construction periods will overlap. The Applicant respectfully does not concur with this expectation. Notwithstanding this, NGET highlights the ongoing co-operation between the Parties, and the Applicant is committed to continuing this positive engagement.</p>

Impacts to bridges and level crossings

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
REP2-015	Network Rail	Bridges and level crossings	Concerns over the impact to bridges and level crossings	The Applicant acknowledges Network Rail's concerns and requirements in respect of impacts to the ongoing operation of its assets. The parties are subject to ongoing negotiations in respect of any impacts on Network Rail assets, including the negotiation of protective provisions to ensure appropriate protections and controls are in place to manage any impacts on those assets, and will update the ExA further once these negotiations conclude. These discussions are set out in the Statement of Common Ground with Network Rail [REP2-008] , and any updates will be reflected in future versions of this SoCG.

2.2 Non-Statutory Organisations

Table 2-2. Applicant's Responses to Written Submissions at Deadline 2 – Non-Statutory Organisations

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
Climate and carbon				
REP2-028	7000 Acres	Global decarbonisation	<p>Comment that it is impossible for a Scheme such as Tillbridge to have a "Beneficial (significant)" impact on global climate greenhouse gas emissions.</p> <p>Comment that the reduction in CO2 from this Scheme is negligible in the global context and should be weighed against the local harms which would arise.</p> <p>Comment that very little weight should be given to this scheme with regard to the global impact on decarbonisation for the UK given it is already taking steps to minimise CO2 emissions.</p>	<p>Chapter 7: Climate Change of the ES [APP-038] considers all GHG emissions arising over the lifecycle of the Scheme including direct GHG emissions arising from activities within the Order limits, indirect emissions from activities outside the Order limits and embodied carbon within construction materials (including but not limited to manufacture, transportation and construction emissions). As set out in section 7.8 of Chapter 7: Climate Change of the ES [APP-038], GHG emissions savings are expected to be achieved throughout the lifetime of the Scheme compared to alternative fossil fuel energy generation types. Therefore, the GHG emissions during construction, operation and decommissioning of the Scheme are considered to be 'offset' by the net positive impact of the Scheme on GHG emissions.</p> <p>The assessment in Chapter 7: Climate Change of the ES [APP-038] considers GHG emissions in the context of the UK as the purpose of, and need for, the Scheme is to contribute to reducing emissions in the UK to help meet the Governments targets for net zero.</p> <p>It is not appropriate or proportionate to consider the reduction in GHG emissions from the Scheme on a global scale.</p> <p>The Applicant's view, as set out in section 7 of the Planning Statement [EN010142/APP/7.2(Rev02)], is that the Scheme will provide significant carbon savings in energy generation and will play a part in transitioning to net zero required by nationally set policy commitments. This should be given substantial positive weight in the planning balance.</p>
REP2-028	7000 Acres	GHG assessment	Comment that there is a lack of meaningful detail provided with regard to the GHG emissions generated by the Scheme	The GHG assessment within Chapter 7: Climate Change of the ES [APP-038] has been completed in line with IEMA and PAS 2080 guidance assessing the entire lifecycle of the Scheme, with detail provided throughout on the activity data and emissions factors used in the assessment.
REP2-033	7000 Acres	Climate change assessment	Comment that the climate change assessment does not demonstrate a detailed breakdown of calculations and that decommissioning estimates are over optimistic	Details of the assumptions used in the calculation of GHG assessments can be found in Section 7.3 of Chapter 7: Climate Change of the ES [APP-038]. Estimates of decommissioning GHG impacts is considered to be an overestimated worst-case scenario, as it is likely that new low carbon construction techniques and technologies will become available into the future.
Solar energy				
REP2-028	7000 Acres	Efficiency	Comment that energy generated by solar is not directly equivalent to how or when it can be used.	The observation regarding "how or when energy can be used" is relative and largely depends on the context. Within most of the application documents, the key focus is on the generating capacity and the limiting grid connection and not the amount of energy generated by the Scheme, as the prior two informs the parameters of the Scheme that are needed in order to undertake necessary assessment and analysis. For a solar power plant (generating station),

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
REP2-028	7000 Acres	Yield	Comment that there will be a loss of yield due to 400KV transmission substation at the point of connection	<p>energy production – which is relevant for the greenhouse gas (GHG) assessment – is modelled for a typical year with hourly resolution. This detailed modelling approach, as outlined in Appendix B of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046], ensures accuracy based on the best available data. For the Environmental Impact Assessment, the annual generation figure is utilised as a fixed, concrete value that remains consistent throughout the evaluation process. The energy generated is directly equivalent to the modelled output over time.</p> <p>The associated Battery Energy Storage System (BESS) addresses the question of "when" the energy can be used. While the solar power plant generates electricity only during daylight hours, the BESS enables the storage of excess or constrained energy for later use. This allows energy generated by the solar array to be discharged when it is most needed, ensuring efficient utilisation of the total generated energy and improving grid reliability.</p> <p>In conducting the energy yield assessment, which is part of the work done by the Applicant to inform the greenhouse gas (GHG) assessment within the application, all potential losses are carefully estimated and calculated to ensure the assessment is robust and ensures the deliverability of the Scheme in the future. Beyond the losses from point of sunlight striking the surface of the PV panels until the subsequent conversion from DC to AC, additional losses occur at various stages of the energy transmission process.</p> <p>These include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Losses during the step-up of voltage from the PV generating station to 33 kV. 2. Transmission losses between the generating station and the onsite substations. 3. Losses during the further step-up of voltage from 33 kV to 400 kV. 4. Transmission losses from the onsite substations to the 400 kV substation at the point of connection. 5. Losses occurring in the 400 kV substation at the point of connection. <p>These losses, along with other inefficiencies not listed here for simplicity, are calculated and incorporated into the overall energy yield figure provided in the relevant documents.</p> <p>The Applicant has provided a summary of the Scheme's expected energy yield in section 6 of Appendix B of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-046].</p>
REP2-028	7000 Acres	Claims made by Applicant	Comment on claims that the solar Scheme can power 300,000 homes are based upon oversimplified claims by developers and are misleading to the public	<p>As set out in Table 2-3, page 17 of the Applicant's Response to Written Submissions at Deadline 1 [REP2-007] the Applicant has calculated that over the 60-year lifetime of the Scheme, it will have a total energy generation figure of approximately 48.5 TWh. Further details of this calculation are available in Appendix B of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046].</p> <p>Ofgem estimates that the typical household in Britain uses 2,700 kWh of electricity per annum. The energy yield for the Scheme over 60 years is 48.5 TWh, 48.5TWh when</p>

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
				<p>converted to kWh equals 48,500,000,000 kWh. 48,500,000,000kWh divided by 60 years is 808,333,333.33kWh. This is the energy yield of the Scheme per annum. 808,333,333.33 kWh (energy yield each year) by 2,700 kWh (the average household usage) = 299,726 homes. The Scheme will therefore generate enough electricity to power approximately 300,000 homes each year on average over the Schemes generating lifetime. The Scheme will export energy to the national electricity transmission system. This distributes energy across Great Britain to wherever it is needed. This means that the energy from the Scheme may support the needs of local homes and businesses, but not exclusively so.</p>
REP2-028	7000 Acres	Sixth Carbon Budget	<p>Comment that use of agricultural land for ground-mounted solar development is not considered in the changing agricultural land use envisaged by the 6CB (Sixth Carbon Budget).</p> <p>Concern that release of agricultural land for solar development would place additional pressure on agricultural land potentially undermining the key changes in agricultural land which are deemed necessary to decarbonise by the 6CB</p>	<p>The Sixth Carbon Budget (Ref 1-2) introduces the 'Balanced Net Zero Pathway' which sets out the actions required in the 2020's to set the UK on track to Net Zero and to meet the recommended Sixth Carbon Budget. Under this pathway, the Sixth Carbon Budget highlights the need for solar in the decarbonisation of the UK, with an increase in solar generation from 10 TWh in 2019, to 60 TWh in 2035 and 85 TWh in 2050. This equates to an average of 3 GW of solar per year needed to be installed to reach these targets. The Balanced Net Zero Pathway also recognises that a transition to Net Zero requires a transformation in the use of land, with around 9% of agricultural land needed for actions to reduce emissions by 2035, and 21% needed by 2050.</p> <p>Policies for the Sixth Carbon Budget and Net Zero include the sustainable management of 18% of lowland cropland area by 2035, see Chapter 7 on Agriculture and Land Use, Land Use Change and Forestry (LULUCF) (Ref 1-36). Arable land is placed in an extended fallow period for the duration of a solar farm development. This extent of arable land in fallow will contribute to the above 18% lowland cropland in sustainable management, rather than be in addition to it. Placing arable land in fallow enables a recovery of soil organic matter that is depleted by arable management. Defra's Best Practice for Managing Soil Organic Matter (SOM) in Agriculture - SP08016 (Ref 1-3) outlines the beneficial effect of such a fallow period on soil organic matter, and the additional environmental benefits that stem from this.</p>
REP2-028	7000 Acres	National policy / publications	<p>Comment that National policy does not explicitly call for large scale ground mounted solar, especially in UK energy policy publications</p>	<p>Large scale ground mounted solar is explicitly covered in UK national energy policy. The Government, in NPS EN-1 (Ref 1-4) concludes there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure, and this includes ground mounted solar. Paragraph 2.10.11 of NPS EN-3 (Ref 1-5) references the Powering Up Britain: Energy Security Plan, highlighting that it states that "<i>government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land, and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.</i>"</p> <p>Paragraph 2.10.10 of NPS EN-3 (Ref 1-5) is also clear that the five fold increase in solar energy deployment of up to 70GW required by 2025 is expected to include both ground and rooftop solar, highlighting the government's position that rooftop solar alone is not envisaged to meet their net zero aims.</p> <p>In addition, NPS EN-3 (Ref 1-5) explicitly applies to solar photovoltaic generation over 50 MW. The Applicant is not aware of any rooftop solar schemes that generate over 50 MW of</p>

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				<p>energy. This again reemphasises the UK Government's position that there is a CNP for this large scale, primarily ground mounted solar infrastructure.</p> <p>The Applicant also notes that whilst NPS EN-1 (Ref 1-4) and NPS EN-3 (Ref 1-5) generally refer to solar or solar farms, there is nothing to suggest that this does not include ground mounted solar, and that interpretation is supported by the more specific references set out above. It is clear that these policy documents expect ground mounted solar of the scale and nature of this Scheme, based on the policy tests referenced in NPS EN-3 (Ref 1-5) in relation to site selection, and the language around the CNP for all onshore renewable energy generation. It is clear from these policy statements, as well as broader Government energy policy, that the government acknowledges rooftop solar alone cannot achieve the energy generation that is required to meet net zero targets and tackle the climate emergency, and that ground mounted solar plays a major part in meeting these targets, due to its affordability and speed at which it can be deployed.</p>
REP2-028	7000 Acres	Ten Point Plan for a Green Industrial Revolution	Comment that the Ten Point Plan explicitly describes the important role of wind, hydrogen, nuclear and Carbon Capture and Storage, with clear ambitions for each, but does not include solar.	<p>The Ten Point Plan for a Green Industrial Revolution (Ref 1-6) was published in 2020, under the 2019 to 2022 Johnson Conservative government. The document also states that its target milestones for 2021 are to "<i>support up to twice the capacity of renewable generation in the next CfD round, with onshore wind and solar projects eligible to bid for CfD contracts</i>".</p> <p>Since the Ten Point Plan was published, the Government has identified through its energy policy, most recently in the Overarching National Policy Statement (NPS) for Energy EN-1 (Ref 1-1) and NPS for Renewable Energy EN-3 (Ref 1-2), that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure in the UK. As discussed in the Applicant's Statement of Need [APP-210], this includes low carbon energy generation using solar technology. Developing the Scheme at its proposed size will therefore be a significant and important contribution to meeting this need.</p>
REP2-028	7000 Acres	Net Zero Strategy: Build Back Greener	Comment that although solar is mentioned, most references are to new build rooftop solar and retrofit solar	<p>The Applicant disagrees that most references to solar in the Net Zero Strategy relate to rooftop or retrofit solar. The Net Zero Strategy (Ref 1-7) mentions the need for solar as a whole, stating that "<i>a low-cost, net zero consistent electricity system is most likely to be composed predominantly of wind and solar generation</i>." The report states at paragraph 36 of Chapter 3 that the sixth Carbon Budget "<i>requires a sustained increase to the deployment of land-based renewables such as locally supported onshore wind and solar in the 2020s and beyond</i>."</p> <p>The Government also supports localised rooftop solar in the report, which the Applicant acknowledges has an important role to play in decarbonisation. However, on their own, smaller scale solar, including rooftop solar, is not likely to deliver sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets.</p> <p>The Government, in NPS EN-1 (Ref 1-4) concludes there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure, including Solar PV. NPS EN-3 (Ref 1-5) explicitly covers solar photovoltaic generation over 50 MW, again reemphasising the UK Government's position that there is a CNP for this type of infrastructure.</p>

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REP2-028	7000 Acres	Powering Up Britain	<p>Comment that reference to large scale solar refers to development on “brownfield, industrial and low/medium grade agricultural land” and “widespread deployment of rooftop solar in commercial, industrial and domestic properties across the UK”.</p>	<p>One of Powering Up Britain’s (Ref 1-8) objectives is to quintuple solar power in the UK by 2035, and the report states that the Government needs to maximise deployment of “<i>both ground and rooftop solar</i>” to achieve their overall target. The report specifically states that ground-mounted solar is one of the cheapest forms of electricity generation and is readily deployable at scale. It is acknowledged that the Government seeks large scale solar deployment across the UK, looking for development on brownfield, industrial and low/medium grade agricultural land, as outlined in 7000 acres comments.</p> <p>In terms of the selection of the site for the Scheme, in accordance with NPS EN-1 (Ref 1-4) paragraph 5.11.3 and NPS EN-3 (Ref 1-5) paragraph 2.10.29, the Applicant considered the use of previously developed (i.e. brownfield) land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. The Applicant has also taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Cottam Substation the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives.</p> <p>The Scheme is located primarily on lower or moderate quality agricultural land, with 95.5% of the land used consisting of 85.6% Grade 3b land (non-BMV/moderate) and 9.9% non-agricultural land. The remaining land, which comprises 4.5% (60.3 hectares) of BMV land, consists of 3.8% (51.1ha) of Grade 3a BMV land and 0.7% (9.2ha) being classed as Grade 2, BMV land. The 4.5% of BMV land within the Principal Site comprises nine small, isolated parcels of BMV land. The parcels do not follow field boundaries and generally form isolated pockets across the Principal Site, as shown in Figure 15-1: Principal Site Agricultural Land Classification Distribution of the ES [APP-192].</p> <p>As set out in Chapter 15: Soils and Agriculture of the ES [APP-046], the vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following the decommissioning of the Scheme. All other infrastructure will be removed allowing agricultural production to resume. Removal of hard standing and access tracks will be followed by reinstatement of the stripped and stored topsoil to restore agricultural land to its previous ALC grade. These measures will be set out in a Decommissioning Environmental Management Plan (DEMP). In accordance with requirement 20 of the draft DCO [EN010142/APP/3.1(Rev04)], this will need to be substantially in accordance with the Framework DEMP [EN010142/APP/7.10(Rev02)] submitted as part of the Application. The only potential permanent removal of BMV land may result from proposed woodland planting, subject to landowner decisions following the decommissioning of the Scheme. However, the potential change of use of 0.07% of agricultural land that is BMV land to proposed woodland is not considered to be significant and would also provide ecological benefit. In addition, the conversion of arable land to grassland during the 60 year operational period has the potential to accrue improvement to soil function over a large area.</p> <p>As discussed in the Statement of Need [APP-210], the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however on its own, smaller scale solar, including rooftop solar, is not likely</p>

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REP2-028	7000 Acres	Skidmore Review	<p>Comment that there are calls for a “Mission for rooftop solar” and a “rooftop revolution”, with no equivalent call for a ground-mounted solar revolution.</p> <p>Comment that the Skidmore review states:</p> <ul style="list-style-type: none"> • solar farms in the countryside should not be planned piecemeal but in a co-ordinated fashion as part of a Land Use Strategy • where located near communities, the utilisation of a consent process — that could be delivered through Local Area Energy Planning, a ‘Net Zero Neighbourhood Plan’ or equivalent — should aim to ensure that these projects are not imposed on local communities. 	<p>to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government’s targets. Whilst rooftop solar is likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Scheme.</p> <p>The Government, in NPS EN-1 (Ref 1-4) concludes there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure, including ground mounted solar. Paragraph 2.10.11 of NPS EN-3 (Ref) references the Powering Up Britain: Energy Security Plan, highlighting that it states that “<i>government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land, and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.</i>”</p> <p>Paragraph 2.10.10 of NPS EN-3 (Ref 1-5) is also clear that the five fold increase in solar energy deployment of up to 70GW by 2025 is expected to include both ground and rooftop solar , highlighting the governments position that rooftop solar alone is not envisaged to meet the governments net zero aims.</p> <p>In addition, NPS EN-3 (Ref 1-5) explicitly covers solar photovoltaic generation over 50 MW, again reemphasising the UK Government’s position that there is a CNP for this type of infrastructure.</p> <p>As discussed in the Statement of Need [APP-210], the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however on its own, smaller scale solar, including rooftop solar, is not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government’s targets. Whilst rooftop solar is likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Scheme.</p> <p>The current consenting system in the UK for large scale infrastructure projects require that a DCO application is submitted to the Planning Inspectorate for large scale solar projects over 50MW. There are no Net Zero Neighbourhood Plans or equivalent within the local area, and the Scheme must nevertheless be consented in accordance with the NPS’s in line with section 104 of the Planning Act 2008 (Ref 1-9).</p>
REP2-028	7000 Acres	Ofgem Connections Actions Plan	<p>Concerns over solar being the largest contributor to grid constipation due to the recent surge in applications for ground mounted solar</p>	<p>National Grid are currently rolling out a number of projects as part of the Great Grid Upgrade, which comprises 17 major infrastructure projects that will both scale up the grid and update existing networks, as part of the largest overhaul of the electricity grid in generations. This is to support the increasing number of renewable energy projects being proposed in the UK to tackle the climate emergency and help the Government meet its net zero targets and objectives. Solar is currently the cheapest and most easily deployable form of renewable energy which is why it is urgently required to deliver large amounts of cheap, secure and low-</p>

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				carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.
REP2-028	7000 Acres	Energy Act	Comment that solar is not once mentioned in the act suggesting the strategic role of solar in the UK's future energy landscape is negligible	<p>Although solar is not mentioned in the Energy Act 2023 (Ref 1-10), large scale ground mounted solar is explicitly covered in UK national energy policy. The Government, in NPS EN-1 (Ref 1-4) concludes there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure, including ground mounted solar. Paragraph 2.10.11 of NPS EN-3 (Ref) references the Powering Up Britain: Energy Security Plan, highlighting that it states that “government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land, and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.”</p> <p>Paragraph 2.10.10 of NPS EN-3 (Ref 1-5) is also clear that the five fold increase in solar energy deployment of up to 70GW by 2025 is expected to include both ground and rooftop solar, highlighting the government's position that rooftop solar alone is not envisaged to meet the governments net zero aims.</p> <p>In addition, NPS EN-3 (Ref 1-5) explicitly covers solar photovoltaic generation over 50 MW, again reemphasising the UK Government's position that there is a CNP for this type of infrastructure.</p>
REP2-028	7000 Acres	National Policy Statements	Comment that NPS EN-5 does not mention solar energy	While NPS EN-1 (Ref 1-4) and EN-3 (Ref 1-5) are relevant to the Scheme as they cover solar development specifically, NPS EN-5 (Ref 1-11) is relevant as it covers the grid connection infrastructure associated with it. NPS EN-5 sets out the need for the electricity network to be able to support the development of CNP infrastructure, such as solar, and therefore the relevant policies from NPS EN-5 have been assessed against the Scheme and are provided in Table 3, Appendix B of the Planning Statement [EN010142/APP/7.2(Rev02)] .
REP2-028	7000 Acres	BEIS committee report	<p>Comment that solar is not key to any recommendations in the report.</p> <p>Comment that the uncoordinated deployment of solar has the potential to interfere with efficient and effective decarbonisation by:</p> <ul style="list-style-type: none"> • Exacerbating issues of excess renewable supply and curtailment, thereby increasing the net cost of a decarbonised energy system. • Competing for land that will be required for direct decarbonisation measures, through tree planting and restoration of peatlands. 	<p>The House of Commons Business, Energy and Industrial Strategy (BEIS) Committee's Eleventh Report of Session 2022–23, titled 'Decarbonisation of the power sector' (Ref 1-12), published on 25 April 2023 specifically states in Chapter 1: Introduction that in order for the Government to meet its decarbonisation targets, they must replace the current gas-fired supply with a new mix of low-carbon generation technologies, including solar.</p> <p>The report also states in its conclusions and recommendations section, at paragraph 17, that “the Government's aim for 70 GW of solar capacity to be installed by 2035 is welcome. Achieving this goal will require the UK to ramp up the pace at which new solar capacity is deployed. We therefore welcome the Government's announcement of a solar roadmap and the establishment of a dedicated government/industry taskforce. We strongly welcome the</p>

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REP2-033	7000 Acres	Rochdale Envelope	<ul style="list-style-type: none"> • Providing additional “clutter” to an already overwhelmed queue of grid connection applications. • Diverting skilled resources away from delivering on the key priority tasks for decarbonisation, e.g. offshore wind, new nuclear, carbon capture. <p>Comment that the Rochdale envelope is not compliant with the requirements of Advice Note 9</p>	<p><i>Government’s clarification that it is not planning to change the classification of agricultural land in ways which would constrain the expansion of the UK’s solar capacity”.</i></p> <p>In terms of excess renewable supply, the Scheme includes BESS which will store excess energy at peak times, and deliver it to the grid when needed.</p> <p>The location of the Scheme is the result of a comprehensive site selection process that was led by environmental and planning considerations to avoid and minimise impacts as early as possible. Chapter 14: Socio-Economics and Land Use of the ES [APP-045], and section 6.14 and 6.15 of the Planning Statement [EN010142/APP/7.2(Rev02)] identifies existing and proposed land uses near the Scheme, and any effects of replacing an existing development or use of the site with the Scheme or preventing a development or use on a neighbouring site from continuing. The Scheme would not prevent any developments from being constructed, operated or decommissioned, and it is expected that any developments within or near the Scheme can be constructed alongside the scheme, as considered in Chapter 18: Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev02)]. There have been no proposals for tree planting or restoration of peatlands within or in proximity to the Scheme. In addition, the Applicant notes that the Scheme also includes tree planting as part of its proposals.</p> <p>The Grid Connection Statement [APP-214] confirms that the Applicant has received a grid connection offer from National Grid Electricity System Operator Limited (NGESO) to connect the Scheme to the NETS.</p> <p>Solar, as identified in the BEIS Report, and NPSs is urgently required to meet the Government’s target of 70 GW of solar capacity to be installed by 2035. The jobs created by the Scheme will be in the renewable energy sector, specifically relating to solar installation, but also electricity transmission. As such, they will contribute to the development of skills needed for the UK’s transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener (Ref 1-7). The indirect jobs include those created within the supply chain and therefore reflect the opportunities for low carbon industries to contribute to the Scheme.</p> <p>The ‘Rochdale Envelope’ approach has been applied within the EIA in accordance with the Planning Inspectorate’s Advice Note 9 (Ref 1-13) to ensure a robust assessment of the likely significant environmental effects of the Scheme. This involved assessing the maximum (and where relevant, minimum) parameters for the elements of the Scheme where flexibility needs to be retained, recognising that the worst-case parameter for one technical assessment may differ from another. Where this approach is applied, this has been confirmed within the relevant chapters of the ES. As is relevant for each technical discipline, the worst-case parameters for the Scheme, under the Rochdale Envelope approach, have been assessed in order to predict likely worst-case overall impacts for that topic. These have been used in the assessment of significance of effects for the Scheme. Each of the technical assessments (Chapters 6 to 17 of the ES [APP-037 to APP-050]) describe the parameters applied in relation to the assessment. As the Scheme design has evolved, key elements of the design have been fixed (e.g. the setting back of the Order limits from residential properties and ecological receptors, where feasible). However, flexibility has been maintained for some</p>

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				<p>aspects of the Scheme within the Application. Where flexibility has been retained in the Application, any subsequent changes to design details will remain within the likely worst-case parameters assessed in the ES in line with the Rochdale Envelope approach.</p> <p>In line with the Planning Inspectorate's Advice Note 9, the Rochdale Envelope approach has been explained clearly for the purpose of consultation and publicity at the pre-application stage; the ES explains fully how the flexibility sought has been taken into account in the assessments and why it is required; and there is consistency across the Application documents.</p>
Alternatives				
REP2-028, REP2-035	7000 Acres	Rooftop solar	Comment that a surge in ground-mounted solar will lead to overprovision without considering rooftop solar and that rooftop solar is preferable as there is untapped potential	<p>In order to meet the Government's target of 70 GW of solar capacity to be installed by 2035, renewable energy generation including from solar is urgently needed, which is made reflected by paragraph 2.10.10 of NPS EN-3 which reports the British Energy Security Strategy which states that an increase in combined ground and rooftop solar deployment by 2035 (up to 70GW) is expected. Under the current system, it is up to developers to contribute to meeting this need, with large scale ground mounted solar being able to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. Whilst rooftop solar is also likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Scheme.</p> <p>The Applicant has provided a response to comments relating to rooftop solar in Table 2-2, page 7 of the Applicant's Response to Written Submissions at Deadline 1 [REP2-007].</p>
REP2-028	7000 Acres	Alternative energy sources	Comment that it is important to consider alternatives for generating the energy desired and that attention should be given to how other options could better utilise land and minimise negative impacts, including wind.	<p>The Applicant has responded to comments relating to alternative electricity generating methods in the following sections of the Applicant's Response to Relevant Representations [REP1-028]:</p> <ul style="list-style-type: none"> • Table 2-4, RR Ref No. RR-303, page 192. • Table 2-4, RR Ref No. RR-094, page 194. <p>and Paragraphs 3.2 to 3.13 on pages 7 and 8 of the Written Summary of the Applicant's Oral Submission at the Open Floor Hearing 1 [REP1-047].</p> <p>These documents set out the position as discussed in the Statement of Need [APP-210], which is that the Applicant recognises that decentralised energy generation on roof tops, offshore wind, onshore wind, nuclear, combined cycle gas turbines (CCGT) and carbon capture, utilisation, storage (CCUS), hydrogen, biomass and air source heat pumps have an important role to play in decarbonisation. However, whilst these forms of energy generating methods are likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource (i.e. solar irradiance), where land is available and suitable (i.e. of an appropriate size and</p>

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				topography), and in proximity to available grid connection locations, such as the area local to the Scheme.
REP2-028	7000 Acres	Alternative locations	The Applicant has failed to identify previously developed land, brownfield land, contaminated land, or industrial land for the proposed development	<p>The Applicant has provided a response to comments relating to the consideration of alternative sites for the Scheme in the following sections of the Applicant's Response to Relevant Representations [REP1-028]:</p> <ul style="list-style-type: none"> • Table 2-22, page 300 • Table 2-4, RR Ref No. RR-001, page 220, 225 and 226 <p>These sections confirm that the Applicant has set out its rationale for selecting the Principal Site and Cable Route Corridor in Chapter 4: Alternatives and Design Evolution of the ES [APP-035]. This explains the stages and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Principal Site this has included seeking to avoid environmental and land use constraints and taking into consideration other criteria such as network connection; topography; field pattern and arrangement; land use conflict, as well as land availability including the availability of brownfield land. In accordance with NPS EN-1 (Ref 1-4) paragraph 5.11.3 and NPS EN-3 (Ref 1-5) paragraph 2.10.29, the Applicant considered the use of previously developed (i.e. brownfield) land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. The Applicant has also taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Cottam Substation the Applicant did not identify any alternative sites which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives.</p>
Cumulative Effects				
REP2-028, REP2-033	7000 Acres	Cumulative effects	Concerns over the cumulative effects of the Scheme and that this has not been considered against the other 4 solar schemes in the area	The Applicant has provided responses relating to the cumulative impacts of the Scheme and other solar projects in Table 2-20 on page 292 of the Applicant's Response to Relevant Representations [REP1-028] .
REP2-028	7000 Acres	Political agenda	Comment that the political agenda to achieve zero carbon electricity sooner might diminish the time available for the Secretary of State to consider the cumulative impacts of this Scheme in combination with neighbouring solar schemes.	The timing for the examination, Examining Authority's recommendation report and the Secretary of State's decision as part of the DCO process is set out on the Planning Inspectorate's website, and must be in accordance with sections 98 and 107 of the Planning Act 2008 (Ref 1-9). As part of the DCO process, the Examination phase may take up to six months where careful consideration is given by the Examining Authority to all the important and relevant matters including cumulative effects. The Examining Authority must prepare a report on the Application to the relevant Secretary of State, including a recommendation, within three months of the close of the six month Examination stage. The relevant Secretary of State then has a further three months to make the decision on whether to grant or refuse development consent. It is up to the Secretary of State to determine how long it takes them to make a decision on the Scheme. Even if a decision is taken more quickly than the three months allowed, the Secretary of State is still required to take such a decision in accordance with the requirements of the Planning Act 2008 and the relevant NPS, as well as considering other relevant and important considerations.

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				<p>The cumulative effects and inter-relationship of each project (Gate Burton Energy Park, Cottam Solar Project, West Burton Solar Project and the Scheme) have been considered within each Environmental Statement chapter and through the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [EN010142/APP/7.6(Rev01)] that was submitted as evidence into each examination of the other solar projects and this Scheme. In view of the above, all four projects have considered the impact of each project in combination with the other. The Secretary of State, in granting development consent for both the Gate Burton Energy Park [EN010131] and the Cottam Solar Project [EN010133] confirmed that the applicants in those projects had adequately assessed the likely significant effects of the proposed developments cumulatively with the other planned developments. In reaching a decision on the Scheme, the Secretary of State has sufficient information to consider cumulative effects of the Scheme in combination with the other solar DCOs. The Applicant expects the ExA and Secretary of State to take the findings of the cumulative assessment into account in their decision making, along with consideration of the recent decisions (Gate Burton Energy Park [EN010131] and the Cottam Solar Project [EN010133]) as important and relevant matters in their decision making.</p>
REP2-028	7000 Acres	Cumulative assessment	<p>Comment that the cumulative impacts assessment is not logical or balanced and fails to account for the generational change of land use from current rural farming to a solar industrial landscape</p>	<p>The Applicant disagrees that the cumulative impact assessment is not logical and balanced and that the cumulative change of use from rural farmland to solar use is appropriately assessed at paragraphs 18.7-18.18 of Chapter 18: Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev02)]. The approach to the cumulative impact assessment in Chapter 18: Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev02)] aligns with those of the Gate Burton Energy Park [EN10131] and the Cottam Solar Project [EN10133]. The ExA and the Secretary of State in granting development consent for the Gate Burton Energy Park and the Cottam Solar Project have already examined and concluded on cumulative effects and the approach taken in the respective cumulative assessments. With regards to the Cottam Solar Project, the ExA conclusion on cumulative matters at paragraphs 3.13.30 of the recommendation report states:</p> <p><i>“We are satisfied that the Applicant has adequately assessed the likely significant effects of the Proposed Development cumulatively with other planned development and that the Environmental Statement includes sufficient information on how the effects of the proposal would combine and interact with the effects of other development during construction, operation and decommissioning. Accordingly, we are satisfied that the requirements of the EIA Regulations, 2011 NPS EN-1 and 2024 NPS EN-1 are met.”</i></p> <p>The SoS confirmed at paragraph 7.3 of his decision letter in relation to the Cottam Solar Project that he agreed with the ExA’s conclusions in respect of cumulative effects.</p> <p>Furthermore, as with the respective cumulative assessments of the Cottam Solar Project and Gate Burton Energy Park, the Scheme’s cumulative effects assessment duly considers the potential cumulative effects associated with land use change as relevant throughout the lifetime of the Scheme.</p>

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				Whilst each development consent is considered on its merits, the consideration of the approach to the cumulative effects assessment, and the cumulative effects established, as part of the recent approval of development consent for the Gate Burton Energy Park and the Cottam Solar Project are important and relevant in the consideration of the Scheme.
Socioeconomics, Land Use, Health and Wellbeing				
REP2-028	7000 Acres	Land use	Concerns over the effectiveness of land use for large ground mounted solar energy	The Applicant has provided a response to comments relating to efficiency and effectiveness of solar in Table 2-22 on page 298 of the Applicant's Response to Relevant Representations [REP1-028] . The Applicant has also produced a technical note on generating capacity and associated development at Appendix B of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-046] which sets out the effectiveness of land use for the Scheme.
REP2-028	7000 Acres	Community benefit	Comment that there is no net benefit to the community from this Scheme and especially when considered in proximity to the other schemes	<p>The Scheme stands to contribute towards the local economy and supply chain, and this includes through the provision of jobs (both directly and indirectly) in the local area. The Applicant has considered a series of measures designed to maximise such local benefits. Further detail is provided in the Framework Skills, Supply Chain and Employment Plan (FSSCEP) [APP-232].</p> <p>The Applicant has also considered a community benefit package as part of the Scheme. It is recognised that projects like the Tillbridge Solar Project can be disruptive to those living and working closest to the Order limits. The Applicant has engaged with both the Lincolnshire and Nottinghamshire community foundations and, should the Scheme receive development consent, the Applicant would provide a community benefit package, and those discussions would be had outside of the DCO process.</p>
REP2-021	7000 Acres	Land use	Comment on the failure to recognise the value of local amenity features such as PRoW in Chapter 14: Socioeconomics and Land Use of the ES [APP-045]	Chapter 11: Human Health of the ES [APP-042] provides an assessment of the Scheme's impact on PRoW in relation to local amenity and health and wellbeing, and it is here that these issues are recognised and assessed. Chapter 11: Human Health of the ES [APP-042] acknowledges that supporting physical exercise is a key local health priority, as set out in local health strategies. It states that due to the location of the Principal Site in rural Lincolnshire, there is limited footway provision in the surrounding area, and there are no dedicated cycle routes. Paragraph 11.8.23 recognises that activities related to the construction phase of the Scheme, such as temporary closures, diversions or amenity impacts on PRoW or impacts on the local road network, which are used by cyclists and pedestrians, may impact on journeys made by active travel modes, which could therefore have an impact on human health. Paragraph 11.8.28 and 11.8.29 conclude that given the medium-term duration of the impacts to PRoW (24 month construction period), the minimal change in quality of life that could arise for cyclists and pedestrians affected by increased traffic flows, and the rapid reversal in the effect once the construction phase is completed, as well as the addition of two permissive pathways, overall, the likely effect on human health arising from impacts on walking and cycling during the construction phase of the Scheme is not significant.

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REP2-021	7000 Acres	Study area	Comment that the study area set out in Chapter 14: Socioeconomics and Land Use of the ES [APP-045] is too broad masking socio-economic difficulties of Gainsborough, West Lindsey and Bassetlaw.	<p>The potential for the Scheme to have adverse effects on residents, particularly in respect of deprivation, is principally considered in Chapter 11: Human Health of the ES [APP-042]. Relevant determinants to deprivation considered in this assessment include.</p> <ul style="list-style-type: none"> • Community connectivity including access to services, facilities (including open space) and employment; • Employment and income; • Air quality; • Noise and vibration; and • Landscape and Visual amenity. <p>As stated in Chapter 11: Human Health of the ES [APP-042] the Study Areas are based on the extent and characteristics of the Scheme and the communities/wards directly and indirectly affected by the Scheme. Based on this, it is determined that Human Health impacts are likely to occur in an area which is composed of the following five wards:</p> <ul style="list-style-type: none"> • Rampton and Sturton wards in Bassetlaw District; and • Lea, Stow and Torksey wards in the West Lindsey District. <p>These five wards have been stated as the Study Area for the Human Health assessment as these are likely to experience direct impacts from the proposed Scheme, being located within the planned footprint of the development. Impacts that occur beyond this are also addressed within the assessment itself, as the Human Health assessment draws upon the findings of supporting chapters to inform its conclusions. These chapters have their own Study Areas for their own individual assessments, which vary in their extent. Each chapter also sets out mitigation measures relevant to their individual disciplines, such as management plans. Each of these chapters also includes a baseline analysis section, which includes a review of the existing surrounding area.</p> <p>As stated in Chapter 11: Human Health of the ES [APP-042], “<i>Embedded mitigation measures are incorporated and secured into the Scheme as set out in the respective ES chapters to reduce other construction, operational and decommissioning effects, such as noise and vibration, air quality, transport and access and socio-economics and land use</i>”. This will in turn mitigate the effects on the local community and existing facilities from a Human Health and Wellbeing perspective.</p> <p>In terms of disruption during the construction and operational phase and in recognition of the potential for impacts on mental health that could arise from activities on site, and surroundings, there are measures set out in the Framework CEMP [EN010142/APP/7.8(Rev02)], Framework OEMP [EN010142/APP/7.9(Rev02)] and Framework DEMP [EN010142/APP/7.10(Rev02)] to reduce or avoid human health and wellbeing related impacts during the construction and operational phase, respectively. The Applicant will work with the Local Authorities to ensure that the local community is affected as little as possible, whether that be targeting contractors with social value commitments during construction or wider community benefit initiatives.</p>
REP2-021	7000 Acres	Assessment	Concern that the assessment results of Chapter 14: Socioeconomics and Land Use of the ES	The Applicant has undertaken a comprehensive and robust Environmental Impact Assessment so that any likely negative impacts of the Scheme can be identified, and likely

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			[APP-045] undermine the scale and scope of negative impacts	<p>significant effects can be identified and mitigated, which is presented in the Environmental Statement (ES) [APP-031 to APP-209]. As referred to in Chapter 1: Introduction of the ES [APP-032], the EIA was carried out by AECOM on behalf of the Applicant. AECOM is an IEMA Registered Impact Assessor and holds the IEMA EIA Quality Mark as recognition of the quality of AECOM's EIA product and continuous training of their environmental consultants. Appendix 1-3: EIA Statement of Competence of the ES [APP-053] outlines the relevant expertise or qualifications of the experts at AECOM who prepared the ES. The Applicant considers the EIA undertaken for the Scheme as presented within the ES and ES Addendum [AS-057] is robust. It is worth noting that the Planning Inspectorate, in deciding to accept the Application for examination, has not raised concerns with the adequacy of the ES provided.</p> <p>Chapter 14: Socio-economics and Land Use of the ES [APP-045] provides a holistic and robust assessment of the scale and scope of effects, taking into account the residual effect assessment results of the air quality, noise, traffic and visual assessments. Section 11.8 of Chapter 11: Human Health of the ES [APP-042] assesses potential effects of the Scheme on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution).</p>
REP2-021	7000 Acres	Employment	Concern over loss of jobs from agriculture and lack of new jobs created	The Applicant has provided responses to concerns relating to impacts on agricultural employment and the local economy in Table 2-3, RR Ref No. RR-292, on page 136 to 139 of the Applicant's Response to Relevant Representations [REP1-028] .
REP2-021	7000 Acres	Policy	Concern over the compliance of scheme with local plan objectives and policies relating to socio-economics and health	<p>As set out in Table 2-23, page 303 of the Applicant's Response to Relevant Representations [REP1-028], the Applicant has provided a response to concerns relating to concerns over the compliance of the Scheme with local plan policies and objectives.</p> <p>Appendix B of the Planning Statement [EN010142/APP/7.2(Rev02)] provides an assessment of the Scheme against local planning policy. Table 2 of Appendix B sets out how the Scheme accords with the Central Lincolnshire Local Plan (Ref 1-14) and Tables 10, 11 and 14 sets out how the Scheme accords with policies in the relevant neighbourhood plans.</p> <p>It is noted that the Local Plans for Lincolnshire, West Lindsey, Bassetlaw and Nottinghamshire do not provide the primary framework for assessing large-scale solar developments. The Scheme comprises a generating station with a capacity of more than 50MW. As such, the Scheme is defined as a National Significant Infrastructure Project (NSIP) under Section 14(1)(a) and 15(2)(c) of the PA 2008 (Ref 1-9). This means that development consent is required for the Scheme and in deciding the Application, in accordance with Section 104(2) of the PA 2008. This confirms that the primary policy consideration for the assessment of NSIPs is the relevant national policy statement, which in this case are the adopted Energy National Policy Statements.</p>

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REP2-021	7000 Acres	Impacts to business	Concerns over lack of information on the impact to business	<p>An appropriate and proportionate assessment of effects on businesses has been undertaken in relevant sections of the ES. There would be no direct land take from businesses as a result of the Scheme, except in regard to use of agricultural land by farm businesses. As set out in section 15.8 of Chapter 15: Soils and Agriculture of the ES [APP-046], management of the land during operation stands to create job opportunities. The assessment of effects on farm businesses takes this in to account. It also assesses that there would be beneficial effects for the majority of farm businesses within the Principal Site from the diversification of land use and income.</p> <p>Chapter 14: Socio Economics and Land Use of the ES [APP-045] states that during construction, the Scheme will support, on average, 914 net additional jobs per annum. Of these, 138 jobs per annum are expected to be taken up by residents within a 60-minute drive time area, and 776 by people outside this area. The jobs created will be in the renewable energy sector, specifically relating to solar installation, but also electricity transmission. As such, they will contribute to the development of skills needed for the UK's transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener (Ref 42). The indirect jobs include those created within the supply chain and therefore reflect the opportunities for low carbon industries to contribute to the Scheme.</p> <p>The capacity of local accommodation facilities such as local hotels, bed and breakfasts and private rented accommodations has also been assessed against the demand from the potential construction workforce. In a worst-case scenario, where 690 workers based outside of a 60-minute drive time area will require accommodation, there is still considered to be a surplus of 2,689 rooms available in local hotels and bed and breakfast accommodations, meaning there is a sufficient local supply to facilitate all construction workers with accommodation if required. This is assessed as a negligible effect which is not significant.</p> <p>The Applicant has also further prepared a technical note, Tourism Assessment in Appendix D of the Applicants Response to Local Impact Reports [EN010142/APP/9.26] to assess the likely impacts of the Scheme on tourism and recreation during the construction and operational phases. Impacts during decommissioning are likely to be similar to those associated with the construction phase. In summary, the assessment concludes that the effects are not significant.</p> <p>In respect of indirect impacts on businesses which could occur in respect of access and delay, a robust construction management plan will be implemented, with due consideration to be given to the management of construction traffic both in terms of the impact of vehicle movements upon the highway network and highway network users including local businesses to minimise delays and disruption. The Applicant has set out details of its approach to managing impacts from construction in the Framework Construction Traffic Management Plan [EN010142/APP/7.11(Rev03)], the approval and implementation of which is secured via a requirement to the DCO. As a result no impacts are anticipated and no associated economic costs are expected.</p>
REP2-021	7000 Acres	Farming circumstance	Concern over lack of engagement with agricultural occupants and over the integrity of the assessment of farming circumstances	<p>Section 42(1)(d) of the Planning Act 2008 requires the Applicant to consult each person who is within one or more of the categories set out in Section 44 of the Planning Act 2008. This requires the Applicant to consult with landowners, lessees, tenants or occupiers (Category 1</p>

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<p>persons); those with an interest in the land or have a power to sell and convey the land or release the land (Category 2 persons); and those who the Applicant thinks would or might be entitled to make a relevant claim (Category 3 persons).</p> <p>The Category 1 interests were identified via a diligent inquiry process. Once the proposed Order limits were established Land Registry data was used to create land ownership parcels and obtain title information. Title information was verified using 'land interest questionnaires'. These were issued to all land interests within the Order limits and asked landowners to confirm the information taken from the Land Registry was correct and to obtain any additional information from those not identified through the Land Registry.</p> <p>Where land interest questionnaires were not returned, direct contact was sought with the owner or occupier of the property, this included phone calls, an email and a follow-up site visit. Where land interests could not be identified, site notices were erected on the land to request ownership information and to signpost to contact details for the project team. These were left in place and monitored for a minimum of six weeks unless the land interest was confirmed.</p> <p>The Category 2 interests were identified using the same methodology via: title information, requests for information, site visits, and collaboration with the wider project team to identify any interests not identified through the land referencing process.</p> <p>As part of the diligent inquiry process, Land Registry data was refreshed at regular intervals to identify new interests. Where new interests were found, land interest questionnaires were issued and the process outlined above was followed to verify their details.</p> <p>Through diligent inquiry, the Applicant confirmed that there are no persons who might be entitled to make a relevant claim as a Category 3 interest in relation to noise, vibration, smells, smoke or light emissions.</p> <p>Therefore, all agricultural occupants were approached to provide farming circumstances baseline data. The Applicant has not misrepresented the information provided or the opinions expressed by any of the agricultural occupants.</p>				

Solar Energy and Efficiency

REP2-028	7000 Acres	Efficiency	<p>Comment that the Scheme only has limited short term energy storage and produces intermittent energy generation. This fails to address the intermittency and flexibility issues needed to balance the energy system</p>	<p>The Scheme incorporates a DC-coupled Battery Energy Storage System (BESS) designed to address both the intermittency of solar generation and provide flexibility to the energy system. While the BESS offers what may be considered short-term storage, it plays a critical role in grid stabilisation by storing excess energy generated during peak solar production and discharging it during periods of higher demand or reduced generation. This functionality directly supports the efficient use of renewable energy, helping to mitigate the variability inherent in solar power generation. By delivering immediate and responsive energy when needed, the BESS significantly enhances the reliability and flexibility of the system. This is reflected in paragraphs 3.3.25 – 3.3.27 of NPS EN-1 (Ref 1-4) where storage is referenced as playing a key role in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated (with paragraph 3.3.28 also acknowledging that many storage facilities currently being deployed provide storage over a period of hours rather than prolonged periods).</p>
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				<p>It is important to recognise that both short-term and long-term energy storage solutions are essential for a resilient energy system. While long-term storage technologies address seasonal or prolonged imbalances in supply and demand, short-term storage, such as the BESS in this Scheme, is indispensable for managing daily fluctuations and enabling the integration of renewable energy into the grid. Together, these technologies complement one another, ensuring that the energy system operates efficiently, reliably, and with the flexibility needed to transition to a low-carbon future. The proposed development is therefore a vital component of this broader strategy.</p>
REP2-028	7000 Acres	Efficiency	Solar is more efficient on low voltage systems like households and rooftop panels prevent the need for electricity system modifications	<p>Ground-mounted solar panels are generally considered more efficient than rooftop solar panels because they can be angled to optimize energy output and operate at lower temperatures. The latter is due to the free airflow beneath ground-mounted panels, which helps dissipate heat, whereas rooftop panels heat up more quickly due to limited ventilation. Additionally, a ground-mounted scheme of this size benefits from economies of scale, making it significantly more cost-effective. Such large-scale installations also simplify the operation of the transmission and distribution grid, as they involve fewer connection points compared to millions of smaller residential systems. This reduces the strain on the grid, which is not currently designed to handle a vast number of prosumers feeding electricity back into the system.</p> <p>The Applicant has outlined how smaller scale solar, including rooftop solar, is not likely to deliver sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets, at Table 2-23 page 203 of the Applicant's Response to Relevant Representations [REP1-028].</p> <p>The Scheme has been designed to deliver an efficient use of land whilst maximising the generation of electricity in accordance with the export/import agreement with NGET, in view of the critical national priority to deliver renewable energy projects to meet legally binding targets to decarbonise the generation of electricity by 2035. The Scheme is capable of transferring over 500MW of renewable energy to the grid at any one time and therefore a connection directly to the National Grid Cottam Substation is deemed to be the most feasible and effective way to harness the power generation as opposed to the utilisation of rooftops.</p>
REP2-028	7000 Acres	Need	Comment that the applicant has created their own need through their preference and selection of scheme design which is not the same as a genuine need.	The need for the Scheme is established by NPS EN-1 (Ref 1-4) which states that there is a critical national priority (CNP) for new nationally significant low carbon and renewable energy infrastructure, which includes solar development. The Applicant has set out the relevant Government policy, legislation and guidance which identifies the urgent need for deployment of solar within its Statement of Need [APP-210] ,
REP2-035	7000 Acres	Need	Concerns that the alternative benefits and need for the land for other purposes outweighs that of the value brought by the solar farm.	The land which the Scheme is located on is currently used for agriculture. The Applicant has provided responses to concerns relating to impacts on agricultural land and food security in Table 2-16, pages 285 to 287 of the Applicant's Response to Relevant Representations [REP1-028] .

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				<p>The Applicant has considered the benefits and use of the existing land in its assessment in Chapter 15: Soils and Agriculture of the ES [APP-045] and Chapter 14: Socio-economics and Land Use of the ES [APP-046], and concludes no significant adverse effects.</p> <p>Chapter 4: Alternatives and Design Evolution of the ES [APP-035], sets out the site selection process for the Principal Site, which illustrates how the site selection process sought to avoid and minimise conflicts with land required for alternative uses allocated in development plans (housing and employment) including the Cottam Priority Regeneration Area, considered the suitability and availability of previously developed land as part of the site selection process and ensured the protection of sites designated for their environmental value. The Scheme would not prevent any developments from being constructed, operated or decommissioned, and it is expected that any developments within or near the Scheme can be constructed alongside the scheme, as considered in Chapter 18: Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev01)].</p>
REP2-028	7000 Acres	Capacity	<p>Comment that ground-mounted solar farms can be directly connected to the electricity distribution grid pylons, avoiding the need for further networks of high voltage connections, and that there is no need to use 500MW 400kV connections at Cottam and West Burton for solar development. It is only the massive aggregation of panels that the developers have pursued to match an unnecessary 500MW, 400kV grid connection capacity, that has driven the colossal use of land.</p>	<p>While a ground-mounted solar farm could connect to the electricity distribution grid, this does not mean it would require less land, as the same amount of infrastructure would still be needed to generate the required capacity. Connecting to the transmission grid, however, ensures a more efficient integration of large-scale renewable energy, helping the nation as a whole to meet its net-zero and energy security targets.</p> <p>As noted above, the scale of the Scheme responds to delivering efficient use of land whilst maximising the generation of electricity in order to provide large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency. The connection directly to the National Grid Cottam Substation is deemed to be the most feasible and effective way to harness the power generation delivered by the Scheme in providing this national benefit.</p>
Agricultural Land				
REP2-028	7000 Acres	Impact on agricultural land	<p>Comment that the applicant has not considered the wider impacts of using agricultural land which there is a preference against using in EN-1</p>	<p>The Applicant has responded to comments relating to the impacts of using agricultural land, and why it is justified for the Scheme, in Table 2-16, pages 285 to 287 of the Applicant's Response to Relevant Representations [REP1-028], and Table 2-3, pages 21 to 23 of the Applicant's Response to Written Submissions at Deadline 1 [REP2-007].</p>
REP2-028	7000 Acres	Use of agricultural land	<p>Comment that the use of agricultural land should be avoided where possible and the applicant has not made a case for the necessity of using agricultural land at this scale</p>	
REP2-024	7000 Acres	Data errors	<p>Concerns that there are a very serious number of errors and inconsistencies within Appendix 15-2 Agricultural Land Classification Baseline Report of the ES [APP-116] and that parties have failed</p>	<p>The Applicant is confident in the reliability of the data within the ALC assessment. Natural England retain a number of ALC specialists and the ALC assessment, including the data presented in the ES, has been reviewed by Natural England. Natural England have not raised any concerns regarding the errors and inconsistencies of the ALC assessment provided by the Applicant. The Applicant has prepared a Statement of Common Ground with</p>

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			in their professional duties as data has not been checked before publication	Natural England which sets out these discussions: Statement of Common Ground with Natural England [EN010142/APP/9.18(Rev01)] .
REP2-024	7000 Acres	Data errors	Comment that the report contains areas which are no longer contained within the Order limits, so call for this to be revised and re-presented.	It is not a data error to present all of the data from the detailed ALC survey of the original area of interest. Presentation of data from sample points that now fall outside of the Order limits does not modify in any way the data from sample points inside the Order limits.
REP2-024	7000 Acres	Data errors	Comment that 7000 Acres conducted an independent internet AI review of the Scheme and these results differ from the original ones (see table in report for full details)	The Applicant is confident in the reliability of the data within the ALC assessment. Natural England retain a number of ALC specialists. The ALC assessment including the data presented in the ES has been reviewed by Natural England. Natural England have not raised any concerns regarding the errors and inconsistencies of the ALC assessment provided by the Applicant. The Applicant has prepared a Statement of Common Ground with Natural England which sets out these discussions: Statement of Common Ground with Natural England [[EN010142/APP/9.18(Rev01)] .
REP2-025	7000 Acres	Pits and boreholes	Concerns over wrong indication of observation points raising question over accuracy of recording	<p>The detailed ALC survey (Appendix 15-1: Agricultural Land Classification Baseline Report of the ES [APP-116]) found large areas with soils displaying little to no variation in physical characteristics relevant to ALC grade. This being the case it is to be expected that the auger boring data recorded (that is specific to ALC assessment) is identical to other sample points where the same soil type is found.</p> <p>The ALC Surveyor, Soil and Environment Services, placed a number of subsoil inspection pits as part of the detailed ALC assessment. The pits marked with a symbol on the plan were the deeper pits to examine soil structure down into the subsoil. The larger number of additional pits recorded with a 'P' in the data log but not a symbol on the plan, were shallower, into the upper subsoil but not deeper into the lower subsoil.</p>
REP2-025	7000 Acres	Soils	Concerns over the results of soil analysis which prove inadequate in terms of yield and concerns over long term damage to soil structure and drainage	The laboratory soil analysis carried out is appropriate to the assessment of ALC grade. Yield, however that is expressed, is not a factor in the assessment of ALC Grade. The ALC Guidance (ref 15-2 in [APP-046]) is clear in the introduction (page 8, point No. 4) that <i>"The grading does not necessarily reflect the current economic values of land, land use, range of crops, suitability for specific crops or level of yield. For reasons given in the preface, the grade cut-offs are not specified on the basis of crop yields as these can be misleading, although in some cases crop growth may give an indication of the relative severity of a limitation."</i>
REP2-033	7000 Acres	Soils	Comment that the Applicant has not taken note of recent research by the Welsh Government that demonstrates solar schemes have a detrimental effect on soil health. Following decommissioning it is likely that BMV land will be downgraded due to the damage caused, therefore it will be permanently lost.	The Wales Government report (Work Package Three SPEP2021-22/03) (Ref 1-15) does not support the claims made by 7000 Acres. This report reviews existing literature on soil compaction but relies upon research that predates any solar farm development (Hakansson et al 1988 (Ref 1-16) & Spoor 2006 (Ref 1-17)) that concentrates on 'industrial compaction'. In contrast to industrial compaction that can include earth moving and the establishment of permanent foundations, the solar farm deployment work will involve plant smaller and with lower ground pressure than standard agricultural machinery, with work suspended when soils have wetted to a plastic consistence – a measure that farm management is frequently unable to apply given the limited window of opportunity for time critical operations such as sowing and harvest.

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				The change of use from predominantly intensive arable farming to semi-improved grassland across the Order limits will be beneficial to the structure and quality of soils, making it suitable for reversion to agricultural use/food production.
REP2-029	7000 Acres	Food security	Concerns over food security and need to use land for energy generation over food production	The Applicant has responded to comments relating to the impacts of using agricultural land and food security in Table 2-16, pages 285 to 287 of the Applicant's Response to Relevant Representations [REP1-028] , and Table 2-3, pages 21 to 23 of the Applicant's Response to Written Submissions at Deadline 1 [REP2-007] .
REP2-029	7000 Acres	Land productivity	Concerns over the loss of crop production for the lifetime of scheme and wider negative impacts and energy requirements associated with outsourcing the food which could have been produced at this location	<p>As noted above, the effect of the Scheme on agricultural land with regards to food production has been considered in Section 14.8 of Chapter 14: Socio-economics and Land Use of the ES [APP-045]. This assessment concludes that there are no likely significant effects across the construction and operational phases with regards to food production, considering that the Scheme area forms less than 1% of agricultural land available in Lincolnshire. Land can continue in agricultural production through the operational phase, for example through the grazing of sheep, and following operation the land used for the Scheme can revert to current agricultural management.</p> <p>In planning policy terms there is not a moratorium on the use of agricultural land for solar projects. The Scheme will support existing farming enterprises through diversification of wider landholdings and will not materially impact on food production. Pages 111 and 112 of the Applicant's Responses to Relevant Representations [REP1-028] confirms that the UK is self-sufficient, producing as much food as is consumed. This demonstrates that despite concerns raised regarding the impact on food production that this impact will not be significant.</p>
REP2-029	7000 Acres	Food security in documents	Query as to why there is no mention of Food Security and its impacts in the Tillbridge Solar Project documentation	<p>The Applicant has acknowledged in the Applicant's Response to Relevant Representations [REP1-028] that the National Planning Policy Framework (NPPF) (Ref 1-18) is important and relevant in the determination of the Application. Footnote 62 of the NPPF clarifies that the availability of agricultural land used for food production should be considered when deciding what sites are appropriate for development in addition to using areas of poorer quality land before land of a higher quality. Whilst, at the time of writing, the Application will be considered in the context of the NPPF as relevant, National Policy Statements for Energy (NPS-EN1 (Ref 1-4), NPS EN-3 (Ref 1-5) and NPS EN-5 (Ref 1-11)) under Section 104(2) of the PA 2008 (Ref 1-9) are the primary policy consideration for NSIPs. The focus of the NPSs remains on the use of land with specific tests associated with the use of lower quality agricultural land before higher quality (best and most versatile).</p> <p>In terms of food production, the information provided in pages 111 and 112 of the Applicant's Responses to Relevant Representations [REP1-028] confirms that the UK is self-sufficient producing as much grain, meat, dairy and egg as is consumed. Land use change does not feature among the governments identified risks to UK food security in the most recent UK Food Security Report from Defra (2021). Climate change is, however, highlighted as a key risk to future UK food security. In addition, the Scheme area forms less than 1% of agricultural land available in Lincolnshire.</p> <p>This demonstrates that despite concerns raised regarding the impact on food production, this impact will not be significant. The Application demonstrates that the use of agricultural land for the Scheme is justified, that the impact on best and most versatile land has been</p>

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REP2-019	7000 Acres	Crop yield data	<p>Comment that the developer, Tillbridge Solar Project, should provide an assessment of this topic of Land Productivity with quantifiable data covering:</p> <ul style="list-style-type: none"> a) What crops have been produced in the past? b) What quantity and grade of crops have been produced? c) What percentage of UK production is this? d) Where else are these crops produced that can replace the lost production? 	<p>minimised. The Scheme mainly takes land out of agricultural use for a temporary long-term basis (as it can return to agricultural use post the decommissioning of the solar farm), with only 0.92 hectares of BMV being potentially permanently lost to proposed woodland planting. The Application confirms that the Scheme will not have a material impact on the availability of land for food production, even when considered in combination with other solar NSIP projects in the area. Further, pages 137 and 138 of Applicant's Responses to Relevant Representations [REP1-028] also addresses this point through references to recent decisions on the Gate Burton Energy Park [EN010131] and Cottam Solar Project [EN010133]. The Secretary of State determined in respect of those schemes that the loss of land to food production, should be attributed little negative weight (for example, the Secretary of State's decision on Cottam, paragraph 4.74, where they agreed <i>"with the ExA that this should be classed as "little negative weight" rather than "significant negative weight" in recognition of the point that, whilst the use of arable farmland exceeds NPPF guidance, it is in line with the 2024 NPS"</i>.</p> <p>The National Planning Policy Framework (NPPF) (Ref 1-18) is important and relevant in the determination of the Application. Footnote 62 of the NPPF clarifies that the availability of agricultural land used for food production should be considered when deciding what sites are appropriate for development in addition to using areas of poorer quality land before land of a higher quality. Whilst, at the time of writing, the Application will be considered in the context of the NPPF as relevant, National Policy Statements for Energy (NPS-EN1 (Ref 1-4), NPS EN-3 (Ref 1-5) and NPS EN-5 (Ref 1-11)) under Section 104(2) of the PA 2008 (Ref 1-9) are the primary policy consideration for NSIPs. The focus of the NPSs on the use of land with specific tests associated with the use of lower quality agricultural land before higher quality (best and most versatile).</p> <p>There is no policy requirement within these policy documents to assess the impact of the Scheme on crop yields. Crop yields are highly variable and are dependent on a wide range of factors. Some of these factors are natural and largely uncontrollable.</p> <p>In terms of food production, pages 111 and 112 of the Applicant's Responses to Relevant Representations [REP1-028] confirms that the UK is self-sufficient producing as much grain, meat, dairy and egg as is consumed. Land use change does not feature among the identified risks to UK food security. Climate change is, however, highlighted as a key risk to future UK food security. The Application demonstrates that the use of agricultural land for the Scheme is justified, that the impact on best and most versatile land has been minimised, with the Scheme mainly taking land out of agricultural use for a temporary long-term basis (as it can return to agricultural use after decommissioning) , with only 0.92 hectares of BMV being permanently lost to proposed woodland planting. The Application confirms that the Scheme will not have a material impact on the availability of land for food production, even when considered in combination with other solar NSIP projects in the area. This demonstrates that despite concerns raised regarding the impact on food production, this impact will not be significant.</p> <p>Further, pages 137 and 138 of the Applicant's Responses to Relevant Representations [REP1-028] also addresses this point through references to recent decisions on the Gate Burton Energy Park [EN010131] and Cottam Solar Project [EN010133]. The Secretary of</p>

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				State determined in respect of those schemes that the loss of land to food production, should be attributed little negative weight.
REP2-019	7000 Acres	Agrivoltaics	Comment that the Applicant should explain how they have integrated the concept of "agrivoltaics" i.e. systems in which farmland is effectively combined with solar power. At present all they have quoted in Farming Circumstances 15.8.21 is during operation, grass below and between the solar panels will need to be managed.	<p>The Applicant has integrated agrivoltaics by proposing sheep grazing on the Principal Site. The Framework LEMP [EN010142/APP/7.17(Rev03)] details in a number of paragraphs how the Scheme will provide areas suitable for grazing and when grazing would be carried out during the operational phase of the Scheme (where feasible):</p> <ul style="list-style-type: none"> • The Scheme will provide areas of Semi-improved Grassland, as detailed in Paragraph 8.2.29, which is suitable for grazing; • The Scheme will provide areas of Traditional Orchard, as detailed in Paragraph 8.3.35, which will be underplanted with species-rich grass see mix suitable for grazing; • Paragraph 8.3.36 detailed the proposed establishment of grassland within the Scheme. 8.3.36 (c) indicates that grazing, where feasible, will be utilised in the establishment maintenance of Grassland; • Paragraphs 8.3.37 to 8.3.38 details the proposed long-term management of grassland within the Scheme. 8.3.38 (a) indicates that grazing will be utilised in the management of grassland within the Scheme; and • Paragraph 8.3.40 indicates that low intensity sheep grazing could be used to maintain the grassland within the Sensitive Archaeological Sites. <p>The Applicant reiterates that the Scheme will be implemented in accordance with the Framework LEMP [EN010142/APP/7.17(Rev03)] and implementation of the Framework LEMP [EN010142/APP/7.17(Rev03)] is secured by Requirement 7 of the draft DCO [EN010142/APP/3.1(Rev04)].</p>
Biodiversity				
REP2-023	7000 Acres	Impacts to wildlife	Concerns over the negative impacts to wildlife as a result of the Scheme	<p>The Applicant has provided responses to concerns relating to impacts on biodiversity and wildlife in the following sections in the Applicant's Response to Relevant Representations [REP1-028]:</p> <ul style="list-style-type: none"> • Table 2-5, RR Ref No. RR-139 and RR-276, page 242 to 243; • Table 2-4, RR Ref No. RR-001, page 212 to 213; • Table 2-3, RR Ref No. RR-095, page 166 to 167; and • Table 2-3, RR Ref No. RR-292, page 141 to 142 and 149 to 150. <p>These sections set out details of the assessments carried out in Chapter 9: Ecology and Nature Conservation of the ES [APP-040] and the conclusion that there will be no significant adverse effects on biodiversity, with significant beneficial effects to a variety of habitats, including broad-leaved woodland, running water, hedgerows and species, including breeding birds, particularly farmland birds associated with hedgerows and field margins. They also explain that the Scheme will deliver a minimum 10% gain for biodiversity, as secured by both requirements 7 (landscape and ecological management plan) and 8 (biodiversity net gain) of Schedule 2 of the draft DCO [EN010142/APP/3.1(Rev04)].</p>

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REP2-032	7000 Acres	Noise	Comments relating to the impacts of noise on biodiversity.	Where impacts from noise have the potential to disturb specific biodiversity features these are assessed, as appropriate, in Chapter 9: Ecology and Nature Conservation of the ES [APP-040]. There would be no impacts on any biodiversity features as a result of noise.
REP2-018	7000 Acres	Construction impacts	Concerns over the potential harm that construction traffic may have on existing vegetation and habitats and the material change to the character of the landscape if vegetation is to be removed. Comment that clarity on this issue must be provided for Interested Parties. Members are also concerned regarding safety implications with potential damage being caused to trees and tree roots along roadsides.	<p>Chapter 9: Ecology and Nature Conservation of the ES [APP-040] sets out an assessment of the Scheme's impact on existing vegetation and habitats, and concludes that the Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and decommissioning phases.</p> <p>An Arboricultural Impact Assessment [APP-107], Tree Constraints Plan and Tree Protection Plans in Annex A and C [APP-107 to APP-109] have been submitted with the Application which set out further details of the Scheme's impact on trees.</p> <p>Construction will not result in the loss of valued landscape features such as veteran or ancient trees or areas of high biodiversity: there will be only localised removal of short sections of hedgerow and a small number of low-value trees where this cannot be avoided for access.</p> <p>The Applicant has also taken opportunities to provide mitigation and enhancement measures within the Order limits to increase biodiversity and provide overall net gains in habitat. This means that any loss of vegetation or trees required for the safe passage of construction traffic will be replaced (and further benefit added on top of this). These measures include woodland, scrub and hedgerow planting, encouraging areas to naturally regenerate, establish species rich grassland across the Principal Site, and other habitat restoration and creation within the Order limits. The Scheme therefore delivers a minimum of 10% BNG, and significant beneficial impacts on ecological features and habitats.</p>
REP2-018	7000 Acres	Bats	Comment that surveys for bat activity, foraging, habitats and roosts need to be carried out to include not only the Order Limits but also areas beyond these limits to enable understanding of any potential impacts and therefore be able to mitigate such impacts. Also, the Applicant did not assess roosts for bats inside the Order Limits. Therefore, considering the above evidenced research, we argue that the Applicant has not fully assessed the potential harms to bats and as such their findings are not conclusive.	<p>Table 9-2 of Chapter 9: Ecology and Nature Conservation of the ES [APP-040] sets out the ecological surveys undertaken to aid in characterising the baseline conditions, along with the justification as to the scope and extent of these surveys. Appendix 9-9: Baseline Report for Bats of this ES [APP-090] sets out specifically those surveys taken for bats. These surveys were also supported by an extensive desktop review and incorporation of collaborative datasets from the three solar projects (Gate Burton Energy Park, Cottam Solar Project and West Burton Solar Project) that neighbour, or overlap with, the Order limits. The combination of these data characterised the ecological baseline.</p> <p>All trees and structures within the chosen study area were subject to a ground level assessment for their suitability to support bat roosts as summarised in Table 9-2 of Chapter 9: Ecology and Nature Conservation of the ES [APP-040] and detailed in Appendix 9-9: Baseline Report for Bats of the ES [APP-090]. The results of these surveys informed the parameters secured in the Works Plans [REP2-004], with a 15m buffer applied to any tree or structure with bat roost suitability. Specific measures for avoiding impacts on bats during construction are set out in Table 9-13 of Chapter 9: Ecology and Nature Conservation of</p>

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				the ES [APP-040] and secured through the Framework CEMP [EN010142/APP/7.8(Rev02)] .
Batteries				
REP2-028	7000 Acres	BESS capacity	<p>Concern over the limited information provided as to the technical capacity of the proposed BESS and their use in the electricity market</p> <p>Comment that the 1-2 hours storage capacity of the proposed BESS is unable to contribute to season to season storage issues, diminishing useful energy contribution.</p> <p>Comment that the BESS can make a limited contribution to reducing summer curtailment.</p>	<p>The Applicant would like to clarify that the proposed Battery Energy Storage System (BESS) is not limited to 1-2 hours of capacity, a 4-hour system is proposed. This design ensures a robust level of short-term storage capability, which plays a crucial role in grid stabilisation. The BESS is intended to store excess energy generated during peak solar production periods and discharge it during times of higher demand or reduced generation. This operation supports the efficient use of renewable energy, helping to manage the variability of solar generation and reducing potential curtailment, particularly during summer months. By providing responsive and immediate energy, the BESS contributes meaningfully to grid flexibility and reliability.</p> <p>It is essential to understand that both short-term and long-term storage solutions are necessary components of a resilient and balanced grid. While long-term storage addresses seasonal or prolonged supply-demand imbalances, short-term storage, like the proposed BESS, is vital for managing daily fluctuations, optimising renewable energy integration, and reducing the need for curtailment during high-generation periods. The Scheme, including the BESS, forms part of a broader strategy to enhance grid efficiency and support the transition to a low-carbon energy system by complementing other technologies and infrastructure.</p>
REP2-028	7000 Acres	Associated development	<p>Comment that the BESS has potential to be a valuable trading tool, in balancing the electricity system, but this is not associated development for the CfD-based solar scheme.</p>	<p>While the Battery Energy Storage System (BESS) indeed has the potential to act as a valuable trading tool in balancing the electricity system, this is not its primary purpose within the proposed Scheme. That is why the term "potential" is an important distinction—just because something has the potential for a particular use does not mean it is intended or designed for that purpose.</p> <p>As outlined in the Framework Battery Safety Management Plan [APP-255] the BESS is designed to function as a subordinate component of the generating station. Its primary role is to enhance the benefits of the generating station. Specifically, the BESS supports the solar generating station by storing excess energy during periods of high production and discharging it during times of lower generation or higher demand. This helps maximise the utilisation of renewable energy, reduce curtailment, and provide a degree of flexibility and reliability to the grid. While ancillary market opportunities may exist, they are not the driving factor for the inclusion of the BESS, which is fundamentally integrated into the Scheme to complement and optimise the performance of the solar power plant.</p> <p>In any event, and as set out more fully in the Applicant's Response to the Examining Authority's First Written Questions [EN010142/APP/9.27], written question Q1.1.22, the grid balancing services the BESS may provide address the impacts of the Scheme (and other schemes like it) as required by the core principles required to be considered in order to confirm development is associated development.</p>

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REP2-026	7000 Acres	BESS concerns	Concerns over safety of BESS in general. Comment that no evidence provided as to why a BESS is essential to this development	<p>The consideration of BESS as associated development is set out more fully within Appendix B to the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) [REP1-046].</p> <p>The Applicant has also produced a technical note on generating capacity and associated development at Appendix B of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-046] which explains the role of the BESS in ensuring that energy is captured and stored efficiently during periods of peak generation and can be made available for use throughout the year.</p>
REP2-026	7000 Acres	Thermal runaway	Concerns over the provision of sufficient water to respond to a battery thermal runaway at each BESS location	<p>The evidence supporting the Battery Energy Storage System (BESS) as associated development and justification for it generally is thoroughly detailed in the Statement of Need [APP-210] and Appendix B of the Written Summary of the Applicant's Oral Submissions at ISH1 [REP1-046]. The BESS is not an arbitrary addition but an integral component designed to support and enhance the performance of the solar generating station and to maximise the utilisation of the grid connection itself.</p> <p>NPS EN-1(Ref 1-4) is clear (see paragraphs 3.3.4 – 3.3.6 and 3.3.25 – 3.3.27) as to the need for energy storage and how it can address the impacts of intermittent low carbon energy generation.</p> <p>The Applicant has also produced a technical note on generating capacity and associated development at Appendix B of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-046] which explains the role of the BESS in ensuring that energy is captured and stored efficiently during periods of peak generation and can be made available for use throughout the year.</p> <p>The Framework Battery Safety Management Plan [APP-255] specifies that each BESS Station will integrate pressure fed fire hydrants and / or static water tanks (tanks can be integrated above or below ground) for firefighting. Water provision will be designated for the cooling of adjacent BESS or ESS equipment. Current UK NFCC guidelines stipulate tanks and/or hydrants should be capable of delivering no less than 1,900 litres per minute for at least 2 hours. The firefighting water requirement will be fully assessed at the detailed design stage based upon BESS fire and explosion test data by an independent Fire Protection Engineer and water storage volumes will be agreed with Lincolnshire Fire and Rescue Service (LFR) during the detailed design stage. They must be easily accessible to FRS vehicles and their siting should be considered as part of a risk assessed approach that considers potential fire development / impacts.</p> <p>If the BESS system selected at the detailed design stage does not integrate an internal automatic fire suppression system and is designed to safely burn out to remove the risk of stranded energy in the battery systems, then full scale free burn testing and rigorous site-specific consequence modelling will have been conducted to validate safe equipment spacing distances, ensuring fire will not propagate to adjacent BESS enclosures and should not require intervention from LFR i.e. boundary cooling.</p>

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REP2-026	7000 Acres	Thermal runaway	Comment that emissions from a thermal runaway are not considered in the assessment of unplanned atmospheric emissions	Should an individual cell, within a battery module overheat there is the possibility that it could lead to the cell and other cells failing. There are controls in place to manage the movement of heat between cells and between modules within a single BESS cabinet (the external enclosure). These measures including insulating materials and air spaces, make a thermal runaway unlikely to occur within one cabinet. The unplanned emissions assessment reports the likely impacts that could be expected for a highly conservative scenario, based around a fire consuming all modules within a cabinet.
REP2-026	7000 Acres	Lack of detail	Comment that the design of the BESS lacks the detail required to assess it fully	<p>Table 2-1 in the Framework Battery Safety Management Plan (FBSMP) [APP-255] clearly states the Applicant's commitments to BESS design safety parameters. The Applicant has incorporated international best practice into BESS safety design objectives and the FBSMP.</p> <p>Table 5-1 in the FBSMP [APP-255] lists the key safety standards and best practice documentation currently relevant to UK BESS schemes. Revisions to codes and standards generally work to three-year cycles and the FBSMP stipulates that the Applicant will ensure the final BSMP will incorporate the key safety recommendations and standards applicable at the time of drafting.</p> <p>Section 6 of the FBSMP [APP-255] outlines the Applicant's commitment to site specific Risk Assessments and Emergency Response Planning that will be conducted at the detailed design stage and demonstrate that the selected BESS system and site design / layout ensure risk is as low as reasonably practicable i.e. to ALARP principles.</p>
Statement of Need				
REP2-028	7000 Acres	Solar gain	Comment that the energy contribution of solar in the UK is not adequately described, and the Statement of Need (SoN) attempts to illustrate the region as being one of high solar gain, when it is clear the UK is one of the lowest areas of solar gain, globally.	<p>The Statement of Need (SoN) [APP-210] does not claim that the UK's irradiation levels are high on a global scale. Instead, it emphasises the importance of solar energy as a crucial component in decarbonising the economy and achieving the country's net-zero targets. As explained in Table 2-22 of the Applicant's Response to Relevant Representations [REP1-028] while Lincolnshire's solar irradiation is lower than in Southern Europe, it remains comparable to the rest of Europe.</p> <p>The Applicant recognises that meeting the Government's goals requires a multidisciplinary approach, including contributions from onshore and offshore wind, solar, tidal, nuclear, and both short- and long-term energy storage solutions. Within the UK, site selection focuses on areas with relatively higher irradiation to maximise the efficiency, benefits, and investment potential of solar projects, ensuring the best possible outcomes for the national energy strategy.</p> <p>Paragraph 4.5.5 of Chapter 4 Alternatives and Design Evolution of the ES [APP-035] sets out that irradiation was a consideration when selecting the Principal Site, with the Site for the Scheme chosen due to its location in the east of England because of high levels of irradiation, within the UK.</p>
REP2-028	7000 Acres	Security of supply	Comment that the security of supply benefit derived from "energy diversification" has been overstated, and the fundamentals of how to meet demand with intermittent supply from the	The Applicant does not agree with this comment. Energy diversification, along with reducing dependency on hydrocarbon fuels, is essential for securing the electricity supply and enhancing resilience in the face of fluctuating energy markets. While intermittent energy sources such as solar, onshore wind, offshore wind, and tidal power play a vital role in

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			<p>Scheme have been omitted from the treatment of Security of Supply in the SoN.</p>	<p>achieving national decarbonisation. This is endorsed by national planning policy, which the Secretary of State must have regard to as primary policy for the consideration of the Application given that the energy NPSs have effect. This is explained below.</p> <p>It is government policy for the United Kingdom to achieve security of supply and for this to be delivered using different types of electricity infrastructure. This includes the addition of generating stations, such as the Application, along with electricity storage, interconnectors and the upgrading of electricity networks. Paragraph 3.3.4 of NPS EN-1 (Ref 1-4) states that <i>“none of them will enable us to meet these objective in isolation.”</i></p> <p>NPS EN-1 (Ref 1-4) goes on to explain that all generating technologies are urgently needed, which includes solar technology, to meet legally binding targets to decarbonise the production of electricity generation by 2035 and to be net zero by 2050. Paragraph 3.3.59 of NPS EN-1 (Ref 1-4) states:</p> <p><i>“All the generating technologies mentioned above are urgently needed to meet the government’s energy objectives by:</i></p> <ul style="list-style-type: none"> • <i>providing security of supply (by reducing reliance on imported oil and gas, avoiding concentration risk and not relying on one fuel or generation type)</i> • <i>providing an affordable, reliable system (through the deployment of technologies with complementary characteristics)</i> • <i>ensuring the system is net zero consistent (by remaining in line with our carbon budgets and maintaining the options required to deliver for a wide range of demand, decarbonisation and technology scenarios, including where there are difficulties with delivering any technology).”</i> <p>Since achieving the security of supply through the development of multiple electricity infrastructure and generating stations powered by multiple technologies is enshrined within government policy, it is not possible to overstate this given that it forms a key objective of national policy.</p> <p>Energy yield associated with solar is impacted by many factors, which includes varied irradiance levels during the time of year/seasons. The battery energy storage system (BESS) proposed as associated development to the generating station will maximise energy generated by the solar panels and support the efficiency of the Scheme. The associated BESS will support the variability experienced in electricity generation through storing surplus energy in the batteries and releasing it to the grid when it is needed more due to higher demand. The BESS therefore supports the operation of the generating station. The Statement of Need (SoN) [APP-210] includes consideration of intermittent supply in the context of the co-located BESS in Section 6.11.</p>
REP2-028	7000 Acres	UK’s Capacity Mechanism	<p>Comment that the SoN chooses to state that solar is included in the UK’s Capacity Mechanism, designed to provide sufficient electricity capacity to meet security of supply, but omits the context as to what limited value this means in practice; an expected contribution of</p>	<p>The Statement of Need (SoN) [APP-210] does not reference the "Capacity Mechanism," making it difficult to provide a specific response without further clarification or a reference to the relevant document.</p> <p>Regarding the contribution of 0.06% of peak capacity, it is important to clarify terminology. If the comment refers to peak production or supply of electricity, this is inaccurate, as the peak</p>

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			0.06% of peak capacity, but more likely to be zero.	<p>contribution to the grid is determined by the grid connection itself, which in this case is 500 MW. According to the Department for Energy Security and Net Zero, the UK's total generation capacity in 2023 was 74.8 GW, meaning this Scheme would contribute 0.66%, not 0.06%. While this may appear modest, the scale of energy demand and population in the UK makes most contributions appear small. However, these contributions are substantial on a country and global scale as part of the UK's multidisciplinary approach to energy production.</p> <p>In any respect, the Applicant notes that regardless of the contribution levels set out above, NPS EN-1 (Ref 1-4) and EN-3 (Ref 1-5) clearly establishes the need and critical national priority for solar farms which produce >50MW. The SoN [APP-210] provides greater clarity and information on the particular function of the Scheme as against the national infrastructure and policy framework, but does not change the established need for the Scheme as set out within those NPSs.</p>
REP2-028	7000 Acres	Curtailement	Comment that the SoN does not consider the extent to which the scheme may contribute to creating situations of curtailement on the electricity grid, or the extent to which the scheme will be curtailed.	<p>The Applicant disagrees with this comment, as curtailement is specifically addressed in the Statement of Need [APP-210]. Section 8.4, titled "Curtailement," is dedicated to discussing this topic and outlines the potential for curtailement on the electricity grid as well as the measures in place to manage and mitigate such situations.</p> <p>Furthermore, this is where the case for the BESS comes in to support the generating station, ensuring that if and when curtailement occurs, most of the energy that otherwise may be "lost" could be stored within the associated development. This stored energy could then be discharged during periods without curtailement, aligning with grid demand and further enhancing the efficiency and contribution of the Scheme to the electricity supply.</p>
Equality Impact Assessment and Health				
REP2-032	7000 Acres	Equality Impact Assessment (EqIA)	Comment that the Equality Impact Assessment (EqIA) fails to set out purpose of the EqIA as it is not clear how vulnerable groups are considered properly and reasonable adjustments have been made.	<p>The purpose of the Equality Impact Assessment (EqIA) [APP-227] is established in 'Chapter 1' sub section '1.1 Purpose'. As stated in this section, the purpose of the EqIA is to support the Application by demonstrating that due regard has been had to the needs of protected characteristic groups (i.e. vulnerable groups) in line with the Equality Act 2010 (Ref 1-19) and Public Sector Equality Duty (Ref 1-20).</p> <p>In demonstrating this due regard, the EqIA uses a desk-based methodology that draws on evidence from the Environmental Statement, an equalities baseline and secondary data sources, a legislation and policy review, and consultation activities. Based on the evidence collected from these sources, the assessment provides a consideration of potential direct and indirect equality impacts (both adverse and beneficial) associated with the consultation, construction, operational, and decommissioning phases of the Scheme. Relevant mitigation measures highlighted in the Environmental Statement and Environmental Management Plans are included in relation to potential negative impacts.</p> <p>This approach is considered good practice in supporting DCO applications and is consistent with equivalent EqIAs completed on other NSIP energy developments.</p>
REP2-032	7000 Acres	Social Deprivation	Comment that pockets of social deprivation have not been identified and there has been a lack of	Section 2 of the Equality Impact Assessment (EqIA) [APP-227] outlines the approach adopted for conducting the assessment. Face-to-face engagement with specific groups was

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			face to face engagement with certain groups such as with the travellers site in Odder	not utilised to inform the EqIA and it is noted that no request for its use was made prior to the submission of the DCO Application. It is also noted that there is limited, if any, precedent for undertaking equality specific face-to-face engagement on DCO applications unless a specific request is made prior to the Application being submitted.
REP2-032	7000 Acres	Joint Forward Plan and Core20Plus5	Comment that it fails to recognise the Joint Forward Plan and requirements of Core20Plus5	Section 2 of the Equality Impact Assessment (EqIA) [APP-227] outlines the approach adopted for conducting the assessment. Recognition of the Joint Forward Plan (Ref 1-21) and Core20Plus5 (Ref 1-22) was not utilised to inform the EqIA and it is noted that no request for its use was made prior to the submission of the DCO Application. It is also noted that there is limited, if any, precedent for using these resources on DCO applications. Both resources are understood to have been publicised recently (within the last three years) and borne out of the healthcare sector. Their application in the context of energy infrastructure development is therefore not deemed to be common practice at this time.
REP2-018, REP2-021	7000 Acres	Green space	Concerns over the negative health impacts of losing green space and impact on the character of the area.	The Applicant has provided a response to comments relating to loss of green space in regard to health impacts in Table 2-3, page 148 of the Applicant's Response to Relevant Representations [REP1-028] .
REP2-021, REP2-032	7000 Acres	Health outcomes	Comment that the applicant has not identified how health outcomes could be impacted beyond thinking of health in terms of recreational cycling paths, PROWs and health hazards	<p>The assessment of effects on human health has been reported within Chapter 11: Human Health of the ES [APP-042]. This approach was agreed with the Planning Inspectorate via the EIA Scoping process (refer to Appendix 1-1: EIA Scoping Report of the ES [APP-051] and Appendix 1-2: EIA Scoping Opinion of the ES [APP-052]). The assessment follows the guidance set out within NHS England's Healthy Urban Development Unit's (HUDU) Rapid Health Impact Assessment (HIA) Toolkit 2019 (Ref 1-23)) and the Institute of Environmental Management and Assessment (IEMA) guidance "Determining Significance For Human Health In Environmental Impact Assessment" (Ref 1-24)).</p> <p>Chapter 11: Human Health of the ES [APP-042] assesses potential effects of the Scheme on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect physical and mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities).</p> <p>Additionally, the IEMA guidance (Ref 1-24)) outlines that both physical and mental health should be considered '<i>across the analysis of bio-physical, social, behavioural, economic, and institutional influences on population health outcomes</i>'. Therefore, the assessment within Chapter 11: Human Health of the ES [APP-042], considers mental health as a health outcome within the above listed assessment determinants. The key determinants within the assessment that consider mental health outcomes are noise and vibration and landscape and visual amenity during the construction, operation and decommissioning stages. Chapter 11: Human Health of the ES [APP-042] concludes that there are no significant effects anticipated in relation to mental health. In recognition of the potential for impacts on mental health that could arise from activities on site, and surroundings, there are measures set out in the Framework CEMP [EN010142/APP/7.8(Rev 02)], Framework OEMP</p>

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				<p data-bbox="1573 273 2819 346">[EN010142/APP/7.9(Rev02)] and Framework DEMP [EN010142/APP/7.10(Rev02)] to reduce or avoid human health and wellbeing related impacts.</p> <p data-bbox="1573 378 2819 619">In addition, Chapter 11: Human Health of the ES [APP-042] finds beneficial impacts on employment and income, prioritisation of walking and cycling routes (through new permissive paths) and climate change during operation, which will lead to positive effects on human health, including both physical and mental health. This positive effect provides alignment with the aims and priorities of the Joint Strategic Needs Assessment (Ref 1-25) and the Joint Health and Wellbeing Strategy (Ref 1-26) through improving the provision of service and providing beneficial impacts on the priority areas of mental health and physical activity.</p> <p data-bbox="1573 661 2819 903">No significant adverse effects are identified with regards to human health, which aligns with the stated aims of the JSNA and the Joint Health and Wellbeing Strategy to improve health outcomes. Whilst the Applicant acknowledges the concerns raised in relation to health and well-being, Chapter 11: Human Health of the ES [APP-042] does provide a holistic robust assessment of effects and through sensitive management during all phases of development as well as the Scheme including positive beneficial impacts, the Scheme is in accordance with Policy S54: Health and Wellbeing of the CLLP.</p> <p data-bbox="1573 945 2819 1249">Additionally, the Application is also supported by an Equality Impact Assessment (EqIA) [APP-227]. The EqIA assesses how the Scheme may therefore impact on the health and well-being of protected characteristic groups. It assesses the potential direct and indirect impacts of the Scheme on groups with protected characteristics as defined by the Equality Act 2010 (Ref 1-19). It acknowledges that during construction increased traffic movements have the potential to disproportionality affect some protected characteristic groups, including older and disabled people. It is recognised that noise, vibration, and air qualities could also affect these groups. During operation of the Scheme potential impacts include negative effects of increased noise on protected characteristic groups such as disabled people.</p> <p data-bbox="1573 1291 2819 1491">As stated in Chapter 11: Human Health of the ES [APP-042], <i>“Embedded mitigation measures are incorporated and secured into the Scheme as set out in the respective ES chapters to reduce other construction, operational and decommissioning effects, such as noise and vibration, air quality, transport and access and socio-economics and land use”</i>. This will in turn mitigate the effects on the local community and existing facilities from a Human Health and Wellbeing perspective including protected characteristic groups.</p> <p data-bbox="1573 1533 2819 1627">The Applicant will work with the Local Authorities to ensure that the local community is affected as little as possible, whether that be targeting contractors with social value commitments during construction or wider community benefit initiatives.</p> <p data-bbox="1573 1669 2819 1837">Taking into account the range of determinants considered within Chapter 11: Human Health of the ES [APP-042] and supporting documents such as the Equality Impact Assessment (EqIA) [APP-227], the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment which considers a range of health determinants relevant to quality of life and amenity. No significant adverse effects are identified with regards to human health,</p>

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REP2-032	7000 Acres	Quantitative data	Comment that there is a lack of quantitative local data so failed to understand how the interrelationship of surrounding area and Gainsborough town are linked	<p>specifically including in respect of changes in landscape and visual amenity, noise, access to open space and employment, air pollution and access to healthcare facilities.</p> <p>The Applicant has undertaken a comprehensive and robust Environmental Impact Assessment, including an expansive baseline of quantitative local data. Drawing upon this data, Section 14.6 of Chapter 14: Socio-Economics and Land Use of the ES [APP-045] presents the findings of an assessment of the likely significant effects on socio-economics and land use as a result of the Scheme in accordance with paragraph 5.13.9 of NPS EN-1 (Ref 1-4. Chapter 14: Socio-Economics and Land Use of the ES [APP-045] follows best practice guidance (Error! Reference source not found.) and follows professional judgement and best practice methodology from other assessments undertaken on comparable energy infrastructure schemes to assess the impact of the Scheme on employment, agricultural land, PRoW, and tourism.</p> <p>Taking into account the impact of the Scheme on the surrounding area and the interrelationship between the local area and Gainsborough town, the Application sets out benefits in Chapter 14: Socio-Economics and Land Use of the ES [APP-045] of the Scheme on the local economy. Paragraph 14.8.23 (Table 14-19) confirms that during construction, £52.3m Gross Value Added per annum will be generated by the construction phase of the Scheme. Whilst the magnitude of the impact on West Lindsey is low, it is nonetheless a minor beneficial impact of the Scheme.</p> <p>It is also noted that the Greater Lincolnshire Local Enterprise Partnership recognises that the energy sector is a priority economic sector to contribute towards the growth of the local economy, an important piece of context for the wider local area.</p>
REP2-032	7000 Acres	Wider regional effects	Comment that the applicant has not factored in wider regional effects of health	<p>The approach to the assessment of effects on human health reported within Chapter 11: Human Health of the ES [APP-042] was agreed with the Planning Inspectorate via the EIA Scoping process (refer to Appendix 1-1: EIA Scoping Report of the ES [APP-051] and Appendix 1-2: EIA Scoping Opinion of the ES [APP-052]). The assessment follows the guidance set out within NHS England's Healthy Urban Development Unit's (HUDU) Rapid Health Impact Assessment (HIA) Toolkit 2019 (Ref 1-23) and the Institute of Environmental Management and Assessment (IEMA) guidance "<i>Determining Significance For Human Health In Environmental Impact Assessment</i> (Ref 1-24).</p> <p>As stated in Chapter 11: Human Health of the ES [APP-042], the Study Areas are based on the extent and characteristics of the Scheme and the communities/wards directly and indirectly affected by the Scheme. Impacts that occur beyond this are also addressed within the assessment itself, as the Human Health assessment draws upon the findings of supporting chapters to inform its conclusions. These chapters have their own Study Areas for their own individual assessments, which vary in their extent. Each chapter also sets out mitigation measures relevant to their individual disciplines, such as environmental management plans. Each of these chapters also includes a baseline analysis section, which includes a review of the existing surrounding area.</p> <p>The choice of Study Areas for the Human Health assessment is appropriate and in-line with the appropriate guidance referred to above. No assessment of impacts at a regional, East</p>

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				Midlands, level is required, nor is it evident how impacts would materialise at such a level such as to warrant an assessment.
REP2-032	7000 Acres	Cumulative effect	Comment that the cumulative effect on health needs further detail	<p>The cumulative human health impacts of the Scheme are considered in the cumulative effects analysis in Chapter 18: Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev02)].</p> <p><u>Cumulative Effects</u> The assessment of cumulative impacts of the Scheme with other developments in the locality is set out in Chapter 18: Cumulative Effects and Interactions of the Environmental Statement [EN010142/APP/6.1(Rev01)]. The Scheme and other solar DCOs have worked collaboratively during design development and environmental assessments, including identification of a shared Cable Route Corridor, sharing baseline environment information and identification of shared mitigation measures to minimise impacts on the wellbeing of the community. In terms of cumulative effects of the Scheme with other developments in the area, the only effects relating to human health are stated in Chapter 18: Cumulative Effects and Interactions of the Environmental Statement [EN010142/APP/6.1(Rev01)] to include air quality, noise and vibration effects, transport and access and socio-economic effects. Chapter 18: Cumulative Effects and Interactions of the Environmental Statement [EN010142/APP/6.2(Rev01)] concludes that there would be no significant cumulative effects in relation to all of the above factors.</p> <p><u>Lincolnshire Joint Strategic Needs Assessment (JSNA) (Ref 1-25) and the updated Joint Health and Wellbeing Strategy for Lincolnshire (2024) (Ref 1-26)</u></p> <p>The Applicant acknowledges the JSNA (Error! Reference source not found.) and updated Joint Health and Wellbeing Strategy for Lincolnshire (2024) (Error! Reference source not found.), and can demonstrate that the Scheme is consistent with them. The Lincolnshire JSNA and the Joint Health and Wellbeing Strategy share the same aims for the area of Lincolnshire, which include:</p> <ul style="list-style-type: none"> • <i>“Taking collective action on health and wellbeing across a range of organisations”</i> and • <i>“Tackling inequalities and equity of service provision to meet the population needs”</i> <p>The policies also share priority areas for health in Lincolnshire, including mental health and dementia, and physical activity.</p> <p>With reference to these aims and priorities, Chapter 11: Human Health of the ES [APP-042] aligns with this through the assessment of the Scheme on human health and wellbeing receptors. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. No significant adverse effects are identified with regards to human health, which aligns with the stated aims of the JSNA and the Joint Health and Wellbeing Strategy to improve health outcomes.</p> <p>In addition, and as noted above, Chapter 11 finds beneficial impacts on employment and income, prioritisation of walking and cycling routes (through new permissive paths) and</p>

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				climate change during operation, which will lead to positive effects on human health, including both physical and mental health. This positive effect provides alignment with the aims and priorities of the JSNA and the Joint Health and Wellbeing Strategy through improving the provision of service and providing beneficial impacts on the priority areas of mental health and physical activity. In summary, the assessment of human health and wellbeing effects set out in Chapter 11: Human Health of the ES [APP-042] would not be expected to change as a result of incorporating these policies.
REP2-032	7000 Acres	Engaging with sensitive groups	Comment requesting details of how the Applicant engaged with sensitive groups such as children, older people and disabled residents face to face (not through open meetings as stated in the EqIA held at various points).	Section 6.5 of the EqIA Report [APP-227] summarises the Applicant's approach to engagement with seldom heard and underrepresented groups. The Applicant used a range of free-to-use communications channels, including freephone number, and a combination of in-person and digital formats to share information and receive feedback. The Applicant shared information to identified seldom heard groups covering a variety of age groups, including but not limited to: schools and education facilities, youth and support groups, charitable organisations and religious groups, disability organisations, other local groups and near neighbours. A full list is provided in Consultation Report: Appendix C – Stat Con under Section 47 [APP-024] . Where concerns were raised by members of seldom heard and/or underrepresented groups related to protected characteristics, the Applicant engaged directly with the relevant individuals to understand their concerns and discuss potential resolutions.
REP2-032	7000 Acres	Consultation material	Query whether the applicant provides large print or easy read/ details in braille to those disabled to inform them about their scheme? Only dementia friendly materials are mentioned.	As stated in the Equality Impact Assessment (EqIA) [APP-227] section '7.2 Consultation' impacts, the Applicant offered materials in formats which meet the needs of the local population, including the provision of written, braille, and dementia friendly materials in an area where a high proportion of the population are older people.
REP2-032	7000 Acres	Enquiries	Query about how the Applicant enquired around people experiencing multiple needs such as homelessness, mental health problems, being involved in the criminal justice system or substance misuse. This should include our military veteran population within the targeted area.	The Applicant identified seldom heard and underrepresented groups through desk-based research and discussions with local authorities through regular monthly meetings and informal/formal consultation on the Statement of Community Consultation. This is detailed in section 6.3 of the Consultation Report [APP-021] . The Applicant also provided a direct mail of the consultation leaflet to approximately 5,000 properties/businesses within the Primary Consultation Zone, an area identified taking into consideration where the Scheme may have a direct or indirect impact, either permanently or temporarily, as a result of construction, operation and maintenance or decommissioning.
REP2-032	7000 Acres	Scheme impacts on people, farmers or agricultural workers	Query whether people, farmers or agricultural workers, experience any specific disadvantage as a result of this project	The Applicant has provided responses to concerns relating to impacts on agricultural employment and the local economy in Table 2-3, RR Ref No. RR-292 on page 136 to 139 of the Applicants Response to Relevant Representations [REP1-028] .
REP2-032	7000 Acres	Surveys	Query why no targeted surveys were carried out (qualitative data to inform this important document)?	Section 42 of the Planning Act 2008 (Ref 1-9) states who the Applicant must consult about a proposed application for a DCO. This includes Section 42(1)(a) 'prescribed consultees', which were identified by reference to Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (the APFP Regulations) (as amended) (Ref 1-27). This lists all Prescribed Consultees and the circumstances when they must be

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			<p>Comment querying why local public health and the NHS were not consulted to assess this document.</p> <p>Comment that up to date analytical data beyond a desk top review is required to inform this document.</p>	<p>consulted about a proposed application for a DCO. As such, the Applicant consulted with the following organisations in relation to public health: NHS England, NHS Nottinghamshire Integrated Care Board and NHS Lincolnshire Integrated Care Board.</p> <p>Section 2 of the Equality Impact Assessment (EqIA) [APP-227] outlines the approach adopted for conducting the assessment. Targeted surveys with specific groups were not utilised to inform the EqIA and it is noted that no request for its use was made prior to the submission of the DCO Application. It is also noted that there is limited, if any, precedent for undertaking equality specific face-to-face engagement on DCO applications for NSIPs unless a specific request is made prior to the Application being submitted.</p>
REP2-032	7000 Acres	Health and wellbeing	Comment requesting that the applicant advises as to who they have worked with in the local area to inform them of the issues around health and wellbeing for the targeted area	The Applicant developed a Statement of Community Consultation (SoCC) to outline how it would conduct its statutory consultation with the local community. The Applicant held discussions with local authorities through regular monthly meetings and informal/formal consultation on the SoCC to take advantage of their local knowledge. This process, and how the Applicant had regard to the comments received from local authorities on the SoCC, is detailed in section 6.2 of the Consultation Report [APP-021] .
REP2-032	7000 Acres	Protected characteristics	Comment requesting that the applicant expands on how they intend to employ people within the protected characteristic groups e.g. disabled or from our traveller community	<p>The Equality Impact Assessment (EqIA) [APP-227] outlines that the Framework Skills, Supply Chain and Employment Plan (Framework SSCEP) [APP-232] will be used to promote interaction with local partners and businesses to support local employment in the supply chain. Pages 32 and 33 of the Framework SSCEP [APP-232], outline commitments by the Applicant and opportunities the Applicant has identified could be employed to maximise the diversity of the workforce.</p> <p>The Applicant has committed to:</p> <ul style="list-style-type: none"> • Metrics on workforce diversity, gender split of workforce, skill level of workforce (skilled/unskilled) to be required by the Applicant for all contractors. • A Sustainable Sourcing Policy and Equality Policy will be followed by the Applicant when selecting contractors, including with reference to protected characteristics. • Regularly reporting on demographics of both applications and successful candidates. <p>The Applicant has also proposed to:</p> <ul style="list-style-type: none"> • Undertake consultation and/or research post consent with the local community to identify particular protected characteristic groups that could be targeted for particular measures by the Scheme. • Ensure target groups are directly engaged with via local community networks or job brokerage agencies for employment opportunities. • Working with job support and training providers who operate programmes aimed at getting people into work (for example, young people who are Not in Education, Employment or Training (NEET) may require pre-employment, basic skills training and work placements). <p>It is noted that the above are opportunities identified at this stage, and specific measures to target protected characteristic groups could be added to the final SSCEP based on community feedback and any input from the Examination process.</p>

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REP2-032	7000 Acres	Mitigation	Comment querying what the physical health needs of the elderly are and how will the Applicant mitigate these e.g loneliness, isolation, fragmented networks which all have the potential to worsen due to the altered landscape planned through this scheme (and the cumulative impact)	The Equality Impact Assessment (EqIA) [APP-227] considered the health needs of the elderly in relation to increased noise and vibration, air pollution, and traffic and transport during construction. For example, in relation to PRow changes, the Equality Impact Assessment (EqIA) [APP-227] outlined the potential for closures to impact elderly people who are unable to use alternative means of transport and who rely on PRow to access key facilities. In relation to noise and vibration caused by construction activities, older people may experience auditory and perception issues, psychological annoyance, or disorientation. Mitigation measures relating to impacts from the Scheme in isolation and cumulatively with other projects are set out in the Framework CEMP [EN010142/APP/7.8(Rev02)] , Framework OEMP [EN010142/APP/7.9(Rev02)] , Framework DEMP [EN010142/APP/7.10(Rev02)] , Framework LEMP [EN010142/APP/7.17(Rev03)] , Framework CTMP [EN010142/APP/7.11(Rev03)] and Framework Public Rights of Way Management Plan [EN010142/APP/7.16(Rev01)] . These include measures such as PRow diversions and management, making sure that disruption is as minimal as possible, the provision of two new permissive paths, and the provision of a community liaison group to facilitate liaison between representatives of people living in the vicinity of the Order limits in relation to the construction of the Scheme to further support communication and the implementation of mitigation measures.
REP2-032	7000 Acres	Noise impacts	Comment querying whether the EqIA has highlighted any other issues besides the person known to the applicant in relation to noise. Comment querying how many partially sighted, blind people live in the study area or surroundings, and what proportionate of military veterans with Post Traumatic Stress Disorder maybe affected by noise.	The Equality Impact Assessment (EqIA) [APP-227] does not assess impacts at an individual level to ensure that specific individuals cannot be identified. The Equality Impact Assessment (EqIA) [APP-227] collected data for local people from a defined 'Study Area', described in Section 5 of the assessment, in relation to the protected characteristic groups prescribed under the Equality Act 2010 (Ref 1-19). Data on partially sighted, blind, or military veterans with Post Traumatic Stress Disorder was not collected as these are not protected characteristic groups.
REP2-032	7000 Acres	Independent health expert	Comment requesting that the Applicant obtains an independent health experts' advice to recommend whether or not the noise produced will affect the quality of health of the people living next to the scheme (cumulative effect to be considered as well). Comment that documentary evidence of this would be useful.	The assessment set out in Chapter 13: Noise and Vibration of the ES [AS-006] provides an assessment of the impacts of the Scheme's noise and vibration, and how it affects human health and quality of life. As set out in Appendix 1-3: EIA Statement of Competence of the ES [APP-053] the noise and vibration assessment presented in Chapter 13: Noise and Vibration of the ES [AS-006] has been prepared by a noise expert with over 18 years' experience in noise and vibration assessments and has undertaken these for a number of DCO applications including those for solar projects. The assessment has also been undertaken following national legislation and policy, as well as local policy and guidance as presented in Appendix 13-1: Noise and Vibration Legislation, Policy and Guidance of the ES [APP-110] . The assessment brings together industry guidance and standards to assess the impact of noise on human health in line with national and local planning policy and guidance. The assessment aligns with the methodology applied for other consented solar DCO applications which have been consented, such as Gate Burton [EN010131] and Cottam [EN010133]. Impacts of noise on health are also set out in Chapter 11: Human Health of the ES [APP-042] which has been prepared by an expert with experience working on a number of DCO applications including those for solar projects.

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				As outlined in both Chapter 13: Noise and Vibration of the ES [AS-006] and Chapter 11: Human Health of the ES [APP-042] , while there would be some adverse effects on receptors in proximity to the Scheme (which includes effects on human health and quality of life), none of these would be significant from a noise or human health perspective, due to the mitigation embedded into the Scheme design. This mitigation would include the implementation of a Construction Environmental Management Plan which will ensure construction noise does not cause any significant effects, and buffers set out in the Outline Design Principles Statement [EN010142/APP/7.4(Rev02)] which commits to locate Solar and BESS Stations at least 250m from residential properties. Both of these documents will be secured by the DCO, and the Scheme must substantially accord with them.
Noise				
REP2-032	7000 Acres	Transformers	Comments querying the impacts of noise from transformers on sensitive people.	The Applicant has responded to concerns relating to the impact of transformer noise on sensitive people in Table 2-14 on page 282 of the Applicant's Response to Relevant Representations [REP1-028] .
REP2-032	7000 Acres	PRoW	Comment querying how noise will impact on users of PRoW.	Noise is not expected to significantly impact users of PRoW as set out on page 12, paragraph 13.4.11 of Chapter 13: Noise and Vibration of the ES [AS-006] . The proposed approach to manage the impact of users of PRoW is described in Table 3-9 on page 56 of the Framework CEMP [EN010142/APP/7.8(Rev02)] and section 3 on page 7 of the Framework PRoW Management Plan [EN010142/APP/7.16(Rev01)] as secured by Requirement 12 and 16 of the draft DCO [EN010142/APP/3.1(Rev04)] .
REP2-032	7000 Acres	Noise modelling	Concerns around noise modelling and digital noise assessment vs subjective hearing with cumulative issue of background noise creep.	The noise assessment reported in Chapter 13: Noise and Vibration of the ES [AS-006] is necessarily based upon modelled data due to the Scheme infrastructure not yet being operational, but the conditions that inform the potential impact of the Scheme are informed by measured levels of the existing environment.
REP2-032	7000 Acres	Noise	Concerns around the impact of noise from the Scheme.	The Applicant has responded to concerns relating to noise impacts arising from the Scheme in Table 2-13 on page 274 of the Applicant's Response to Relevant Representations [REP1-028] .
Landscape and Visual				
REP2-018	7000 Acres	Landscape character and visual amenity	Concerns about the impacts on the landscape character and visual amenity of the proposed site and surrounding landscape	The Applicant has responded to concerns relating to landscape character in Table 2-3 on page 20 of the Applicant's Response to Written Submissions at Deadline 1 [REP2-007] . The Applicant has also responded to concerns relating to visual impacts of the Scheme in Table 2-12 on page 271 of the Applicant's Response to Relevant Representations [REP1-028] and Table 2-3 on page 18 of the Applicant's Response to Written Submissions at Deadline 1 [REP2-007] .

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REP2-018	7000 Acres	Mitigation	Comment that the establishment of planting will impact on the local ecosystem, causing an imbalance, and causing planting to be destroyed.	As set out in the Outline Design Principles Statement [EN010142/APP/7.4(Rev02)] deer fencing is proposed around the outer boundaries of the Principal Site and biodiversity enhancement areas. This will prevent browsing of young trees, shrubs and hedgerow plants.
REP2-018	7000 Acres	Cumulative impact	Concern over cumulative impacts arising from solar schemes on the landscape	The Applicant has responded to issues regarding concerns over cumulative impacts on the landscape in Table 2-20 on page 292 of the Applicant's Response to Relevant Representations [REP1-028] .
REP2-018	7000 Acres	Draft DCO	<p>Comment that in terms of landscape and visual impacts, the draft DCO specifically cites the provision to remove any tree or shrub within the authorised development however the LVIA contradicts this and claims retention and enhancement of trees and hedgerow within the same order limits.</p> <p>No landscape plans show the potential of the Applicants statement in the draft DCO to remove any trees across the Scheme i.e the 'worst case scenario'.</p>	<p>Paragraph 12.8.9 in the Chapter 12: Landscape and Visual Amenity of the ES [EN010142/APP/6.1(Rev01)] states that construction will not result in the loss of valued landscape features such as veteran or ancient trees or areas of high biodiversity and that there will be only localised removal of short sections of hedgerow and a small number of low-value trees where this cannot be avoided for access.</p> <p>Vegetation to be removed is shown on the Hedgerow Removal Plan [AS-044] and within the Arboricultural Impact Assessment [APP-107], Tree Constraints Plan and Tree Protection Plans in Annex A and C [APP-107 to APP-109] which have been submitted with the Application and set out further details of the Scheme's impact on trees. Measures relating to vegetation removal are set out in the Framework LEMP [APP-EN010142/APP/7.17(Rev3)] which will inform a detailed LEMP which will be secured by requirement 7 in Schedule 2 of the draft DCO [EN010142/APP/3.1(Rev04)] relating to the preparation and approval of the detailed management plan. Should any additional tree works be required, these must be discussed with an arboriculturist and no works can be undertaken without the prior consent of the relevant local planning authority.</p>
REP2-018	7000 Acres	Study areas and zones and theoretical visibility	It is not clear if the Applicant has produced plans showing the collective study areas and multiple zones of theoretical visibility (ZTV) for all four NSIP solar projects in the West Lindsey District. If this has not been provided by the Tillbridge Solar Project, 7000 Acres requests that such a document is supplied for the Examination.	A cumulative ZTV showing the visibility of the Scheme with all four Solar DCO schemes combined and individually identified was not produced, as the Applicant did not consider that the graphic output, which will comprise multiple differentiating colours, would be sufficiently legible or offer material value to the assessment of cumulative visual effects.
Biodiversity Net Gain				
REP2-018, REP2-033	7000 Acres	Net gain	Concerns over the validity of biodiversity net gains and concerns over the harms associated with the process	As set out in the Biodiversity Net Gain Report [AS-062] , the BNG assessment for the Scheme has been undertaken to quantify the overall effect of the Scheme upon the Order limits biodiversity value by comparing the Order limits baseline habitat value with that following implementation of the Scheme. Calculations consider the level of proposed habitat loss, retention, enhancement and/or creation delivered by the Scheme and are measured using DEFRA's Statutory Biodiversity Metric in accordance with DEFRA's Statutory Biodiversity Metric User Guide (Ref 1-28) and the CIEEM, IEMA & ciria (2019). Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide (Ref 1-29).

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REP2-018	7000 Acres	Net gain	Comment that subsequent planting of new and immature vegetation does not equate in biodiversity terms to the removed existing and mature vegetation. There is an immediate and lasting impact on biodiversity as the new vegetation takes several years to establish. These interventions equate to a biodiversity loss.	<p>The calculation provided in the Biodiversity Net Gain Report [AS-062] specifically considers the time it takes for habitats to establish and weights the unit gains accordingly.</p> <p>This Report forms part of the Framework LEMP [EN010142/APP/7.17(Rev03)], which states at paragraph 4.6.2 that the Applicant is committed to achieving a minimum of 10% BNG, in accordance with the terms of the Biodiversity Net Gain Report [AS-062]. Requirement 8 of the draft DCO [EN010142/APP/3.1(Rev04)] provides that construction cannot commence until a BNG strategy (as captured in draft form by the LEMP and Report) has been submitted and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body (being Natural England).</p> <p>This ensures that the duration concern outlined has been, and will be, accounted for the biodiversity net gain measures provided for the Scheme.</p>
Risk Management				
REP2-020	7000 Acres	Risk management	Question as to whether the applicant has produced a Quantitative and Qualitative Risk Analysis for the project and if so can this and the procedure they have applied and the resultant risk register including proposed mitigations and expected results, be shared	<p>In accordance with legislation and guidance for DCO applications (Ref 1-9), the Applicant has undertaken an Environmental Impact Assessment (EIA) which identifies and assesses risks to the environment both quantitatively and qualitatively as appropriate as well as proposed mitigations. The Environmental Statement [APP-031 to APP-209] presents the EIA.</p> <p>The scope of the EIA has been developed through the EIA process (see Appendix 1-1: EIA Scoping Report [APP-051] and Appendix 1-2: EIA Scoping Opinion [APP-052] of the ES) and in consultation with statutory and non-statutory stakeholders, local planning authorities, interested parties and the public, as presented in the Consultation Report [APP-021].</p>
Water Environment				
REP2-031	7000 Acres	Contamination of watercourses	Concerns over contamination of controlled waters from suspended clay particles, which could be released as a result of the solar arrays mounted at the proposed angle.	An outline drainage strategy has been prepared, within Appendix 10-4: Outline Drainage Strategy of the ES [APP-098] . Within Section 3.5 of the Outline Drainage Strategy, water quality has been assessed using the CIRIA C753 SuDS Manual (Ref29)) Simple Index Approach, to assess runoff from, the solar PV arrays and impermeable areas. The proposed SuDS and surface water runoff mitigation measures ensure pollution of downstream receptors and controlled water is not increased.
REP2-031	7000 Acres	Water retention and runoff	Concerns over alteration of the balance of water retention and concerns over lack of consideration of surface water run-off	An Outline Drainage Strategy has been prepared, within Appendix 10-4: Outline Drainage Strategy of the ES [APP-098] . The drainage strategy will mimic the natural existing drainage regime within the Order limits and also restrict new impermeable areas to the greenfield runoff rate. SuDS features within the solar PV panel fields will incorporate edge swales which will intercept peak runoff and allow infiltration, reducing flood risk off site. New impermeable areas will attenuate runoff at source and discharge at greenfield rates. Gaps between solar arrays will be planted with native wildflower mix to prevent soil erosion and increases in concentrates runoff from the solar PV fields. Therefore, there will be no increase in flood risk to the Scheme or elsewhere.

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
REP2-031	7000 Acres	Raised swales	Comment that raised swales cannot be used to retain water due to impacts on wildlife and biodiversity	An Outline Drainage Strategy has been prepared for the Scheme, within Appendix 10-4: Outline Drainage Strategy of the ES [APP-098]. The strategy proposes at source swales for attenuation of runoff from new impermeable areas, and betterment swales at field boundaries to reduce existing surface water runoff to sensitive receptors where possible. Swales will not be raised above ground, they will be excavated into existing ground with no increase in ground levels; therefore ensuring existing runoff regimes are not impacted, with no adverse impact to biodiversity and wildlife.
REP2-031	7000 Acres	Concentrated flow	Failure to address concentrated flow under storm water conditions at the drop line of the panels and lack of infiltration into the soil in the rain shadow beneath the arrays	An Outline Drainage Strategy has been prepared, within Appendix 10-4: Outline Drainage Strategy of the ES [APP-098]. The Outline Drainage Strategy includes proposals to provide planting, in the form of native planting and wildflower mix in the gaps between the panels to prevent channelisation and prevent an increase in runoff. Rainfall falling off edge from the solar panel arrays will follow the ground profile and drain beneath the panels. A research paper by Cook and McCuen (2013) (Ref 1-31) states that solar panels themselves have non-significant impact on runoff volumes / peak / time to peak; therefore, there will be no adverse effect to surface water runoff from the solar panel arrays.
REP2-031	7000 Acres	Water quality	General concerns over the quantity of water used on the scheme and environmentally acceptable disposal of resultant effluent from cleaning	<p>Water supply and demand have been considered within Section 10.4 of Chapter 10: Water Environment of the ES [APP-041]. This includes estimates for water demand during construction and operation of the Scheme on the basis of current design. No connection to mains water supply is proposed during construction. During operation, it is proposed that the water supply for the Solar Farm Control Centre will come from the mains water supply. It has been assumed there would be up to 12 permanent staff during operation on site which would result in an estimated usage of 1,080 litres per day (or 1.08m³ /d) based on the industry standard of 90 litres per person.</p> <p>Paragraph 2.2.1 of the Framework OEMP [EN010142/APP/7.9(Rev02)] refers to the use of clean water with no added chemicals, sourced from local potable water suppliers (rather than the mains supply, so as not to apply additional stress on water supply), for the annual panel cleaning. Any matter washed off the panels is assumed to have already landed on the Principal Site in a baseline scenario (i.e. dirt, dust, animal droppings), and is therefore not considered to be additional pollution added by the Scheme, nor result in measurable pollution risk. As such, this will not lead to any significant pollution risk.</p> <p>As summarised within Chapter 10: Water Environment of the ES [EN010142/APP/6.1(Rev01)], impacts on water quality from drainage are also assessed within Section 3.5 of Appendix 10-4: Outline Drainage Strategy of the ES [APP-098]. The assessment demonstrates that pollution is effectively managed, using the CIRIA Simple Index Approach, with appropriate treatment provided, where required. Water quality of runoff from the Scheme will not adversely impact watercourses.</p> <p>Lincolnshire County Council as Lead Local Flood Authority (LLFA) covering the Principal Site, within their Local Impact Report [REP1A-001] paragraph 11.5, has determined the Appendix 10-4: Outline Drainage Strategy of the ES [APP-098] is acceptable.</p>

Land ownership

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
REP2-027	7000 Acres	Land ownership	Concerns over accuracy of land ownership for several plots of land with suggested negotiations to be carried out for plots of land where no options agreement is yet in place	<p>The Applicant is aware of the recent transfers between the C Nicholson No 1 Settlement and Tillside Limited and undertook a Land Registry review in October 2024.</p> <p>The Applicant has since reviewed all of the plots listed in the response and has identified that the C Nicholson No 1 Settlement should be removed from plots 1-07, 13-07 and 16-03 with Tillside Limited replacing the C Nicholson No 1 Settlement for plots 13-07 and 16-03. All other interests displayed within the Book of Reference [REP1-015] remain correct. The Applicant will ensure that the Book of Reference is updated at Deadline 4 to reflect the changes to plots 1-07, 13-07 and 16-03.</p> <p>The Applicant is also engaging with the representatives acting on behalf of the C Nicholson No 1 Settlement and Tillside Limited and negotiations are advancing. The latest position with regard to these negotiations can be found in the Schedule of Negotiations and Powers Sought [REP1-017].</p> <p>The Applicant is continuing its dialogue with both affected parties and will also continue to monitor the land interests across the Scheme for both parties.</p>
Glint and Glare				
REP2-030	7000 Acres	Glint and glare assessment	Comment that the applicant's assessment is too narrow and deficient, and that ground based receptors should be protected from green glare.	<p>As recognised in paragraph 3.1 of Appendix 17-2: Glint and Glare Assessment of the ES [APP-120], there is no legislation and limited guidance or policy available in the UK at present in relation to the assessment of glint and glare from developments. As such, the assessment has been undertaken in accordance guidance available in other policy documents, such as NPS EN-3 (Ref 1-5), in addition to references to international guidance where appropriate.</p> <p>As set out in Appendix 17-2: Glint and Glare Assessment of the ES [APP-120], a 1km Study Area around the Principal Site is considered adequate for the assessment of ground-based (residential, road, rail and PRoW) receptors, whilst a 30km Study Area is chosen for aviation receptors as a worst-case scenario to encompass the most representative receptors surrounding the Scheme. This approach is considered robust with regards to establishing the potential glint and glare effects as a result of the Scheme.</p> <p>The assessment concluded that no glint and glare impacts are likely at any receptors assessed within the 1km Study Area. As stated at paragraph 4.21 of Appendix 17-2: Glint and Glare Assessment of the ES [APP-120]: "<i>The further distance a receptor is from a solar farm, the less chance it has of being affected by glint and glare due to scattering of the reflected beam and atmospheric attenuation, in addition to obstructions from ground sources, such as any intervening vegetation or buildings. This is based on best practice and our experience of completing Glint and Glare Assessments across the UK and Ireland.</i>", This suggests that widening the Study Area would not identify further impacts to receptors not included within the assessment.</p> <p>With regards to the suggestion that ground-based receptors should be protected from green glare, it should be noted that green glare is not considered a typical concern for ground-based receptors. This is because the effects of green light are less intense compared to blue</p>

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
				or white light. It should also be noted that Appendix 17-2: Glint and Glare Assessment of the ES [APP-120] established that there would be no glare impact on residential receptors.
REP2-030	7000 Acres	Glint and glare assessment	Concerns over the method of assessment including the distance for the boundary of receptors, the actual observer heights, consideration of common eyesight conditions, and impacts to livestock and equestrian activities	<p>As noted above, the glint and glare assessment presented in Appendix 17-2: Glint and Glare Assessment of the Environmental Statement [APP-120] concluded that no glint and glare impacts are likely at any receptors assessed within the 1km Study Area, therefore demonstrating that widening the Study Area would be unlikely to identify further impacts to receptors not included within the assessment given that the further distance a receptor is from a solar farm, the less chance it has of being affected by glint and glare due to scattering of the reflected beam and atmospheric attenuation, in addition to obstructions from ground sources, such as any intervening vegetation or buildings.</p> <p>With regards to observation heights, consideration of potential impacts upon residential receptors at 2m height (i.e. the typical height of a ground floor window) is considered appropriate given that this is typically the main living space during the day and as such any potential impacts would have a greater significance with respect to residential amenity at this observation height. With regards to the observation height of road users, 1.5m is considered an appropriate representative height of the range of road users (i.e. as a typical eye level height of a road user) in establishing the potential for glint and glare effects.</p> <p>With regards to common eyesight conditions the Applicant is not aware of any evidence that observers with common eyesight conditions are susceptible to a higher level of impact for glint or glare. The Applicant is also not aware of any evidence that livestock and equestrian activities glint can be affected by glint and glare.</p>
REP2-030	7000 Acres	Cumulative impacts	Concerns over the cumulative impacts from existing schemes and lack of consideration for non-human receptors	<p>With regards to the potential for cumulative glint and glare effects, the assessment presented in Chapter 17: Other Environmental Topics of the ES [APP-048] identified that there will be no receptors which will experience significant effects as a result of the Scheme. Additionally, it is expected that the cumulative solar DCOs will be designed to ensure that there will be effective screening to prevent glint and glare effects from the individual proposed developments, as set out within their respective applications. Therefore, no cumulative effects are considered to arise for glint and glare.</p> <p>The Applicant is not aware of any evidence to suggest that local fauna can be significantly impacted by glint and glare. As noted in paragraph 3.9 of Appendix 17-2: Glint and Glare Assessment of the ES [APP-120], relevant studies generally agree that there is potential for glint and glare from photovoltaic panels to cause a hazard or nuisance for surrounding receptors, but that the intensity of such reflections is similar to that emanating from still water, which is considerably lower than for other manmade materials such as glass, steel or white concrete.</p>
Site Separation				
REP2-048	EDF Energy	Site separation agreement	A site separation agreement has been finalised with Uniper. Any infrastructure or operations associated with the Scheme must not negatively	The Applicant received a response from EDF on 28 November 2024 on their draft Heads of Terms for easements and further discussions will be required to resolve the remaining outstanding points. In any event, the Heads of Terms include reference to ensuring

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
			impact or hinder these site separation discussions.	reasonable endeavours are made to mitigate the impact of the Scheme on Uniper's assets and interests. The Applicant has reviewed and provided comment to EDF regarding their standard set of protective provisions for inclusion in the draft DCO [EN010142/APP/3.1(Rev04)] . These are substantively agreed from the Applicant's perspective, subject to the resolution of a few outstanding matters.
Draft DCO				
REP2-048	EDF Energy	Draft DCO	To ensure that the proposed cable route of the Proposed Development does not impact on future development at the Station, EDF considers that a requirement should be imposed within the draft Development Consent Order ("dDCO") requiring the subsequent approval of the final cable routing by Bassetlaw District Council with EDF as a named consultee in respect of such an approval.	The Applicant does not agree with this suggested approach, as the protective provisions being negotiated with EDF are intended to provide the appropriate protection for its operations and therefore additional controls are not necessary. The Applicant notes that no such requirements are included in the made Orders for the Cottam Solar Project or Gate Burton Energy Parks.
REP2-048	EDF Energy	Protective provisions	EDF considers it necessary for the protection and continued safe operation and future demolition of the Station that protective provisions be included within the dDCO. It is EDF's position that protective provisions are necessary and reasonable to avoid an adverse impact on and serious detriment to EDF's existing (and future) operations and to ensure that the Station can be safely demolished.	The Applicant acknowledges the requirements outlined by EDF for the safe demolition of the Cottam Power Station and any other existing and future operations of EDF at the site. The parties are currently subject to ongoing discussions in respect of protective provisions to manage any impacts on EDF's assets. The Applicant has reviewed and provided comment to EDF regarding their standard set of protective provisions for inclusion in the draft DCO [EN010142/APP/3.1(Rev04)] . These are substantively agreed from the Applicant's perspective, subject to the resolution of a few outstanding matters. The Applicant will provide a further update to the Examining Authority when agreement is reached.
REP2-011	Gate Burton Energy Park Limited	Protective provisions	Confirmation of agreement reached between Gate Burton Energy Park Limited and the applicant with regard to the protective provisions included at Part 6 of Schedule 15 of the Order, as set out in the version of the order submitted by the applicant at Deadline 1 and uploaded to the PINS website on 5/11/24	The Applicant acknowledges the agreement, and confirms the protective provisions as agreed have been included within the draft DCO [EN010142/APP/3.1(Rev04)] .
Other matters				
REP2-048	EDF Energy	Cottam priority regeneration area	EDF wish to ensure that the regeneration of the Station and the wider area is facilitated in line with the Council's requirements and ambitions. It is therefore imperative that the proposed cable route of the Proposed Development does not sterilise development land or detract from future development plans.	The Applicant acknowledges that the Cottam Power Station site is safeguarded land for future development as a Priority Regeneration Area within the emerging Bassetlaw Local Plan (Ref 1-32), as set out in the Planning Statement [EN010142/APP/7.2(Rev02)] . As set out in Chapter 4: Alternatives and Design Evolution of the ES [APP-035] the inclusion of the former Cottam Power Station site in the Scheme's Order limits was ruled out during the site selection process in order to avoid conflicting with this policy and to protect the site for future growth. The Scheme has avoided the former Cottam Power Station site in

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				its site selection process, and therefore it would not jeopardise the comprehensive remediation, reclamation and redevelopment of the whole site beyond the plan period, and would not preclude this area being developed in the future.
REP2-013	Ministry of Defence (MoD)	No objection	The proposed development falls outside of MOD safeguarded areas and does not affect other defence interests. The MOD, therefore, has no objection to the development proposed.	The Applicant notes this comment.
REP2-018	7000 Acres	Barriers to understanding	Comment that Interested Parties cannot fully engage in the examination process due to the detailed documents submitted by the Applicant requiring professional understanding	<p>The Applicant acknowledges that the number of documents and information required to be submitted as part of the application to comply with the Planning Act 2008 (Ref 1-9) and Government's advice pages, and the technical nature of the Environmental Statement can be difficult to navigate and understand. However, the Applicant has also prepared non-technical documents such as the Environmental Statement Non-Technical Summary [APP-208] and the Planning Statement [EN010142/APP/7.2(Rev02)] which set out the Applicant's environmental effects and mitigation in a less technical manner.</p> <p>In addition, in response to comments relating to the difficulty of navigating documents, and concerns raised during the Open Floor Hearing on 16 October 2024, the Applicant has subsequently ensured that responses to new comments provide full summaries of the issues raised, and where they do need to cross refer out to other documents, include the specific page and/or paragraph number for ease of navigation through those documents by Interested Parties.</p>
REP2-018	7000 Acres	Consultation	<p>Comment that the consultation process does not answer residents' questions and the Applicant must explain their findings in a fair, accessible, reasonable and informed manner to Interested Parties.</p> <p>Recommendation that the Applicant produces documentation tailored to Interested Parties which summarise the findings of the LVIA and other Application chapters and materials</p>	<p>The Applicant has responded to comments relating to the consultation process undertaken by the Applicant in Table 2-26 on page 309 of the Applicant's Response to Relevant Representations [REP1-028], which explains that the Planning Inspectorate has confirmed that the Applicant has consulted adequately, by accepting the Application for examination.</p> <p>The Applicant acknowledges that the number of documents and information required to be submitted as part of the application to comply with the Planning Act 2008 (Ref 1-9) and Government's advice pages, and the technical nature of the Environmental Statement can be difficult to navigate and understand.</p> <p>The Applicant submitted an Environmental Statement Non-Technical Summary [APP-208] and the Planning Statement [EN010142/APP/7.2(Rev02)] which set out a summary of the Applicants environmental effects and mitigation in a less technical manner tailored to Interested Parties.</p> <p>In addition, in response to comments relating to the difficulty of navigating documents, and concerns raised during the Open Floor Hearing on 16 October 2024, the Applicant has subsequently ensured that responses to new comments provide full summaries of the issues raised, and where they do need to cross refer out to other documents, include the specific page and/or paragraph number for ease of navigation through those documents by Interested Parties.</p>
REP2-018	7000 Acres	Planning applications	Comment that the Applicant states in Appendix 18-1 List of Cumulative Developments of the ES [APP-124 that the construction of the	Appendix 18-1: List of Cumulative Developments of the ES [APP-124] states that planning application submitted by IGas on land to the west of Northlands Road, Glentworth, to construct a hydrocarbon wellsite, with the drilling of one vertical appraisal well and up to

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
			<p>hydrocarbon wellsite, with the drilling of one vertical appraisal well and up to seven horizontal development wells and ancillary development has been completed. 7000 Acres state that to the best of their knowledge this is incorrect and the construction is not complete. They state that IGas Energy Plc was granted planning permission on 08/02/24 by Lincolnshire County Council at Land to the west of Northlands Road, Glentworth.</p>	<p>seven horizontal development wells and ancillary development, was granted on 8 February 2024. This is correct, with Lincolnshire County Council issuing their decision notice granting planning permission for the development, which is dated 8 February 2024. This can be found on Lincolnshire County Council's website under planning application reference PL/0135/22.</p> <p>Nowhere in the Application documents, including Appendix 18-1 List of Cumulative Developments of the ES [APP-124] or Chapter 18: Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev01)] does the Applicant state that construction of the development is 'complete'.</p> <p>To note, the Applicant has excluded the existing Glentworth K Oil Site, as well as the extension of the Oil Site subject to planning application reference PL/0135/22, which is located to the west of the existing site, ensuring no impact on the operation of these sites. Discussions took place between the Applicant and IGas (operator of the Glentworth K oil site) prior to planning permission being granted to ensure that there were no issues with the emerging Tillbridge Solar Project. Some adjustments were made to the Scheme design to ensure that access could be retained to the new oil site (PL/0135/22) and an agreement was reached to amend IGas' proposals to divert the new pipeline that would connect the existing wellhead to the proposed wellhead. The Application will therefore not prejudice the new oil site coming forward.</p> <p>The Applicant has also since incorporated a buffer of 30m from any BESS to the existing Glentworth K Oil Site as well as the area of land proposed for a further oil site under planning permission ref. PL/0135/22 which was approved on 8 February 2024. This is in order to avoid any safety concerns relating to the BESS and the Oil Site, and this commitment is set out in the Outline Design Principles Statement [EN010142/APP/7.1(Rev02)] submitted at Deadline 3.</p>

2.3 Local Authorities, Parish Councils, Persons with an Interest in the Land and Members of the Public

Table 2-3. Applicant's Responses to Local Authorities, Parish Councils', Persons with an Interest in the Land and Members of the Public

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
Climate and decarbonisation				
REP2-037	Members of the Public	Localised climate	Concerns that the solar PV will have an effect on the climate in the local area and increase the risk of flooding	An outline drainage strategy has been prepared, within Appendix 10-4: Outline Drainage Strategy of the ES [APP-098]. The drainage strategy will mimic the natural existing drainage regime within the Order limits and also restrict new impermeable areas to the greenfield runoff rate. SuDS features within the solar PV panel fields will incorporate edge swales which will intercept peak runoff and allow infiltration, reducing flood risk off site. New impermeable areas will attenuate runoff at source and discharge at greenfield rates. Gaps between solar arrays will be planted with native wildflower mix to prevent soil erosion and increases in concentrates runoff from the solar PV fields. Therefore, there will be no increase in flood risk to the Scheme or elsewhere.

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
				<p>The impact on local climate has been discussed in the Applicant's Response to Written Submissions at Deadline 1 [REP2-007]. The Scheme will not result in warming of the climate. Some studies have suggested a localised heating effect around solar installations (Ref 1-37), due to the panels being more absorbent of solar energy compared to the ground they are covering. However, this effect is slight, localised and not related to a large scale process contributing to climate change. Overall, construction of this Scheme will considerably assist the UK in achieving its net-zero commitments and significantly reduce the emissions produced by the electricity sector.</p>
REP2-012	Lincolnshire County Council	Climate Change contribution	Concerns over the efficacy of large solar farms in managing the impact of climate change both from the direct usage of renewable energy sources in just the UK, and from the carbon footprint produced in the making and transportation of solar panels	<p>The Applicant has provided a response to comments relating to efficiency of solar in Table 2-22 on page 298 of the Applicant's Response to Relevant Representations [REP1-028]. The Applicant has also produced a technical note on generating capacity and associated development at Appendix B of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-046] which explains the role of the BESS in ensuring that energy is captured and stored efficiently during periods of peak generation and can be made available for use throughout the year.</p> <p>The Applicant has provided responses to concerns relating to the carbon footprint of elements of the Scheme in Table 2-7 on page 265 of the Applicant's Response to Relevant Representations [REP1-028]. The GHG impact assessment in Section 7.3 of Chapter 7: Climate Change of the ES [APP-038] details the carbon footprint of the full lifecycle of the solar panels to be used within the Scheme. This assessment considers all potential emissions sources across the lifecycle of the Scheme, including but not limited to, material manufacture and transport during construction, replacement and maintenance of components during operation and any waste disposal resulting from decommissioned components. As set out in section 7.8 of Chapter 7: Climate Change of the ES [APP-038] GHG emissions savings are expected to be achieved throughout the lifetime of the Scheme compared to alternative fossil fuel energy generation types. Therefore, the GHG emissions during construction, operation and decommissioning of the Scheme are considered to be 'offset' by the net positive impact of the Scheme on GHG emissions.</p>
REP2-056	Members of the Public	Cost	Concerns that the push for decarbonisation is at a rate that will inevitably lead to increased costs for consumers	<p>As set out in the Written Summary of Applicant's Oral Submissions at the Open Floor Hearing 1 [REP1-047] as the electricity generated from the Scheme will be exported to the National Electricity Transmission System, and provided to consumers via third party electricity companies, the Applicant cannot commit to the provision of cheaper electricity prices for the specific community surrounding the Site. However, paragraphs 8.4.13 and 8.4.14 of the Statement of Need [APP-210] outline the impacts that insufficient renewable generation capacity would have on the UK, compared to building large quantities of renewable generation. The latter is anticipated to keep consumer costs down by capturing and storing energy when it is abundant (therefore cheap) and releasing it when it is needed. Solar remains one of the cheapest forms of electricity generation available with current technologies.</p> <p>The Scheme, through generating electricity will make a positive contribution to the UK's energy security. It is expected that the more power that is generated from renewable and low carbon sources (and the provision of this power at periods of high demand, through the use of technology like BESS), will lower the market price of electricity so that expensive and more carbon intensive forms of generation do not need to generate as much. The Statement of Need [APP-210] concludes at Section 9.5 that solar power delivers national decarbonisation benefits and supports consumer affordability aims, to the benefit of electricity consumers.</p>

Socio-economics, health and wellbeing

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
REP2-049, REP2-061, REP2-054, REP2-057, REP2-059, REP2-062, REP2-064, REP2-065, REP2-068, REP2-069, REP2-070, REP2-072, REP2-074, REP2-051, REP2-052, REP2-041	Glentworth Parish Council, Broxholme Parish Meeting, Members of the Public	Mental health and wellbeing	Concern over effects of the Scheme on mental health and wellbeing during each phase of the Scheme	<p>The Applicant recognises that the potential for future environmental changes associated with the Scheme during construction, operation and decommissioning may be a source of concern for local residents. The Applicant has undertaken a comprehensive and robust EIA so that any likely significant effects of the Scheme can be identified and mitigated as far as practicable. The Applicant has provided responses to concerns relating to health and wellbeing as part of the Applicant's Response to Relevant Representations [REP1-028] which can be found in the following locations:</p> <ul style="list-style-type: none"> • Table 2-11, page 269 to 271 • Table 2-4, RR Ref No. RR-001, page 199 to 200 • Table 2-3, RR Ref No. RR-095, page 160 to 161 <p>These sections explain that the assessment undertaken as part of Chapter 11: Human Health of the ES [APP-042] takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution). No significant adverse effects are identified with regards to human health, as a result of the extensive mitigation proposals included as part of the Scheme, which is also explained within these sections. The Applicant has also discussed health and wellbeing within paragraph 2.12 to 2.13 of the Written Summary of Applicant's Oral Submissions at Open Floor Hearing 1 [REP1-047].</p>
REP2-042, REP2-061, REP2-065	Members of the Public	Health assessment	<p>Concern that health has not been addressed by experts on behalf of the Applicant. Request for details of who wrote the health assessment in the Environmental Statement and what is their background and area of special interest.</p> <p>Request for an Issue Specific Hearing on health</p>	<p>The Applicant has responded to these comments in Table 2-2, REP1-063, page 12, and Table 2-3, page 27 of the Applicant's Response to Written Submissions at Deadline 1 [REP2-007].</p>
REP2-051, REP2-052	Glentworth Parish Council	PROW	Concerns over impacts to future reinstatement of Glentworth to Harpswell PROW which was removed from the definitive map	<p>The Applicant is aware of the claimed bridleway from Glentworth to Harpswell, which will provide a 'missing link' along a historical route between the spring-line villages at the base of Lincoln Cliff. The importance of this route has been highlighted through the consultation process. No panels are proposed along the route and the Scheme will not prejudice the proposal. The majority of the route will be screened by existing trees, with further vegetation along the eastern edge of the Principal Site limiting views of the Scheme once established. The Applicant notes the continued delay to the reinstatement of this route and that the Scheme will provide two north-south permissive paths further to the west.</p> <p>The Applicant has prepared and submitted a Framework Public Rights of Way Management (PRoW) Plan [EN010142/APP/7.16(Rev01)] to minimise the temporary impact of the Scheme on PRoWs. This sets out the management measures which would be put in place to achieve this. This will be secured by requirement 16 of Schedule 2 of the draft DCO EN010142/APP/3.1(Rev04). This requirement provides that the final PRoW Management Plan will need to be substantially in accordance with the Framework PRoW Management Plan [EN010142/APP/7.16(Rev01)]. The Framework PRoW Management Plan includes the claimed Glentworth and Harpswell Public Bridleway 1209 – this is a claimed bridleway which is assumed to become a definitive route in due course. Paragraph 3.1.3 of the Framework</p>

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
				PRoW Management Plan [EN010142/APP/7.16(Rev01)] identifies that physical separation and management measures will be implemented in this location to separate PRoW users from construction work. The PRoW will remain open and will not be closed or diverted.
REP2-046, REP2-055, REP2-074	Members of the Public	Security fencing	Comment that the security fencing will impact on public amenity and constrain movement through the Harpswell landscape, and the wider landscape	<p>The Scheme has sought to avoid proximity to villages and residential properties in line with the provisions of NPS EN-3 (Ref 1-5). Buffers from residential properties of at least 30 m have been incorporated into the Scheme. The fencing used for the Scheme will be of an agricultural nature, comprising timber posts and wire mesh up to 2.5m in height. Both the fencing and CCTV poles will be placed behind existing and proposed hedgerows to limit visual effects.</p> <p>As set out in Chapter 14: Socio-economics and Land Use of the ES [APP-045] during the operation of the Scheme, no permanent closures or diversions to PRoWs are proposed. Permissive paths to enhance the current PRoW network will also be provided as part of the Scheme, with one route connecting Common Lane to Kexby Road, and the second route connecting Common Lane to Northlands Road. This will offer recreational access in an area where PRoWs are limited and will also improve north-south off-road links. The Permissive paths will be located within 25 m wide corridors that will allow sufficient space for planting such as hedgerows to screen solar infrastructure and offer biodiversity and visual interest to users. A minor beneficial effect is expected due to the provision of additional permissive pathways. The Framework Public Rights of Way Management Plan [EN010142/APP/7.16(Rev01)] outlines how PRoW will be managed during the construction, operation and decommissioning of the Scheme. The measures contained within this document (Section 3) will help to ensure the ongoing operation of PRoW in the local area in terms of user safety and accessibility. A detailed PRoW Management Plan will be approved post consent prior to construction by the relevant local authorities, and this will be required to be substantially in accordance with the Framework PRoW Management Plan [EN010142/APP/7.16(Rev01)], as secured by Requirement 16 in Schedule 2 of the draft DCO [EN010142/APP/3.1(Rev04)].</p>
REP2-053, REP2-054, REP2-064, REP2-068, REP2-071	Members of the Public	House prices	Concern relating to impact on house prices and that the area will no longer be desirable to reside in	The Applicant has provided a response to comments relating to house prices in Table 2-15, page 284 of the Applicant's Response to Relevant Representations [REP1-028] .
REP2-054, REP2-016, REP2-017	West Lindsey District Council, Members of the Public	Tourism	Concerns over tourism including comment that tourists will not want to visit Lincolnshire if it is industrialised with solar panels	The Applicant has provided responses to concerns relating to impacts on local tourism in Table 2-3, RR-292, page 136 of the Applicant's Response to Relevant Representations [REP1-028] . Further clarification on the tourism assessment has also been provided within Appendix D of the Applicant's Response to Local Impact Reports [EN010142/APP/9.26] .
Noise and vibration				
REP2-037	Members of the Public	Noise risks	Comment querying what the risks of noise are during installation, and where the related assessments and mitigation plans are located	Chapter 13: Noise and Vibration of the ES [AS-006] assesses the noise during installation and mitigation measures are secured within Table 3-8 of the Framework CEMP [EN010142/APP/7.8(Rev02)] . With these mitigation measures in place, no significant adverse effects on local residents from construction activity are expected.
REP2-054, REP2-057, REP2-058,	Glentworth Parish Council,	Noise impacts	Concern regarding the noise impacts of the Scheme on local residents	The Applicant has provided responses in relation to noise and vibration impacts in Table 2-13, and Table 2-14 of the Applicant's Response to Relevant Representations [REP1-028] .

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
REP2-062, REP2-065, REP2-068, REP2-074, REP2-051, REP-052	Members of the Public			
BESS and Safety				
REP2-037, REP2-057	Members of the Public	Protecting the local population	Comment querying where the details on protecting the health and safety of the local population are located in the application documents.	Measures to manage and protect the health and safety of the local population during the construction, operation and decommissioning of the Scheme are of paramount importance to the Applicant. Measures relating to protecting the health and safety of the local population are ensured by both mitigation embedded within the Scheme design as set out within Chapter 3: Scheme Description of the ES [EN010142/APP/6.1(Rev02)] (for example, offsets/buffers of development from residential receptors), and via measures within a number of management plans which will be implemented as part of the Scheme. This includes (but is not limited to): a Design Principles Statement, a Construction Environmental Management Plan (CEMP), Construction Traffic Management Plan (CTMP), Operational Environmental Management Plan (OEMP) and Decommissioning Management Plan (DMP) and Battery Safety Management Plan. Framework versions of these plans have been submitted with the DCO which set out what the Applicant consider is broadly required at this stage (for example based upon technical assessments) in order to manage the impact of the Scheme, noting that certain details remain to be developed as the design of the Scheme progresses. The draft DCO [EN010142/APP/3.1(Rev04)] includes a requirement for the Outline Design Principles Statement [EN010142/APP/7.1(Rev01)] , Framework CEMP [EN010142/APP/7.8(Rev02)] , Framework CTMP [EN010142/APP/7.11(Rev03)] , Framework OEMP [EN010142/APP/7.9(Rev02)] , Framework DEMP [EN010142/APP/7.10(Rev02)] and Framework Battery Safety Management Plan [APP-225] to be developed into detailed plans that would be submitted for the approval of the relevant authorities at the relevant stage of the Scheme. Section 7 of the Framework Battery Safety Management Plan (BSMP) [APP-225] , outlines in detail the measures provided to manage safety matters including fires through the course of the Scheme's operation. Section 2.5 to 2.10 of the Framework CEMP [EN010142/APP/7.8(Rev02)] covers measures including the control of noise, light, traffic management, and responding to environmental incidents and emergencies during construction. An Emergency Response Plan (ERP) will be developed in consultation with the relevant local authority emergency planning officer, emergency services including the local fire service, as well as the Environment Agency in relation to responding to flood warnings and events. Measures to protect the health and safety of the local population during the operational phase (including the control of noise, light and response to emergencies) are covered in the Framework OEMP [EN010142/APP/7.9(Rev02)] , at sections 2.5 to 2.8, and section 2.9 of the Framework OEMP [EN010142/APP/7.9(Rev02)] covers security.
REP2-054	Members of the Public	Proximity to residents	Comment that proximity of panels and battery storage to primary schools and houses is unsafe	The proximity of the solar panels and Battery Energy Storage System (BESS) to local residents and other sensitive receptors has been robustly considered throughout the design and consultation process. The layout of the solar PV panels has been determined through consultation with landowners, statutory undertakers and the local community through an iterative design shared during statutory consultation. Also, as set out in Chapter 3: Scheme Description of the ES [EN010142/APP/6.1(Rev02)] , measures have been embedded into the Scheme design to minimise potential impacts to local sensitive receptors, such as the requirement that there will be no Solar Stations and Battery Energy Storage System Stations within 250m of a residential property. There are also no schools within 250m of any BESS.

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
				The Applicant has provided responses to concerns relating to battery safety in Table 2-25 on page 205 of the Applicant's Response to Relevant Representations [APP-028] .
REP2-037, REP2-070, REP2-038, REP2-054, REP2-056, REP2-057, REP2-062, REP2-063, REP2-068, REP2-072, REP2-016, REP2-017	West Lindsey District Council, Members of the Public	BESS	Concerns relating to the need and benefits for BESS against the risk including noise, fire and health, and the need for emergency access	<p>The Applicant has provided responses to concerns relating to BESS, including comments relating to the risk of fire and to health, in Table 2-25 on page 205 of the Applicant's Response to Relevant Representations [APP-028].</p> <p>Responses to comments relating to the noise impacts, including from BESS are included in Table 2-13, page 274 to 275 of the Applicant's Response to Relevant Representations [APP-028].</p> <p>The Applicant has also produced a technical note on generating capacity and associated development at Appendix B of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-046] which explains the role of the BESS in ensuring that energy is captured and stored efficiently during periods of peak generation and can be made available for use throughout the year.</p>
REP2-037, REP2-038, REP2-056, REP2-074	Members of the Public	Contamination from fire	Concerns of land and watercourses being contaminated through extinguishing fires	<p>The Applicant has responded to comments relating to the impacts of extinguishing fires in Table 2-25, page 305 to 308 of the Applicant's Response to Relevant Representations [APP-028]. The assessment in Appendix 17-5: Unplanned Atmospheric Emissions from BESS of the ES [APP-123] demonstrates that in the unlikely event of a fire, after 200m the atmospheric emissions of hydrogen fluoride from the BESS would be below acute exposure guideline levels and therefore, would not result in significant effects to human health, as no BESS will be located within 250m of residential receptors. Furthermore, as set out within Section 3.9 of Appendix 10-4: Outline Drainage Strategy of the ES [APP-098], the drainage design provides for fire water containment by providing a penstock arrangement on the lined swales surrounding each BESS. In the unlikely event of fire water being discharged, the runoff will be contained as per the Drainage Strategy and tested/treated before being allowed to discharge to the local watercourses. As such, no significant effects on watercourses are considered likely.</p> <p>At the time of installation, the Applicant will work closely with the Fire and Rescue Service to provide all relevant information on BESS and site design features to inform all necessary hazard and risk analysis studies and assist in the development of comprehensive Risk Management (RM) and Emergency Response Plans (ERP). This will include embedded design features to manage emergency scenarios such as fires should they arise, including dedicated fire water storage tanks and/ or hydrants. The design principles for the BESS set out within Table 1 of the Outline Design Principles Statement [EN010142/APP/7.4(Rev02)] state that there will be no BESS within 250m of residential properties.</p>
REP2-044	Members of the Public	BESS applications	Comment that BESS applications are now starting to be made to West Lindsey as they are outside national planning parameters	<p>A planning application for BESS 'WL/2024/00662', located on land at Willingham by Stow farm was submitted to West Lindsey District Council on the 19 July 2024. This application for BESS is not related to the Scheme and was submitted by a different developer.</p> <p>The BESS proposed as part of the Scheme is classed as associated development as described in paragraph 2.29 of the Planning Statement [EN010142/APP/7.2(Rev02)] and therefore forms part of the DCO application to which this examination relates.</p>
REP2-074	Members of the Public	Legislation	Comment that there is no present legislation covering the installation of BESS or ongoing management	As set out in Table 2-25, page 307 to 308 of the Applicant's Response to Relevant Representations [APP-028] the battery systems used in the Scheme are subject to stringent regulation and oversight to ensure safety and performance. These regulations cover design, installation, operation, and maintenance, and are enforced by manufacturers, constructors, operators, and both local and national

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
				authorities. The Framework Battery Safety Management Plan (BSMP) [APP-225] adheres to these regulations and incorporates best practices for monitoring and emergency response. This thorough approach guarantees that all battery systems operate safely and efficiently, in compliance with established regulatory requirements that are under constant revision and improvement. Further detail can be found in Table 2-25, page 307 to 308 of the Applicant's Response to Relevant Representations [APP-028] .
Materials				
REP2-049, REP2-037	Members of the Public	Forced labour	Request for the Applicant to state that no materials to and goods for this scheme are linked to forced labour	At this stage, the final choice of panels is not known, and a supplier has not been identified. However, the Applicant recognises that there are risks of modern slavery being connected to UK businesses and supply chains. The Applicant takes these risks seriously and will comply with all legal obligations regarding modern slavery in its procurement processes. Regarding this, the Framework Skills, Supply Chain and Employment Plan (SSCEP) [APP-232] sets out that the procurement strategy for the Scheme must be shaped to maximise opportunities to local businesses, with an ethical procurement policy, whilst seeking to minimise associated environmental impacts and safeguarding human rights in the supply chain. The final SSCEP must be substantially in accordance with the Framework SSCEP and is required to be submitted to and approved by the relevant planning authority (or authorities) before construction can commence on the Scheme. This is secured in Requirement 19 of the draft DCO [EN010142/APP/3.1(Rev04)] .
REP2-053, REP2-058, REP2-068, REP2-070	Members of the Public	Cost	Concerns over the cost of production, transportation and installation of materials associated with the Scheme and the CO ₂ this produces	The Applicant has provided responses to concerns relating to the carbon footprint and lifecycle emissions of the Scheme in Table 2-7 on page 265 of the Applicant's Response to Relevant Representations [REP1-028] and in Table 2-3 on page 24 of the Applicant's Response to Written Submissions at Deadline 1 [REP2-007] .
REP2-068	Members of the Public	Recycling	Comment that the Applicant has no intention of recycling panels	Recycling of solar panels was mentioned by LCC in their Relevant Representation [RR-165] . The Applicant provided detailed responses to the matters raised in the Applicant's Response to Relevant Representations [REP1-028] . This included preparation of a Waste Quantitative Cumulative Assessment, which assesses the cumulative waste impacts of the Scheme, which was provided as Appendix A to the Applicant's Response to Relevant Representations [REP1-028] . The Framework OEMP [EN010142/APP/7.9(Rev02)] and Framework DEMP [EN010142/APP/7.10(Rev02)] were updated at Deadline 1 to commit to a 70% waste recovery (diversion from landfill).
REP2-012	Lincolnshire County Council	Waste Facilities	Comment on lack of waste facilities for recycling	These concerns were also raised by LCC in their Relevant Representation [RR-165] . The Applicant provided detailed responses to the matters raised in the Applicant's Response to Relevant Representations [REP1-028] . This included preparation of a Waste Quantitative Cumulative Assessment, which assesses the cumulative waste impacts of the Scheme, which was provided as Appendix A to the Applicant's Response to Relevant Representations [REP1-028] .
Cumulative impacts				
REP2-038, REP2-044, REP2-047, REP2-049, REP2-053, REP2-054,	Lincolnshire County Council, West Lindsey District Council, Glentworth Parish Council,	Cumulative effects	Concerns of cumulative impacts of the Scheme and other solar projects.	The Applicant has provided responses relating to the cumulative impacts of the Scheme and other solar projects in Table 2-20 on page 292 of the Applicant's Response to Relevant Representations [REP1-028] .

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
REP2-056, REP2-057, REP2-063, REP2-067, REP2-069, REP2-070, REP2-074, REP2-016, REP2-017,REP2-012,REP2-051, REP-052	Members of the Public			
REP2-051, REP2-052	Glentworth Parish Council	Conflict with development	Comment that the Applicant appears to be unaware of the existence of granted consent for new oil drilling within the Scheme boundary.	<p>Chapter 18: Cumulative Effects and Interactions of the ES [EN010142/APP/6.1(Rev02)], Appendix 18-1: List of Cumulative Developments of the ES [APP-124], and the Planning Statement [EN010142/APP/7.1(Rev02)] acknowledge the existence of development at the Glentworth K Oil Site, and state that a planning application submitted by IGas on land to the west of Northlands Road, Glentworth, to construct a hydrocarbon wellsite, with the drilling of one vertical appraisal well and up to seven horizontal development wells and ancillary development, was granted on 8 February 2024 under planning application reference PL/0135/22.</p> <p>The Order limits exclude the existing Glentworth K Oil Site, as well as the area consented for further drilling under planning application ref. PL/0135/22, located to the west of the existing site, ensuring no impact on the operation of these sites. Discussions took place between the Applicant and IGas (operator of the Glentworth K oil site) prior to planning permission being granted to ensure that there were no issues with the emerging Tillbridge Solar Project. Some adjustments were made to the Scheme design to ensure that access could be retained to the new oil site and an agreement was reached to amend IGas' proposals to divert the new pipeline that would connect the existing wellhead to the proposed wellhead. The Application will therefore not prejudice the new oil site coming forward.</p> <p>The Applicant also wrote to IGas in September 2023 enclosing the standard protective provisions applicable to their assets/apparatus that would potentially be impacted by the Scheme, offering to commence discussions regarding the inclusion of protective provisions in the draft DCO to ensure their apparatus and operations were appropriately protected. No response was received to that initial correspondence. The Applicant followed up with IGas via email in May 2024 following acceptance of the DCO Application. No response has been received from IGas to date. The Applicant has therefore assumed that the previous discussions and agreed design changes referred to above were sufficient to address IGas' concerns.</p> <p>The Applicant has also since incorporated a buffer of 30m from any BESS to the existing Glentworth K Oil Site as well as the area of land proposed for a further oil site under planning permission ref. PL/0135/22 which was approved on 8 February 2024. This is in order to avoid any safety concerns relating to the BESS and the Oil Site, and this commitment is set out in the Outline Design Principles Statement [EN010142/APP/7.1(Rev02)] submitted at Deadline 3.</p>

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REP2-016, REP2-017	West Lindsey District Council	Shared cable corridor and Grid connection	Concerns over coordination of works and development for shared cable corridor and determination of responsible party for mitigation and restoration and points of connection for multiple projects	<p>The Applicant notes concerns raised regarding the need to deliver a joint co-ordinated approach to the construction of all four solar projects if each is consented. Each project will need to comply with the statutory provisions of its Order. This includes controls and management during all phases of the project through details to be approved by the relevant authority through the discharge of requirements. The requirements are set out in Schedule 2 of the draft DCO [EN010142/APP/3.1(Rev04)].</p> <p>In terms of the co-ordination of construction with the other projects, Appendix C of the Joint Report on Interrelationships between Nationally Significant Projects [APP-216] includes a copy of a Co-operation Agreement signed by each solar developer. This Co-operation agreement requires the developers to cooperate with each other during examination and until the determination of each DCO application and to then agree and enter into a Further Cooperation Agreement. The Further Cooperation Agreement will be an agreement between the Parties in order to manage the interaction of the projects during the discharge of requirements, and the respective construction and operational phases of each project. A draft Further Cooperation Agreement is currently being discussed between the parties.</p> <p>Whilst it is appreciated that this is a side agreement and does not form part of the DCO it demonstrates the willingness of the Applicant and the other developers to implement the projects should they all be consented in a co-ordinated manner to minimise impacts on the local communities.</p>

Alternatives

REP2-039, REP2-043, REP2-044, REP2-047, REP2-054, REP2-056, REP2-058, REP2-059, REP2-062, REP2-068, REP2-070, REP2-071	Members of the Public	Brownfield land and rooftop solar	Comments that solar should be located on brownfield sites or rooftops	<p>The Applicant has provided a response to comments relating to rooftop solar in Table 2-2, page 7 of the Applicant's Response to Written Submissions at Deadline 1 [REP2-007]. The Applicant has also provided a response to comments relating to the consideration of alternative sites for the Scheme in the following sections of the Applicants Response to Relevant Representations [REP1-028]:</p> <ul style="list-style-type: none"> • Table 2-22, page 300. • Table 2-4, RR Ref No. RR-001, page 220, 225 and 226.
Carole Dorne Johnson, REP2-070	Members of the Public	Alternative energy	Comments that nuclear and wind should be prioritised over solar energy	<p>The Applicant has responded to comments relating to alternative electricity generating methods in the following sections of the Applicants Response to Relevant Representations [REP1-028]:</p> <ul style="list-style-type: none"> • Table 2-4, RR Ref No. RR-303, page 192. • Table 2-4, RR Ref No. RR-094, page 194. <p>and Paragraphs 3.2 to 3.13 on pages 7 and 8 of the Written Summary of the Applicant's Oral Submission at the Open Floor Hearing 1 [REP1-047].</p>

Community benefits and liaison

REP2-040, REP2-055	Members of the Public	Community benefit	Comments relating to lack of community benefits	As set out within Table 2-3, RR Ref No. RR-292, page 143, Table 2-4, RR Ref No. RR-001, page 224 and Table 2-24, RR Ref No. RR-116, page 304 to 305 of the Applicant's Responses to Relevant Representations [REP1-028] , the Applicant has engaged with both the Lincolnshire and
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Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
				Nottinghamshire community foundations and should the Scheme receive development consent, the Applicant would provide a community benefit package secured by a fund. The Scheme will also include ecological enhancements, improvements to soil quality, improvements to the existing PRow network through the provision of permissive paths, and employment generation during construction.
REP2-016, REP2-017	West Lindsey District Council	Community wellbeing	Concerns over impacts of construction to the local community	In terms of disruption during the construction, operational and decommissioning phases and in recognition of the potential for impacts on mental health that could arise from activities on site, and surroundings, there are measures set out in the Framework CEMP [EN010142/APP/7.8(Rev02)] , Framework OEMP [EN010142/APP/7.9(Rev02)] and Framework DEMP [EN010142/APP/7.10(Rev02)] to reduce or avoid human health and wellbeing related impacts. These will inform separate detailed CEMP, OEMP and DEMP that will need to be approved by the Local Planning Authority (/Authorities) prior to construction, and this is secured by requirements 12, 13 and 20 respectively in Schedule 2 of the draft DCO [EN010142/APP/3.1(Rev04)] , each of which require the relevant detailed management plan(s) to be substantially in accordance with the framework plans submitted as part of the DCO Application.
REP2-038	Members of the Public	Community liaison	Query's relating to community liaison during construction, and what it will entail	The Applicant has provided a response on community liaison within Table 2-20 on page 297 of the Applicant's Responses to Relevant Representations [REP1-028] and in Table 2-3 on page 9 of the Applicant's Response to Written Submissions at Deadline 1 [REP2-007] .
Biodiversity				
REP2-058, REP2-060, REP2-063, REP2-064, REP2-068, REP2-074, REP2-016, REP2-017 REP2-051, REP-052	West Lindsey District Council, Glentworth Parish Council, Members of the Public	Impacts on wildlife	Comments relating to the impact of the Scheme on biodiversity	<p>The Applicant has provided responses to concerns relating to impacts on biodiversity and wildlife in the following sections in the Applicant's Response to Relevant Representations [REP1-028]:</p> <ul style="list-style-type: none"> • Table 2-5, RR Ref No. RR-139 and RR-276, page 242 to 243; • Table 2-4, RR Ref No. RR-001, page 212 to 213; • Table 2-3, RR Ref No. RR-095, page 166 to 167; and • Table 2-3, RR Ref No. RR-292, page 141 to 142 and 149 to 150. <p>These sections set out details of the assessments carried out in Chapter 9: Ecology and Nature Conservation of the ES [APP-040] and the conclusion that there will be no significant adverse effects on biodiversity, with significant beneficial effects to a variety of habitats, including broad-leaved woodland, running water, hedgerows and species, including breeding birds, particularly farmland birds associated with hedgerows and field margins. They also explain that the Scheme will deliver a minimum 10% gain for biodiversity as secured by both requirements 7 (landscape and ecological management plan) and 8 (biodiversity net gain) of Schedule 2 of the draft DCO [EN010142/APP/3.1(Rev04)].</p>
REP2-016, REP2-017	West Lindsey District Council	Habitat loss	Concerns over habitat loss including Marshland	The Applicant has undertaken extensive surveys to determine the habitats present within the Order limits. These are described in detail in Chapter 9: Ecology and Nature Conservation of the ES [APP-040] and Appendix 9-2: Baseline Report for Flora of the ES [APP-082]. The Order limits are characterised predominantly by arable farmland (accounting for 85.7% of the total area). An area of Coastal and Floodplain Grazing Marsh is present within the Cable Route Corridor, either side of the River Trent. As set out within the Framework CEMP [EN010142/APP/7.8(Rev02)] , the crossing of the River Trent will be undertaken using trenchless methods to lay cabling, therefore avoiding impacts the Coastal and Floodplain Grazing Marsh either side of the River Trent, with launch and exit pits located outside of this habitat. As such, there will be no loss of marshland associated with the Scheme.

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REP2-040, REP2-054	Members of the Public	Hedgerows	Comments that efforts should be made to preserve, create or thicken hedgerows	<p>The Scheme design has sought to avoid hedgerow loss as far as practicable, including the use of existing field entrances where possible. The Applicant has also taken opportunities to improve the quality, quantity and management of the hedgerows as part of the wider green infrastructure network within the Order limits, through the provision of new hedgerows, particularly within areas where these have been removed through agricultural intensification; and the enhancement of existing hedgerows, through more diverse native planting and management that is beneficial to wildlife. This is outlined in Section 5 of the Planning Statement [EN010142/APP/7.2(Rev02)], the Framework LEMP [EN010142/APP/7.17(Rev03)] and the Design and Access Statement [AS-031] and illustrated on the Indicative Landscape Masterplan [AS-028].</p> <p>Existing and proposed hedges will be managed at between 2.5 and 3 metres height, as described in the Framework LEMP [EN010142/APP/7.17(Rev03)]. Taller heights will be prescribed alongside routes such as roads through the Principal Site; details such as this will be confirmed through the final LEMP (which must be substantially in accordance with the Framework LEMP, as provided under Requirement 7 in Schedule 2 of the draft DCO [EN010142/APP/3.1(Rev04)]). Overall, the Applicant considers that there will be significant beneficial effects to a variety of habitats as a result of the landscape proposals introduced by the Scheme, including broad-leaved woodland and hedgerows, alongside breeding birds, particularly farmland birds associated with hedgerows.</p>
REP2-054	Members of the Public	Planting beneath solar PV	Comment that grass and other plants will not be able to grow under panels	The Applicant does not consider that shading provided by the panels will impede the growth of grasses or native flowering plants. Grass beneath solar panels is an established treatment for solar energy sites. Proprietary seed mixes intended for solar farms are available and include shade-tolerant species.
REP2-057, REP2-074	Members of the Public	Biodiversity Net Gain	Comment that the Scheme fails to deliver any net gain in biodiversity	<p>As set out in the Biodiversity Net Gain (BNG) Report [AS-062], the Scheme is predicted to deliver a net gain of 64.44% for area-based habitat units, 17.28% for hedgerow units, and 22.94% for watercourse units. The Applicant has committed to achieving a minimum level of BNG through the Scheme, as secured by both requirements 7 (landscape and ecological management plan) and 8 (biodiversity net gain) of Schedule 2 of the draft DCO [EN010142/APP/3.1(Rev04)]. Requirement 8 provides that construction cannot commence until a BNG strategy has been submitted and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body (being Natural England). The BNG strategy must be substantially in accordance with the Framework LEMP [EN010142/APP/7.17(Rev03)], which states at paragraph 4.6.2 that the Applicant is committed to achieving a minimum of 10% BNG, in accordance with the terms of the Biodiversity Net Gain Report [AS-062].</p> <p>This approach is consistent with that adopted in the Gate Burton Energy Park Order 2024 [EN010131], which the Secretary of State (agreeing with the Examining Authority) confirmed is an appropriate mechanism for securing BNG (refer to paragraphs 4.13 and 7.4 of the Secretary of State's Decision Letter and paragraph 5.2.14 of the Examining Authority's Recommendation Report).</p>
REP2-051, REP2-052	Glentworth Parish Council	Pests	Concern over increase of pests such as rats	As set out in paragraph 6.3.10 of the Framework LEMP [EN010142/APP/7.17(Rev03)] , a Biosecurity Management Plan is to be developed which would set out procedures to ensure any imported building/landscaping materials are free from invasive non-native species, such as rats. In the event that any future infestations of invasive non-native species are identified during the development process, exclusion zones will be established around them and the ecology team contacted for advice as required.

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
				<p>The Framework CEMP [EN010142/APP/7.8(Rev02)] also includes measures to prevent the introduction of invasive species into the Principal Site and to carry out pre-construction surveys to ensure that impacts are minimised on habitats and protected and notable species. The pre-construction surveys will be undertaken to provide an update on the presence and location of any invasive species and pests, the findings of which will inform the production of the Biosecurity Management Plan. Requirements 12 and 7 of Schedule 2 of the draft DCO [EN010142/APP/3.1(Rev04)] prevent the commencement of development until a detailed CEMP and detailed LEMP are approved by the relevant planning authority. The detailed CEMP and LEMP must be substantially in accordance with the Framework CEMP [EN010142/APP/7.8(Rev02)] and Framework LEMP [EN010142/APP/7.17(Rev03)], respectively, thereby ensuring compliance with the measures to protect the Principal Site from invasive species.</p>
Agricultural land and food security				
REP2-043, REP2-044, REP2-053, REP2-054, REP2-055, REP2-056, REP2-057, REP2-058, REP2-059, REP2-060, REP2-063, REP2-067, REP2-070, REP2-072, REP2-074, REP2-016, REP2-017, REP2-012, REP2-051, REP2-052	Members of the Public, Glentworth Parish Council Lincolnshire County Council, West Lindsey District Council	Agricultural land and food security	Comments that best and most versatile food producing land will be lost and should not be used for the Scheme	The Applicant has responded to comments relating to the impacts of using agricultural land, and why it is justified for the Scheme, as well as BMV land and food production, in Table 2-16, pages 285 to 287 of the Applicant's Response to Relevant Representations [REP1-028] , and Table 2-3, pages 21 to 23 of the Applicant's Response to Written Submissions at Deadline 1 [REP2-007] .
REP2-074	Members of the Public	Tenant farmers	Comment that tenant farmers that have tended to the land for generations will be thrown aside whilst landlords reap the rewards being offered by developers	The Applicant has responded to concerns relating to impacts to tenant farmers in Table 2-3 on page 23 of Applicant's Response to Written Submissions at Deadline 1 [REP2-007] .
Transport				
REP2-043, REP2-054, REP2-056, REP2-057,	West Lindsey District Council, Members of the Public	Traffic impacts	Comments relating to impacts to local roads	The Applicant has provided a response to comments relating to impacts of traffic on local roads in Table 2-17 on page 288 of the Applicant's Response to Relevant Representations [REP1-028] .

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
REP2-058, REP2-059, REP2-062, REP2-068, REP2-074, REP2-016, REP2-017,REP2-016, REP2-017				
Decommissioning				
REP2-043, REP2-053, REP2-054	Members of the Public	Disposal	Comments relating to funding of decommissioning	As set out in section 4.4 (page 11 and 12) of the Written Summary of Applicant's Oral Submissions at Issues Specific Hearing 1 [REP1-046] the Framework DEMP [EN010142/APP/7.10(Rev02)] provides for how the decommissioning will take place. The Applicant has submitted a Framework DEMP [EN010142/APP/7.10(Rev02)] as part of the DCO application. A detailed DEMP, which must be in substantial accordance with the Framework DEMP, will need to be agreed with the Local Planning Authority prior to decommissioning, and this is secured by Requirement 20 within the draft DCO [EN010142/APP/3.1(Rev04)] . It is noted that the Applicant is aware of its obligations in the draft DCO [EN010142/APP/3.1(Rev04)] with respect to decommissioning as set out in Requirement 20, meaning it would be setting aside funds during the operation of the Scheme to meet the cost of decommissioning. The requirements of the DCO are enforceable and it is a criminal offence to fail to comply with a DCO. The Proceeds of Crime Act 2002 (Ref 1-34) also acts as a further deterrent, and elements of the installed solar PV represent a valuable asset meaning it would be in Applicant's interest financially to decommission the site in order to sell or recycle the panels and other components. If the undertaker went into liquidation or receivership, its assets would be sold off to fund the decommissioning of the Scheme that is required pursuant to the legal requirement of the DCO (in this context, it is relevant that the DCO is a piece of legislation, and therefore different to a planning permission). The Applicant would also be under an obligation, pursuant to agreements with landowners, to return the land to landowners following decommissioning. This should give confidence that the Scheme will be decommissioned appropriately once it reaches the end of its operating life.
Maintenance and Waste				
			Concerns relating to the disposal of panels	The Applicant has provided responses to concerns relating to end of life processes for elements of the Scheme including solar panels in the Waste Topic Paper in Appendix A and at Table 2-18 page 290, and of the Applicant's Response to Relevant Representations [REP1-028] . This confirms that the Applicant is committed to maximising the recycling and reuse of the Scheme components at the end of life and applied the waste hierarchy with respect to the management of waste. This will be secured through the approval of an OEMP and DEMP, secured by requirements 13 and 20 of the draft DCO [EN010142/APP/3.1(Rev04)] . These will need to be substantially in accordance with the Framework OEMP [EN010142/APP/7.9(Rev02)] and Framework DEMP [EN010142/APP/7.10(Rev02)] , which were updated at Deadline 1 to commit to a 70% waste recovery (diversion from landfill).
REP2-016, REP2-017	West Lindsey District Council	Waste	Concerns around maintenance and waste management	These concerns were also raised by WLDC in their Relevant Representation [REP1-059] and Local Impact Report [REP1A-005] . The Applicant provided detailed responses to the matters raised in the Applicant's Response to Relevant Representations [REP1-028] on page 290. This included

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				preparation of a Waste Quantitative Cumulative Assessment, which assesses the cumulative waste impacts of the Scheme, which was provided as Appendix A to the Applicant's Response to Relevant Representations [REP1-028] . The Applicant has also provided a response within Table 2-2 of the Applicants Response to Local Impact Reports [EN010142/APP/9.26] .
REP2-016, REP2-017	West Lindsey District Council	Additional Development	Concerns over additional development occurring during the lifetime of the project as a result of maintenance and replacement work	As noted in paragraph 3.6.1 of Chapter 3: Scheme Description of the ES [EN010142/APP/6.1(Rev02)] , during the operational phase, activity within the Scheme will be minimal and will be restricted principally to vegetation management, equipment maintenance and servicing, replacement of any components that fail, solar PV panel cleaning and monitoring. Additional development to facilitate this maintenance and replacement work is not anticipated. During the operational phase, as components approach their design life, there will be an evaluation to determine if the components require maintenance and/or replacing. It is not anticipated that wholesale maintenance or replacement would be required but rather it would be programmed in stages to maintain the electrical export to the National Grid. The maintenance and replacement of Scheme components is considered within the assessment scenarios considered within the ES, and as such have been assessed as appropriate. A requirement for an annual schedule of proposed maintenance and replacement to be presented to the Local Planning Authorities (LPAs) is included within the Framework Operational Environmental Management Plan (OEMP) [EN010142/APP/7.9(Rev02)] . The panel and BESS replacement would only generate approximately 10% of the peak construction activity. However, mitigation measures, if necessary, would be agreed with the LPAs based on the schedule of proposed maintenance and replacement.
Scale, landscape and visual impacts				
REP2-043, REP2-045r, REP2-049, REP2-053, REP2-054, REP2-055, REP2-057, REP2-062, REP2-068, REP2-070, REP2-072, REP2- 074,REP2- 016, REP2- 017,REP2- 041	West Lindsey District Council, Broxholme Parish Meeting, Members of the Public	Visual impacts	Comments relating to the visual impacts of the Scheme, specifically: <ul style="list-style-type: none"> - Views to and from Lincoln Cliff Area of Great Landscape Value (AGLV). - Aerial views of the landscape from aircraft - Views from B1398 Middle Street - A631 and from Common Lane - Views from St Chad's Church - Views from Harpswell Hall - Views across the Till Vale - Views in and around Springthorpe Village 	With reference to visual impacts on views to and from the Lincoln Cliff and AGLV, the Scheme design evolution paid particular attention to the presence of the Lincoln Edge AGLV at an early stage to inform the Order limits associated with the Principal Site. This is shown on Figure 12-1: Initial Site Appraisal Plan of the ES [APP-043] . This set out land within and adjoining the Lincoln Cliff that would have greater landscape and visual impacts than other areas. Through this and continued design evolution, the Scheme sought to minimise landscape and visual effects as far as practicable. The Applicant accepts that significant residual (year 15) visual effects will arise for two representative viewpoints on the Cliff (Viewpoint 7 on Middle Street near Glentworth Cliff Farm and Viewpoint 13 at public footpath (Hems/787/2) near Hemswell. The Applicant also acknowledges that it is sometimes challenging to balance intentional screening of the Scheme against loss of locally important views. However, it has sought to limit visibility of the Scheme from more sensitive areas along the AGLV, including around Harpswell and Glentworth, through this early iterative design process. The methodology and scope of Chapter 12: Landscape and Visual Impact of the ES [EN010142/APP/6.1(Rev01)] , which was agreed with the LCC Landscape Officer, did not include reference to receptors in aircraft. The Applicant assumes that WLDC is referring to receptors using Sturgate Airfield, which is noted in Chapter 12: Landscape and Visual Impact of the ES [EN010142/APP/6.1(Rev01)] as being home to flying clubs and a café. Whilst the Applicant acknowledges that visibility of the Scheme will be available to those travelling in light aircraft to and from Sturgate Airfield, it is reasonable to assume that the focus at point of landing or take-off will not primarily be on the character of the landscape, and any visual effects would not be significant. The Applicant considers that the exclusion of receptors in aircraft reflects a proportionate approach to the assessment.

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
				<p>With reference to views from the B1398 Middle Street, the Applicant acknowledges that residual significant effects will occur during construction and operation year 1 for representative viewpoint 4 (Figure 12-14 of the ES [APP-187]) above Harpswell; and for the same stages and also Year 15 for representative viewpoint 7 near Glentworth Hall Farm (Figure 12-14 of the ES [APP-187]). The Applicant accepts the local value of views from the Cliff, and that screening by hedgerows will result in the loss of this open aspect nearest to the Principal Site. However, Middle Street at this nearest point is dominated by fast-moving vehicles and consequently not considered to be attractive to recreational users such as cyclists; does not include a footway; and has no public stopping place. As such, visual sensitivity is considered to be lower than if such features or aspects were present; and effects are reduced accordingly.</p> <p>With reference to views from the A631, the Applicant does not consider that receptors using this route will be of high sensitivity. Traffic speeds are high, there is no footway or public stopping places; it is not likely to be attractive to recreational users nor is it noted for scenic quality. Whilst there will be significant effects during construction and operation year 1 (as illustrated by the photomontage for Viewpoint 20 (Figure 12-14 of the ES [APP-187])), visual effects are not considered to be significant at Year 15, when hedgerow and trees which are a typical element along other sections of the A631 will be established and screen solar infrastructure.</p> <p>With reference to views from St. Chad's Church, the surroundings of the raised bank upon the church in Harpswell is situated were visited by both Applicant's heritage and landscape consultants. Views were observed to be subject to screening by trees, therefore Viewpoint 3 (Figure 12-13 of the ES [APP-187]), which is from a more open and 'worst-case' location on a PRoW approximately 130 m to the west, was selected in preference. Visual effects from Viewpoint 3 were assessed to be not significant.</p> <p>Views across the Till Vale from Middle Street are considered in the response to visual effects from Middle Street, described above.</p> <p>With reference to views from Springthorpe village, no significant effects are expected from representative viewpoint 12 (Figure 12-13 of the ES [APP-187]), located on the eastern edge of the village on School Lane and at the closes point in the village (approximately 610 m) to the Principal Site. Views from within the village towards the Principal Site are very limited, due to the enclosed nature of built form and mature vegetation along the eastern edge. The Applicant notes that within the wider Springthorpe parish, along the permissive/voluntary footpath and bridleway east of Sturgate, no significant visual effects were recorded for representative viewpoints 10 (Figure 12-13 of the ES [APP-187]) and viewpoint 11 (Figure 12-14 of the ES [APP-187]).</p>
<p>REP2-043, REP2-045, REP2-049, REP2-054, REP2-060,REP2-012, REP2-051, REP2-052</p>	<p>Lincolnshire County Council, Glentworth Parish Council, Members of the Public</p>	<p>Landscape character</p>	<p>Concerns the Scheme will have a negative impact on and change the character of the local landscape.</p> <p>Concern the Scheme will impact on the character of Harpswell, Harpswell Grange, Hemswell Village, Corringham, Springthorpe, Heapham and Glentworth.</p>	<p>The Applicant has provided responses to concerns relating to the scale of the Scheme and its impact on the landscape in Table 2-12, page 271 of the Applicant's Response to Relevant Representations [REP1-028]. The Applicants responses relating to the historic landscape are set out in Table 2-2, RR Ref No. RR-165, pages 89 to 99 of the Applicant's Response to Relevant Representations [REP1-028].</p> <p>With reference to the Harpswell, Hemswell, Corringham, Springthorpe, Heapham and Glentworth, the Applicant has sought, through the identification of sensitive landscapes (including through the provision of a more detailed, project-specific landscape character assessment) and sensitive views to inform the Order limits associated with the Principal Site. Whilst the Applicant acknowledges that there will be a residual, significant effect on the wider character of the open landscape (LLCA 3A Till Vale) that</p>

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
				<p>encompasses the Principal Site between the villages listed, no significant residual effects are expected at year 15 for the LLCA associated with these settlements. The Applicant has sought to limit views from these locations through the provision of buffers to the settlements, focused mitigation including tree and hedge planting and the removal of solar infrastructure from certain fields west of Harpswell and Glentworth during the Scheme design.</p> <p>For Harpswell, the Applicant has paid particular attention to the higher sensitivity landscape associated with the former Harpswell Hall, a scheduled monument. Existing mature tree planting heavily limits views from the central green space that links the former Hall with the Grade I listed church. Where views are more open to the west, including from the former moat and those associated with the historic 'prospect mound', the nearest panels towards the west are located over 500 m distant. No significant visual effects are expected from representative viewpoint 14 (Figure 12-14 of the ES [APP-187]), which is located on the elevated, open edge of the moat.</p> <p>With reference to Hemswell, the nearest proposed solar infrastructure will be located over 800 m from the nearest (south-west) edge of the village. Visibility from within and the edge of the village is very limited, as indicated by representative viewpoint 16 (Figure 12-13 of the ES [APP-187]) at the southern end of Weldon Road, for which no significant visual effects are expected.</p> <p>The nearest proposed solar infrastructure will be approximately 1 km from the eastern edge of Corringham village. Visibility of the Scheme from the village will be very limited, with no significant effects expected for representative viewpoint 21 (Figure 12-13 of the ES [APP-187]) at Corringham Village Hall.</p> <p>With reference to Springthorpe village, no significant effects are expected from representative viewpoint 12 (Figure 12-13 of the ES [APP-187]), located on the eastern edge of the village on School Lane and at the closes point in the village (approximately 610 m) to the Principal Site. Views from within the village towards the Principal Site are very limited, due to the enclosed nature of built form and mature vegetation along the eastern edge. The Applicant notes that within the wider Springthorpe parish, along the permissive/voluntary footpath and bridleway east of Sturgate, no significant visual effects were recorded for representative viewpoints 10 (Figure 12-13 of the ES [APP-187]) and viewpoint 11 (Figure 12-14 of the ES [APP-187]).</p> <p>The nearest proposed infrastructure to Heapham will be located approximately 900 m east from the edge of the village, as measured from a point near the junction of Common Lane and Heapham Lane. No visibility of the Scheme is expected from within the village of Heapham. No significant visual effects are expected for representative viewpoint 16, on Common Lane, approximately 400 m east of this same location within Heapham.</p> <p>The Applicant has provided a response to comments relating to the character of Glentworth in Table 2-1, pages 28-31 of the Applicant's Response to Local Impact Reports [EN010142/APP/9.26].</p> <p>Harpswell Grange is a farmhouse located approximately 2 km west of Harpswell village, set within open farmland. As detailed in Chapter 8: Cultural Heritage Assessment of the ES [APP-043], the farm is recorded on the Lincolnshire Historic Environment Record and described as a partially extant 19th century farmstead which has experienced a significant loss (greater than 50%) of traditional buildings. Large modern sheds are located to the west of the farmhouse.</p>

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				<p>With respect to landscape and visual matters, the property is located approximately 280 m from the A631, which is the nearest publicly accessible location and from where views of the farmhouse include the modern barns, alongside two recently constructed properties adjacent to entrance drive. No significant effects in relation to the non-designated heritage asset are described in the Cultural Heritage Assessment. The Applicant acknowledges that Harpswell Grange lies within LLCA 3A Till Vale, for which the extents are illustrated in Figure 12-11 of the ES [APP-187] and that a residual significant landscape effect at all stages of the Scheme is assessed for LLCA 3A in Chapter 12: Landscape and Visual Impact of the ES [EN010142/APP/6.1(Rev01)]. However, the focus of the Scheme design around Harpswell Hall has been to reduce visual impacts for residential receptors, for which the Applicant has included setbacks and woodland or hedgerow mitigation through consultant with the residents. The farmhouse itself and associated landscape is not considered to be a sensitive receptor in landscape and visual terms.</p>
REP2-046	Members of the Public	Mitigation planting	<p>Comment that alterations to hedgerows would adversely affect the landscape's legibility and mitigation planting along the western side of the B1398 Middle Street would prevent the appreciation of a millennium change from a single, convenient vantage point.</p>	<p>The Applicant accepts that it is sometimes challenging to balance intentional screening of the Scheme against loss of views, as referenced in the photomontage for Viewpoint 4 at the Year 15 stage and provided in Figure 12-14 of the ES [APP-187]. Whilst the Applicant acknowledges the open views from this location, it is considered that visibility from the section of Middle Street between Glentworth and Harpswell is almost exclusively from fast-moving vehicles. There is no footway or public stopping place, and it is not generally considered to be a route that is attractive to recreational cyclists or walkers. The introduction of hedgerows along this section of road will change the open aspect but is not considered to represent a significant visual effect.</p> <p>The Applicant also notes that young hedge planting was present along the west side of Middle Street around the location of Viewpoint 4 during the summer of 2021, pre-dating the Scheme. Further to this, the Applicant understands that hedge planting was undertaken approximately 10 to 12 years ago along an approximately 170 m section of Middle Street, south of this viewpoint. As such, this view is likely to have become more limited regardless of the Scheme.</p>
REP2-046	Members of the Public	Screening	<p>Concerns that screening views will effectively block these views for the lifetime of the Scheme including views from A631 and from Common Lane</p>	<p>As stated in the response above, the Applicant acknowledges that there will be a loss of some wider, rural views (including towards the Cliff) following establishment of hedgerows. The Applicant accepts that the character of such routes, particularly Common Lane, will inevitably change. However, it is not considered that this change would be a significant visual effect, in that hedgerows are not uncharacteristic of the wider landscape and the absence of hedgerows is frequently a reflection of intensive agricultural practice and loss of more valued features, as set out in Chapter 12: Landscape and Visual Impact of the ES [EN010142/APP/6.1(Rev01)].</p>
REP2-057, REP2-074	Members of the Public	Screening	<p>Concerns that screening will not hide the industrial landscape as it will take 10-15 years to mature if it is installed at all</p>	<p>The level of screening by vegetation and timescales for maturity have been discussed in in Table 2.3, pages 20-21 of the Applicant's Response to Written Submissions at Deadline 1 [REP2-007].</p>
REP2-043, REP2-044, REP2-045, REP2-047, REP2-049, REP2-055,	Lincolnshire County Council, Glentworth Parish Council, Members of the Public	Scale	<p>Comments relating to the scale of the Scheme and its impact on the landscape, including historic landscape including industrialisation of a large area of countryside</p>	<p>The Applicant has provided responses to concerns relating to the scale of the Scheme and its impact on the landscape in Table 2-12, page 271 of the Applicant's Response to Relevant Representations [REP1-028]. The Applicant's responses relating to the historic landscape are set out in Table 2-2, RR Ref No. RR-165, pages 89 to 99 of the Applicant's Response to Relevant Representations [REP1-028].</p>

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<p>REP2-057, REP2-058, REP2-063, REP2-064, REP2-068, REP2-072, REP2-074, REP2-012, REP2-051, REP-052</p>				
Cultural heritage				
REP2-046	Members of the Public	Historic landscape character	<p>Concerns that the Scheme would prevent future ability to experience the historical development of Harpswell and wider landscape, and that the Scheme would be dominant in the landscape.</p> <p>Concerns around alterations to hedgerows and mitigation planting impacting historic views around Harpswell.</p> <p>Concerns that security fencing will constrain movement through the Harpswell landscape and impact on the historic landscape.</p>	<p>The Applicant acknowledges that there will be a residual, significant effect on the wider character of the open landscape (LLCA 3A Till Vale) that encompasses the Principal Site. Paragraph 12.8.14 in Chapter 12: Landscape and Visual Amenity of the ES [EN010142/APP/6.1(Rev01)] acknowledges that the operational life of the Scheme would be regarded as being close to a generational change in landscape character. Whilst the Scheme will occupy the majority of Harpswell parish, beyond the western boundary near Harpswell Wood, the Applicant has sought to provide a buffer around the more sensitive and accessible parts of the parish, including open and historic design views from the moat associated with the former Harpswell Hall.</p> <p>The Applicant is proposing to remove sections of hedgerows only where necessary and provide extensive new hedgerows, particularly to the west of the parish of Harpswell and along Common Lane. Whilst it is accepted that this will change the character of certain views, the Applicant does not consider the introduction of hedgerows to be incongruous with respect to the wider Till Vale landscape; and that the open character in part reflects modern, intensive agricultural practices.</p> <p>The layout of the Scheme will also retain the key elements of the historic landscape evidenced by the existing pattern and grain of medium and large sized fields with predominantly straight, linear boundaries which characterise the largely post-medieval enclosure landscape and those more isolated remnants of the earlier, medieval activity such as the surviving earthwork remains of ridge and furrow cultivation.</p> <p>With respect to the view from Middle Street to the west of the Principal Site, the Applicant acknowledges the loss of this view, but notes that this view is largely experienced from vehicles moving at speed, and with no opportunity to stop and appreciate this particular view from any public location. Furthermore, hedge planting has been undertaken along this section of Middle Street prior to the initial stages of the Scheme, such that the view may have become more limited regardless of any mitigation proposed.</p> <p>As set out in the Outline Design Principles Statement [EN010142/APP/7.4(Rev02)] the proposed deer fencing along the outer boundaries of the Principal Site will be maximum 2.5m in height and comprise timber posts and agricultural wire. The appearance of this is not considered to accord with typical 'security' fencing: such fencing (e.g. steel palisade) will only be located around critical infrastructure within the substations. The deer fencing will surround the panels and prevent browsing to new hedgerow, shrubs and trees; and will not constrain any movement along publicly accessible routes through the landscape.</p>

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Glint and glare				
REP2-043, REP2-054	Members of the Public	Glint and glare	Concerns relating to the impact of glint and glare on local residents, airfields and aircraft	The Applicant has provided responses to concerns relating to the impact of glint and glare on local residents, airfields and aircrafts in Table 2-19, page 293 of the Applicant's Response to Relevant Representations [REP1-028] , which states that the glint and glare assessment presented in Chapter 17: Other Environmental Topics of the ES [APP-048] and Appendix 17-2: Glint and Glare Assessment of the ES [APP-120] concluded that, with the proposed embedded design mitigation, no significant residual effects are anticipated as a result of the Scheme, including upon residential, road and aviation receptors.
Solar energy				
REP2-047, REP2-058	Members of the Public	Connection	Comment that the Scheme is too far from the point of connection and will therefore lose power / efficiency along the route	Section 4.5 of Chapter 4: Alternatives and Design Evolution of the ES [APP-035] sets out the methodology adopted in relation to the site selection process for the Principal Site. The Principal Site for the Scheme was chosen following a five stage process from the determination of an initial search area based upon considerations of irradiance (sunlight) and the identification of relatively low lying and flat topography to maximise energy generation within the east of England. The characteristics of the land in this part of Lincolnshire are optimal for the generation of renewable energy by solar PV, as it has good levels of irradiation and large areas of flat land. From this baseline, a Point of Connection search was then undertaken by the Applicant. The search area was then refined through the application of exclusionary criteria based upon environmental and planning constraints. The availability and suitability of previously developed land was also considered. The location of the Scheme is a suitable and available location that avoids environmental, planning and land use constraints and opportunities, whilst being able to connect to the National Grid Cottam Substation. From the most basic electrical perspective, it may be true that power losses may occur over long distances; however, the Scheme mitigates this by connecting at 400kV, significantly reducing transmission losses over the connection distance. The transmission grid operates at this voltage specifically to efficiently transmit electricity over tens or even hundreds of kilometres, ensuring minimal energy loss and reliable delivery.
REP2-051, REP2-052, REP2-047, REP2-050, REP2-053, REP2-056, REP2-058, REP2-062, REP2-063, REP2-070	Glentworth Parish Council, Members of the Public	Efficiency of Solar	Comment querying the claimed energy production of the Scheme, in particular the amount of electricity that would be generated at those times of year when the demand would be at its highest, i.e. during the winter. Comments relating to the efficiency of solar.	The Applicant has provided a response to comments relating to efficiency of solar in Table 2-22 on page 298 of the Applicant's Response to Relevant Representations [REP1-028] . The Applicant has also produced a technical note on generating capacity and associated development at Appendix B of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-046] which explains the role of the BESS in ensuring that energy is captured and stored efficiently during periods of peak generation and can be made available for use throughout the year.
Documentation				
REP2-044	Members of the Public	Application documents	Comment that documentation and statistics may have been manipulated to give the impression that the Scheme is suitable	An Environmental Impact Assessment (EIA) of the Scheme has been carried out in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Ref 1-35) and is reported within the Environmental Statement [APP-031 to APP-208] submitted with the Application. The Applicant considers the EIA undertaken for the Scheme as presented within the Environmental Statement and Environmental Statement Addendum [AS-057] is robust. It is worth noting that the Planning Inspectorate, in deciding to accept the Application for examination, has not raised concerns

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				with the adequacy of the Environmental Statement provided. The EIA was carried out by AECOM Ltd (AECOM) on behalf of the Applicant. AECOM is an IEMA Registered Impact Assessor and holds the IEMA EIA Quality Mark as recognition of the quality of AECOM's EIA product and continuous training of their environmental consultants. Appendix 1-3: EIA Statement of Competence of the ES [APP-053] outlines the relevant expertise or qualifications of the experts at AECOM who prepared the ES, including the relevant topic assessments.
REP2-044	Members of the Public	Application documents	Request for up to date, relevant, locally researched information on the potential effects of the Scheme that takes into account all aspects of the construction process and ongoing operation of the projects	The Applicant considers the EIA undertaken for the Scheme as presented within the Environmental Statement [APP-031 to APP-208] and Environmental Statement Addendum [AS-057] is robust, considering all aspects relevant to the impact assessment as presented in Chapter 3: Scheme Description of the ES [EN010142/APP/6.1(Rev02)] in order to establish the potential for likely significant effects associated with the Scheme and in-combination with relevant cumulative schemes in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Ref 1-35). The datasets used in the ES and ES Addendum are the most up to date datasets available at the time of writing, and datasets were selected taking into account their robustness. The EIA was carried out by AECOM Ltd (AECOM) on behalf of the Applicant. AECOM is an IEMA Registered Impact Assessor and holds the IEMA EIA Quality Mark as recognition of the quality of AECOM's EIA product and continuous training of their environmental consultants. Appendix 1-3: EIA Statement of Competence of the ES [APP-053] outlines the relevant expertise or qualifications of the experts at AECOM who prepared the ES, including the relevant topic assessments.
Flood risk, hydrology, and drainage				
REP2-016, REP2-017, REP2-051, REP-052	West Lindsey District Council, Glentworth Parish Council	Flooding	Concerns over flood risk due to natural topography of the land	The Applicant has responded to comments relating to flood risk in Table 2-10 of the Applicant's Response to Relevant Representations [REP1-028] .
Draft Development Consent Order				
REP2-016, REP2-017	West Lindsey District Council	Schedule 17	Concerns regarding the timeframes within Schedule 17 for the discharge of requirements. Request the timeframes applied in the Cottam Solar Project to be included instead.	WLDC raised this request at the Issue Specific Hearing held on 15 October 2024. The Applicant responded at that hearing, and provided further information at page 23 of the Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 1 [REP1-046] , setting out its justification for the timeframes included within the current draft of Schedule 17 within the draft DCO [EN010142/APP/3.1(Rev04)] . The Applicant refers WLDC to that response in respect of these concerns.
REP2-016, REP2-017	West Lindsey District Council	Fees	Request that the fee provision included within the Cottam Solar Project Order be included in Schedule 17.	WLDC raised this request at the Issue Specific hearing held on 15 October 2024. As confirmed at page 23 of the Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 1 [REP1-046] , the Applicant has already made subsequent updates to Schedule 17 within the draft DCO [EN010142/APP/3.1(Rev04)] for Deadline 1 to include a fee schedule for the discharge of requirements. The fees are in accordance with those in the Cottam Solar Project Order 2024, and with those set out in the Deadline 2 submission by WLDC. The Applicant therefore considers these comments have been addressed.
Supply chain and engagement				
REP2-016	West Lindsey District Council	Supply chain	Comment that the Council would welcome confirmation from the applicant, Tillbridge Solar Limited, that	The Applicant is committed to maintaining high standards throughout all its activities, including through its procurement and within its supply chain. The Applicant is making commitments within its DCO to secure this. Requirement 19 of Schedule 2 set out within the draft DCO [EN010142/APP/3.1(Rev04)]

Ref. No.	IP Name	Theme	Written Submission / Summary of Written Submission	Applicants Response to Written Submission
			all aspects of the project, including organisation values, use of human resources, supply chain management and approach to engagement with local communities will be governed by appropriate values and ethics.	<p data-bbox="1427 275 2807 449"><i>establishes that: 'no part of the authorised development may commence until a skills, supply chain and employment plan in relation to that part has been submitted to and approved by the relevant planning authority for that part or, where the part falls within the administrative areas of multiple planning authorities, each of the relevant planning authorities, in consultation with Lincolnshire County Council.'</i></p> <p data-bbox="1427 485 2807 659">The above requirement is supported by a commitment that the skills, supply chain and employment plan must be substantially in accordance with the Framework Skills, Supply Chain and Employment Plan [APP-232]. Within the Framework Skills, Supply Chain and Employment Plan, the Applicant sets out its proposed ethical procurement policy under section 5.4.11. This includes measures to guard against any unethical practices in the supply chain.</p> <p data-bbox="1427 695 2807 827">The Applicant looks forward to working with the local authorities to refine and agree its approach to supply chain and employment ahead of construction and procurement taking place, including any specific comments or suggestions they may have on the Framework Skills, Supply Chain and Employment Plan [APP-232].</p> <p data-bbox="1427 863 2807 932">With regard to community engagement, the Applicant has engaged with the community extensively during the pre-application phase and has continued to engage throughout the Examination.</p> <p data-bbox="1427 968 2807 1136">Requirement 4 of the draft DCO [EN010142/APP/3.1(Rev04)] requires the establishment of a community liaison group prior to the commencement of development whose terms of reference must be approved by the relevant planning authority, The community liaison group will provide a means for the Applicant to collaborate and communicate with local residents. This will help to alleviate concerns about each phase of the Scheme, thereby supporting health and well-being</p>

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