FENWICK SOLAR FARM

Fenwick Solar Farm
EN010152

Applicant's Response to Relevant Representations

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1. Introduction

1.1 Purpose of this Document

1.1.1 The purpose of this report is to provide Fenwick Solar Project Limited's (the Applicant) response to the key issues raised in relevant representations submitted by Interested Parties in relation to the Fenwick Solar Farm (the Scheme).

1.1.2 The Development Consent Order (DCO) application (the Application) for Fenwick Solar Farm was submitted on 1 November 2024 and accepted for Examination on 29 November 2024. The period when Interested Parties could submit Relevant Representations (RR) on the Application was from 18 December 2024 to 27 January 2025. The RRs received were published on the Planning Inspectorate's project website on 07 February 2025.

1.1.3 A total of 57 responses were received during the RR period. On the 11 February 2025 and 26 February 2025, the ExA accepted additional responses from Broadfield Law UK LLP on behalf of Elba Securities and Able UK Ltd and Cathy Linsley, respectively. These consultees were not registered with a RR reference number; therefore, the examination library reference number has been used when referring to these responses within this document.

1.2 Structure of this Document

1.2.1 This report provides a response from the Applicant to the matters raised in the relevant representations and is structured as follows:

a. Tables 2-1: provides the Applicant's responses to relevant representations from Local Authorities, who are listed in Table 1-1 below.

b. Table 2-2: provides the Applicant's responses to relevant representations from Parish Councils, who are listed in Table 1-2 below.

c. Table 2-3 to 2-4: provides the Applicant's responses to relevant representations from Non-Statutory Organisations, who are listed in Table 1-3 below.

d. Table 2-5 to 2-13: provides the Applicant's responses to relevant representations from Statutory Consultees, who are listed in Table 1-4 below.

e. Table 2-14: provides the Applicant's responses to relevant representations from Persons with Interest in the Land, who are listed in Table 1-5 below.

f. Table 2-15: provides the Applicant's responses to relevant representations from the Public.

1.2.2 RRs are presented as verbatim text taken from Relevant Representations and are then responded to by setting out the Applicant's position on the matter at the time of writing.

1.2.3 This document provides a substantive response to the comments raised in the RRs. However, issues of agreement and ongoing discussions are detailed in the Statements of Common Ground. The Examining Authority should refer to those documents to understand the current position between

the parties on these matters. The reference number column in the tables below refers to the reference given to the RRs in the Examination Library, aside from Broadfield Law UK LLP on behalf of Elba Securities and Able UK Ltd and Cathy Lindley, where the examination reference has been used.

1.2.4 The documents submitted with the Application are also referenced in this document, using the reference number e.g. [APP/x.y], where the last two/three numbers are the application document number, as set out in the Examination Library. All documents are also presented in numerical order in the **Guide to the Application [APP-212]**.

Table 1-1 List of Local Authorities who submitted Relevant Representations

Reference Number	Local Authority
RR-001	City of Doncaster Council

Table 1-2 List of Parish Councils who submitted Relevant Representations

Reference Number	Parish Councils
RR-002	Moss & District Parish Council

Table 1-3 List of Non-Statutory Organisations who submitted Relevant Representations

Reference Number	Non-Statutory Organisations
RR-011	The Burnet Heritage trust
RR-019	Yorkshire Wildlife Trust

Table 1-4 List of Statutory Consultees who submitted Relevant Representations

Reference Number	Statutory Consultees
RR-003	Environment Agency
RR-004	National Grid Electricity Transmission plc
RR-005	National Highways
RR-006	Natural England
RR-007	Network Rail Infrastructure Ltd
RR-008	Office of Road and Rail
RR-009	South Yorkshire Fire and Rescue Service
RR-013	Danvm Drainage Commissioners
RR-018	Northern Powergrid (Yorkshire) plc

Table 1-5 List of Persons with an Interest in the Land who submitted Relevant Representations

Reference Number	Persons with an Interest in the Land
RR-015	Fidra Energy - Thorpe Marsh Green Energy Hub
RR-016	H J Banks and Company Ltd
RR-024	Christopher Tonkinson
RR-026	Clifford Braham
RR-030	Debbie Braham
RR-031	Elizabeth Lois Dobbin
RR-049	Stephen Fowle
RR-051	Steven Mason
RR-052	Sylvia Wisniewska
AS-003	Broadfield Law UK LLP on behalf of Elba Securities and Able UK Ltd

Table 1-6 List of the Public who submitted Relevant Representations

Reference Number	Public
RR-010	Brason Transport Ltd
RR-012	Caegurwen and Penllerfedwen Commoners Association
RR-014	Fenwick Solar Farm Action Group
RR-017	Moss and Fenwick Village Hall
RR-020	Amitava Sett
RR-021	Catherine Mason
RR-022	Christine Marshall
RR-023	Christine Murray
RR-025	Claire Grossmith
RR-027	Darren Marshall
RR-028	David Beastall
RR-029	David Howe
RR-032	Glynn Courtney
RR-033	Graham Alan Wingfield
RR-034	James Walters

Reference Number	Public
RR-035	Jane Beastall
RR-036	Janet Clark
RR-037	Janet Raynor
RR-038	John O'Loughlin
RR-039	Kristian Carr
RR-040	Lorraine Anne Connolly
RR-041	Mark Henstock
RR-042	Nikki Newton
RR-043	Oliver Hayes
RR-044	Oxer Shane
RR-045	Paul Anthony Connolly
RR-046	Robert Johnson
RR-047	Ross Evans
RR-048	Sharon Wilson
RR-050	Stephen Sidebottom
RR-053	Thomas Benjamin Moyes
RR-054	Tom Moyes
RR-055	Vicky Lawson
AS-004	Cathy Lindley

1.2.5 For ease of reference, a table of acronyms used in this document is provided in Table 1-7 of this document.

Table 1-7 Abbreviations

Abbreviation	Definition
AEP	Annual Exceedance Probability
AGL	Above Ground Level
ALC	Agricultural Land Classification
AMS	Archaeological Mitigation Strategy
BESS	Battery Energy Storage System
BMS	Building Management System
BMV	Best and Most Versatile
BNG	Biodiversity Net Gain
BPM	Best Practicable Means

Abbreviation	Definition
BSMP	Battery Safety Management Plan
CBF	Community Benefit Funds
CCGT	Combined Cycle Gas Turbine
CCTV	Closed-Circuit Television
CEMP	Construction Environmental Management Plan
CfD	Contracts for Difference
CL:AIRE	Contaminated Land: Applications in Real Environments
CTMP	Construction Traffic Management Plan
dB	Decibels
dBA	Decibels A-weighted
DBA	Desk-Based Assessment
DCO	Development Consent Order
DEMP	Decommissioning Environmental Management Plan
DLL	District Level Licencing
DMP	Dust Management Plan
DoW: CoP	Definition of Waste: Code of Practice
ECoW	Ecological Clerk of Works
EN-1	Overarching National Policy Statement for Energy
EN-3	National Policy Statement for Renewable Energy
ERP	Emergency Response Plan
ES	Environmental Statement
GCN	Great Crested Newt
GVA	Gross Value Added
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
IBC	Intermediate Bulk Containers
INNS	Invasive Non-Native Species
LCCC	Low Carbon Contracts Company
LEMP	Landscape Environmental Management Plan
LGP	Low Ground Pressure
LPA	Local Planning Authority
MAFF	Ministry of Agriculture and Fisheries
NFCC	National Fire Chiefs Council
NFPA	National Fire Protection Association
NGET	National Grid Electricity Transmission
NMU	Non-Motorised Users

Abbreviation	Definition
NRMM	Non-Road Mobile Machinery
NVZ	Nitrate Vulnerable Zone
OEM	Original Equipment Manufacturer
OEMP	Operational Environmental Management Plan
OMH	Open Mosaic Habitat
PEIR	Preliminary Environmental Information Report
PFAS	Polyfluoroalkyl substances
PRoW	Public Right of Way
PRoWMP	Public Right of Way Management Plan
RR	Relevant Representations
SINC	Site of Importance for Nature Conservation
SMP	Soil Management Plan
SoCG	Statement of Common Ground
SPA	Special Protection Area
SPZ	Source Protection Zone
SRN	Strategic Road Network
SSCAP	Skills, Supply Chain and Employment Plan
SSSI	Site of Specific Scientific Interest
SuDS	Sustainable Drainage Systems
SYAS	South Yorkshire Archaeological Service
SYFRS	South Yorkshire Fire and Rescue Service
TMMS	Traffic Management Monitoring System
WMP	Water Management Plan
ZOI	Zone of Influence

2. Applicant's Response to Relevant Representations

2.1 Local Authorities

Table 2-1 Applicant's Response to Relevant Representations – Local Authorities

Comments from Relevant Representation	Response to Relevant Representation
City of Doncaster Council (City of Doncaster Council) is aware that as the host Authority we will be automatically registered as an Interested Party in the Examination, under Section 102(1)(c) of the Planning Act 2008, and therefore the Council's views will be considered for the duration of the Examination. This letter – being the Council's Relevant Representation - provides a summary of the main aspects of the proposal with which the Council agrees and/or disagrees together with explanations as appropriate. To assist the Examining Authority in forming its initial assessment of principal issues in advance of the preparation of the draft examination timetable, and ahead of the submission of our Local Impact Report, City of Doncaster Council wishes to make the following initial representation to identify its main areas of interest at this stage in relation to the Development Consent Order Application. City of Doncaster Council acknowledges that there is a recognised need and support for renewable and low carbon energy technology through national planning policy and that the proposed development would contribute towards the targets set for the UK's greenhouse gas emission reduction and increasing the country's energy supply from more renewable sources. Equally, promotion of renewable and low carbon sources of energy in suitable locations across the Borough are central to achieving our commitments on both reducing carbon emissions and combating the effects of climate change.	The Applicant notes this comment.
City of Doncaster Council considers that the main issues arising from the proposed Fenwick Solar Farm project at this stage are as follows: • Cultural heritage • Ecological impacts and considerations, including mitigation and enhancement measures and securing biodiversity net gain. • Landscape and visual impacts. • Socio-economic impacts including the loss of agricultural land, potential employment generation and effects on public rights of way. • Transport and access impacts. • Ensuring noise and vibration impacts to key receptors are taken into account and properly mitigated where necessary and that glint and glare impacts in respect of Doncaster Sheffield Airport are properly assessed City of Doncaster Council will, at the required time, be producing a Local Impact Report which will set out its position in full in respect of these issues, but to assist at this stage, they are further discussed below.	Noted. Responses to the points raised in relation to these topics are provided below.
Cultural Heritage (Chapter 7) In terms of built heritage, City of Doncaster Council notes that there are no designated heritage assets located within the site boundary. Further, it acknowledges that the assessment of effects in respect of Cultural Heritage has been undertaken while taking embedded mitigation for the scheme into account. These measures include landscaping/screening around parts of the perimeter of the Scheme and heritage buffer areas around heritage assets (such as Scheduled Monuments and listed buildings) are intended to reduce impacts on the setting of heritage assets.	The Applicant notes this comment.

Comments from Relevant Representation	Response to Relevant Representation
Overall, City of Doncaster Council in its Statutory Consultation response stated that certain identified built heritage assets are rather run down and noted that vacant farmhouses and farm buildings may be suitable for some refurbishment. There is acknowledgement that there is a likelihood within the lifetime of the development buildings around/close to Fenwick Hall and Lily Hall may move towards an alternative residential use and that the proximity of the development has the potential to affect this, possibly in terms of noise and vibration. It is however understood that operational noise levels on a worst-case scenario basis are predicted to be low, as set out in the ES. It is further understood that Requirement 14 of Schedule 2 of the Draft Development Consent Order (EN010152/APP/3.1) seeks to secure this position. At the time of writing, City of Doncaster Council continues to review the submission with a view to ensuring a suitable noise environment for those presently uninhabited buildings would prevail in the event that residential occupation did commence in the future and this will be addressed further where necessary in the Local Impact Report.	Noted. The Applicant has previously indicated to City of Doncaster Council that the level of noise from solar farm infrastructure predicted at Riddings Farm and Fenwick Hall is 35 decibels (dB) LAeq,T, which is equivalent to a whisper or the level of noise that you may experience in a library. This is a conservative prediction where plant is operating at full capacity and only likely to occur during hot days. Schedule 2, Requirement 14 of the **Draft DCO [APP-220]**, will ensure that operational noise levels remain consistent with those set out within Table 11-7 of **Volume I, Chapter 11: Noise and Vibration [APP-063]**. The Applicant can continue its engagement with City of Doncaster Council if any further understanding is required.
Turning to below-ground heritage, City of Doncaster Council has sought the views of the South Yorkshire Archaeology Service (SYAS) who have provided detailed advice, which is set out in full below. SYAS have advised that a comprehensive scheme of archaeological assessment and evaluation was initiated by the applicants and their archaeological consultants. This comprised a desk-based assessment (EN010152-000101-6.3 Appendix 7-2 Cultural Heritage Desk Based Assessment), geophysical survey (EN010152-000103-6.3 Appendix 7-4 Geophysical Survey Report) and programme of trial trenching. The results have fed into Chapter 7 Cultural Heritage (EN010152-000081-6.1 Chapter 7 Cultural Heritage) of the Environmental Statement (ES). Details of the trial trenching are based on an interim report (ASWYAS 2024 Fenwick Solar Farm, Fenwick, South Yorkshire Archaeological Evaluation by Trial Trenching Interim Report) as the full report containing the detailed assessment was still under preparation at the time of writing the ES.	**Volume III, Appendix 7-2: Cultural Heritage Desk-Based Assessment [APP-142]**, supported by the results of **Volume III, Appendix 7-4: Geophysical Survey Report [APP-144]** and trial trench evaluation, were undertaken within the Solar PV Site. The interim results of the trial trench evaluation were summarised in the Desk Based Assessment. The full assessment report for the trial trench evaluation was shared with the South Yorkshire Archaeology Service (SYAS) on 10 February 2025 and is submitted into Examination at Deadline 1 following agreement of the report by SYAS. The Desk-Based Assessment (DBA) has been updated with the full results of the trial trench evaluation and is submitted into Examination at Deadline 1.
The applicants and their archaeological consultants have maintained detailed consultation with SYAS throughout the process. Consequently, SYAS are satisfied that the archaeological work provides a satisfactory level of information to understand the impact of the scheme. The caveat to this position is that minor revisions are likely to be required to the archaeological programme for the site once the full trial trenching report is received. It is understood that the full report will be submitted shortly. Similarly, a lack of detail regarding the grid connection method means that assessment of the potential grid connection corridor relies only on desk-based information at this point. However, given the overall size of the scheme, these are minor matters that do not compromise the understanding of archaeological significance and sufficient provisions are included to address these points later in the process.	The full assessment report for the trial trench evaluation was shared with SYAS on 10 February 2025 and is submitted into Examination at Deadline 1 following agreement of the report by SYAS.
The desk-based assessment established the baseline conditions identifying known designated and non-designated heritage assets within the site boundary and wider study area. This was enhanced by the geophysical survey which recorded anomalies of archaeological interest across the site. The programme of trial trenching targeted those anomalies in addition to features characterised as of uncertain origin and areas which appeared devoid of any archaeological remains. There are no designated heritage assets within the site boundary but Fenwick Hall moated site, a scheduled monument (NHLE:1012459) is surrounded by the scheme. This is a medieval manorial site traditionally linked with the Foliot family. Earthworks extend beyond the scheduled area, perhaps indicating a village associated with the manorial site and the ridge and furrow farming remains in the surrounding fields. A heritage buffer was agreed with Historic England excluding the site and other earthworks from the development at an early stage. The buried archaeological remains within the site are identified as nondesignated heritage assets with archaeological interest. Predominantly, they date to the late prehistoric (Iron Age) and into the Romano-British period. There may be some isolated features of earlier date, but the specialist analyses of the trial trenching results are awaited to confirm this. Broadly the archaeological features take two forms. In the	'Heritage Buffer Areas' have been incorporated into the Scheme design to reduce impacts on heritage assets, including the scheduled monument Fenwick Hall moated site and archaeological remains. These 'Heritage Buffer Areas' are presented on **Volume II, Figure 2-3: Indicative Site Layout Plan [APP-074]** and have been agreed with Historic England and SYAS.

Comments from Relevant Representation	Response to Relevant Representation
northern part of the site, there are a series of discrete rectangular or square enclosures containing internal features which mostly appear to represent roundhouses. The enclosures are not linked by trackways or embedded within field systems suggesting a non-agricultural context with connections to the adjacent River Went. In the southern part of the site, a pattern of enclosures embedded within a co-axial field system with trackways presents a more typical Iron Age/ Romano-British archaeological form. Finds recovered during the trenching include handmade pottery (which may be of prehistoric date), Roman and medieval pottery, flint, coins, animal bones, shell, slag and other industrial residues, metal objects and a quernstone (for grinding grain) fragment, glass, fired clay, charcoal, daub and ceramic building materials. Other important features include a possible ladder settlement (a series of conjoined enclosures of probable Romano-British date) and an enclosure containing multiple internal features. These areas were not subject to trial trenching due to the low impact of the scheme within those areas. The areas were proposed for ecological mitigation but will now also be identified as a 'Heritage Buffer Areas'.	
These types of archaeological features are susceptible to damage and destruction through the various types of groundworks associated with the proposed scheme. The ES includes a detailed description of relevant policy pertaining to archaeological matters and the applicants have acknowledged this and submitted a draft Archaeological Mitigation Strategy (EN010152-000072-7.19 Draft Archaeological Mitigation Strategy). This document establishes a role for an Archaeological Clerk of Works (ACoW) to oversee the programme of mitigation on behalf of the applicants. SYAS welcomes this and sees it as an essential step to ensuring that the work proceeds as planned.	The Applicant notes this comment.
The Draft Archaeological Mitigation Strategy (dAMS) outlines a series of measures to mitigate the impact of the scheme on the archaeological remains. These include: a) Preservation in-situ through exclusion of the area from construction and operation and maintenance. b) Preservation in-situ through the use of surface-mounted pre-cast concrete blocks. c) Targeted excavation (strip, map & record). d) Completion of trial trenching in formerly restricted areas. e) Evaluation and possible mitigation in grid connection corridor. These measures will provide appropriate mitigation for the impact of the scheme but it is noted that some revision to the areas selected for mitigation will be required on receipt of full trial trenching report.	The **Draft Archaeological Mitigation Strategy (AMS) [APP-209]** sets out the provisions for a series of mitigation measures that have been agreed with Historic England and SYAS. The Draft AMS has been compiled and agreed based on the interim results of the trial trench evaluation. The full assessment report for the trial trench evaluation was shared with SYAS on 10 February 2025 and is submitted into Examination at Deadline 1, following agreement of the report by SYAS. The framework mitigation methodology has been agreed by SYAS following review and acceptance of the final fieldwork report for the trial trenching. This is set out in the **Framework AMS [EN010152/APP/8.16]** submitted at Deadline 1 and the final detailed mitigation strategies will be set out in the Final AMS secured through Requirement 10 of the **Draft DCO [APP-220]**.
In addition, regarding (b), the use of surface-mounted pre-cast concrete blocks is to ensure minimal ground disturbance to areas where important archaeological remains are to be preserved in situ. The Outline Design Parameters Statement (EN010152-000056-7.4 Outline Design Parameters Statement) stipulate that Solar PV Mounting Structures will not be piled in areas requiring archaeological mitigation and that electrical cables will also be run above ground. An allowance of 100mm below current ground level is made for ground levelling required for the installation of the concrete blocks. Detailed information on the location of other elements which could cause disturbance, for example field stations, is not currently available. As such, it should be made clear that no ground disturbance beyond the 100mm levelling allowance is to take place in the archaeological mitigation areas where preservation in situ is to be achieved. A distinction should also be made between the types of archaeological mitigation. These stipulations only apply to areas requiring preservation in situ. Areas where archaeological mitigation consisting of 'targeted excavation (strip, map & record)' has been completed, can be subject to ground disturbance through piling and cabling as the archaeological evidence will have been recorded.	Receipt of the full assessment report for the trial trench evaluation has allowed further engagement with SYAS. The framework mitigation methodology has been agreed with SYAS following review and acceptance of the final fieldwork report for the trial trenching. This is set out in the **Framework AMS [EN010152/APP/8.16]** submitted at Deadline 1 and the final detailed mitigation strategies will be set out post consent in the Final AMS secured through Requirement 10 of the **Draft DCO [APP-220]**.
The Framework OEMP (EN010152-000060-7.8 Framework Operational Environmental Management Plan) and Framework DEMP (EN010152-000061-7.9 Framework Decommissioning Environmental Management Plan) identify no or limited physical impacts on archaeological features as these will have already occurred	As set out within the **Framework AMS [EN010152/APP/8.16]** submitted at Deadline 1, following the completion of the further evaluation surveys and agreement of final mitigation strategies for each mitigation area post consent, a Final AMS will be prepared and agreed with SYAS. The

Comments from Relevant Representation	Response to Relevant Representation
during the construction phase. Whilst this is substantially correct, there is a minor threat to the archaeological mitigation areas preserved in situ through a lack of information. The methodology to be included within the detailed OEMP for heritage buffer areas should be extended to include the archaeological mitigation areas preserved in situ, where applicable, include a plan showing those areas and stipulate like for like replacement. Similarly, the detailed DEMP should include a plan showing the archaeological mitigation areas preserved in situ and make provision for decommissioning methods to be assessed by the ACoW and SYAS (or its successor).	detailed Operational Environmental Management Plan (OEMP) and Decommissioning Environmental Management Plan (DEMP) will take into account the final mitigation strategies set out within the Final AMS and will include plans showing areas where preservation in-situ of archaeological remains is required.
The Framework LEMP (EN010152-000066-7.14 Framework Landscape and Ecological Management Plan) makes provision for wetland scrapes within the River Went riparian corridor. This area was excluded from archaeological investigation as it was to be a low impact area with no development. Trial trenching adjacent to this area identified a series of unusual Iron Age/ Romano-British activity areas linked to the river corridor. These archaeological features are very likely to extend into the River Went riparian corridor. The scrapes have a maximum depth of c.50cm whilst topsoil depth in the adjacent trenches is often only 25cm35cm. The wetland scrapes could therefore harm any archaeological features present, and mitigation is required.	The framework mitigation methodology has been agreed with SYAS following review and acceptance of the final fieldwork report for the trial trenching. This is set out in the **Framework AMS [EN010152/APP/8.16]** submitted at Deadline 1 and the final detailed mitigation strategies will be set out post consent in the Final AMS secured through Requirement 10 of the **Draft DCO [APP-220].** This includes the requirement for an archaeological watching brief (mitigation Area 14) within the riparian corridor along the River Went which has been agreed with SYAS.
Regarding (d), trial trenching could not proceed in four fields due to ecological constraints (NW3, NW8, NW10, SE5). SYAS advise that trenching would still be required in three fields (NW3, NW8, NW10) but that this could be carried out post-consent as part of any mitigation strategy. Sufficient information was available from results around field SE5 to confirm a negligible potential and it was agreed the trenching here could be removed from the assessment.	At the time of the DCO application submission, Fields NW3, NW10 and SE5 were not subject to trial trench evaluation due to ecological constraints. SYAS have agreed that, based on sufficient baseline information obtained to date, Field SE5 can be descoped from requiring any further work. Fields NW3, NW8 and NW10 will be subject to trial trench evaluation which will be undertaken post-consent, which is set out within the **Draft AMS [APP-209]**. Any mitigation strategies that may be required following the results of the trial trench evaluation within these fields will be agreed with SYAS. Potential mitigation strategies that may be required are set out within the **Draft AMS [APP-209]**. The framework mitigation methodology has been agreed following review and acceptance of the final fieldwork report for the trial trenching. This is set out in the **Framework AMS [EN010152/APP/8.16]** submitted at Deadline 1 and the final detailed mitigation strategies will be set out post consent in the Final AMS secured through Requirement 10 of the **Draft DCO [APP-220]**.
Regarding (e), no fieldwork has taken place within the grid connection corridor due to uncertainties about the method of connection. SYAS advise that, should the corridor be required, a geophysical survey should be undertaken in the first instance followed by a programme of trial trenching and that the results should be used to inform any further work. SYAS agreed that this could be undertaken post consent as part of the mitigation strategy.	As agreed with SYAS and set out at Section 3.3 of the **Draft AMS [APP-209]**, geophysical survey of the Grid Connection Corridor is proposed if the Grid Connection Corridor option is selected as the method of connection at detailed design.
Ecological Impacts and Biodiversity Net Gain (Chapter 8) At this stage, City of Doncaster Council notes the following: <u>Survey work:</u> The extent, range and timing of survey work is summarised in Table 8-1, which addresses protected species, priority species, faunal groups, and priority habitats. Surveys have been carried out during optimal periods over the years 2023 - 2024 with commencement in February 2023 of habitat surveys, followed on by faunal surveys. Table 8.1 states: "Surveys have not been undertaken along the cable route as suitable habitat for reptiles is limited and there will be no permanent loss of habitat or displacement of populations". Question is raised as to whether there would be impacts arising if a high voltage cable is to be laid, particularly if the duration of works is unavoidably prolonged. Accordingly, it would be useful to understand whether any precautionary measures can be identified and whether there will be specific reasonable avoidance measures where surveys have not been carried out. Further reassurances on this would be welcomed as the process continues.	Table 8-10 of **Volume I, Chapter 8: Ecology [APP-060]** sets out the embedded avoidance and mitigation measures in relation to reptiles. Table 8-12 provides an assessment of impacts on reptiles within the Order limits. For the Grid Connection Corridor, where suitable habitat occurs, the presence of reptiles has been assumed and precautionary working methods and reasonable avoidance measures will be employed to avoid injuring or harming any reptile species that may be present. All habitats will be re-instated following cable installation. The requirement for precautionary working methods and reasonable avoidance measures are set in Table 3-3: Ecology of the **Framework Construction Environmental Management Plan (CEMP) [APP-196]**, with specific measures for reptiles included on pages 26 and 27 (Removal of vegetation present within the Order limits) and page 34, which states: "*c. Reasonable avoidance measures would be used during clearance of any habitat suitable for reptiles and amphibians, to minimise the risk of injury/killing including phased clearance of vegetation to gradually reduce suitability for reptiles and amphibians, thereby encouraging animals to move away from affected areas into adjacent suitable habitat;"*.

Comments from Relevant Representation	Response to Relevant Representation
Furthermore, it is understood that a separate Amphibian Survey has not been undertaken, however it is appreciated that the applicant is intending to adopt a District Level Licencing approach, although presently there is no direct reference to this. Confirmation on this matter as the process continues would therefore be helpful.	No specific surveys were undertaken for amphibians although, where observed as part of other ecological surveys, e.g., refugia surveys, they were noted and recorded. As set out in section 8.4.21 of **Volume I, Chapter 8: Ecology [APP-060]**, the Scheme will apply for a Great Crested Newt District Level Licence on receipt of consent. The Applicant continues to engage with Natural England to finalise the Impact Assessment Compensation Payment Certificate. Irrespective of this, measures set out in Table 8-10 of **Volume I, Chapter 8: Ecology [APP-060]** include those to avoid and minimise impacts to common amphibian species.
Biodiversity Net Gain The applicant has set out that based on the current plans for the Solar PV Site, the Scheme is predicted to result in a net gain of 36.46% for area-based habitat units, a net gain of 62.75%for hedgerow units, and a net gain of 24.97% for watercourse units (EN010152/APP/7.11 -Biodiversity Net Gain Assessment). It is set out further that this is likely to underestimate the actual BNG that will be achieved by the Scheme, as the assessment has been carried out based on maximum design principles, including maximum footprint of infrastructure and maximum clearance of vegetation for construction. City of Doncaster Council therefore understands that the Applicant therefore commits to achieving a minimum 10% BNG for each unit and will demonstrate this via an updated BNG assessment prior to construction. It should be noted that given the scale and nature of the proposed development City of Doncaster Council will expect the project to deliver more than 10% wherever possible to do so. In this respect, it is considered that a generalised approach to post-development habitats has been utilised. The UKHabs Classification System version 2.01 identifies that the habitat below solar panels should be identified as u1b6 with the strips of open habitat between the panels being recorded separately. It is understood that the BNG condition assessments were carried out between February 2023 and August 2024. Whilst the rationale for this is accepted, City of Doncaster Council would ask that consideration be given to any potential changes to the widespread cropland. As the DCO process moves forward, it should be acknowledged that some areas of arable land baseline habitat may be left uncultivated and the nature of them may change from cropland to some other transitional habitat. If this is the case, the BNG baseline should reflect this.	The Scheme is committed to deliver Biodiversity Net Gain (BNG) in accordance with Schedule 2, Requirement 7 of the **Draft DCO [APP-220]**, which states: *"—(1) No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority for that part, in consultation with the relevant statutory nature conservation body. (2) The biodiversity net gain strategy must be substantially in accordance with the framework landscape and ecological management plan and must be implemented as approved. (3) The biodiversity net gain strategy must be maintained throughout the operation of the relevant part of the authorised development to which the plan relates."* The updated Biodiversity Net Gain required by the above will be supported by pre-construction surveys, as set out in the **Framework Landscape and Ecological Management Plan (LEMP) [APP-203]**. This will capture any changes to pre and post-development habitats and designs. As is discussed in Section 2.9.1 and assumption b. of the **BNG Assessment [APP-200]**, assumption b, the Applicant's approach challenges the UKHab guidance with reference to guidance published by Building Research Establishment which recognises that on average 95% of a site used for solar farm development is *"still accessible for plant growth and potentially for wildlife enhancements and complementary agricultural activities such as conservation grazing".* Therefore, an approach of 95% of the Solar PV Panel footprint within the Site has been categorised as the 'Grassland – Modified grassland', with the remaining 5% categorised as 'Urban – Developed land; sealed surface' to consider the Solar PV Panel and supporting infrastructure. This approach is understood to be supported by the Royal Society for the Protection of Birds and will be reflected in the management of the grassland habitats and adjusted accordingly to maintain grassland cover. This approach has been accepted in numerous other solar projects that have undergone examination and/ or been granted Development Consent Orders (including Cottam Solar (https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010133) and Gate Burton Energy Park (https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010131).
The Tables provided in Appendix F contain some errors which would benefit from correction. Furthermore, some inconsistencies in how data is represented could be addressed to assist with the interpretation of that data. City of Doncaster Council has made the applicant aware of these apparent errors and inconsistencies and would be grateful if these could be rectified accordingly. City of Doncaster Council welcomes ongoing engagement with the Applicant in relation to Ecology and BNG matters and welcomes the Applicant's commitment to delivering BNG across the site.	Appendix F of the **BNG Assessment [APP-200]** has been updated and submitted into Examination at Deadline 1.
Landscape and Visual Impact (Chapter 10) It is understood that embedded mitigation has been included in the scheme with the aim of reducing the potential for significant landscape and visual effects. Details of the landscape measures embedded into the design, including a summary of their environmental function, is set out within the Framework LEMP (EN010152-000066-7.14 Framework Landscape and Ecological Management Plan).	The Applicant has separately responded on 30 January 2025 to the landscape review undertaken by LUC on behalf of City of Doncaster Council. Further engagement between the Applicant, City of Doncaster Council and LUC has taken place between February and April. Further information has also been submitted to City of Doncaster Council/LUC prior to Deadline 1. Engagement between the Applicant, LUC and City of Doncaster Council will continue with City of Doncaster Council/LUC during May with the aim of arriving at an agreed position for

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The site is extensive, extending across a large area of low-lying agricultural land located between the settlements of Fenwick, Moss and Topham. The area of the site accommodating the solar panels is crossed by a number of drainage ditches (including Fleet Drain), minor roads / access tracks and a network of Public Rights of Way (PRoW). The grid connection corridor follows a north-south alignment from Moss to the Thorpe Marsh substation, located to the west of Barnby Dun. Given the way the proposed project relates to settlements and communities, a key issue will be its effects upon local residents and users of the PRoW network, including how they experience the local landscape. The project has potential to give rise to significant adverse landscape and visual effects due to its scale and extent, and the availability of open views to the proposed development, as part of a wide panorama. As such, and to support and inform City of Doncaster Council's involvement in the DCO process, expert landscape advice has been sought. There is therefore ongoing dialogue between the parties in respect of landscape impacts, and the matters summarised below. At the time of writing, and in terms specifically of an assessment of effects, mitigation and design, the advice provided on City of Doncaster Council's behalf is broadly summarised as follows.	Deadline 2.
Assessment of effects • Assessment on the effects on the landscape character and elements of the Site as a receptor within the landscape assessment should be included. • Effects on residents should be considered in terms of their wider experience of living in each community – e.g. their approach and departure from the village, use of community spaces and local paths and lanes, not just individual views from each property and associated garden. • Magnitude of change judgements to ensure that residual effects have not been underrepresented, noting that this is a very large-scale project, should be reviewed. • Rationale for inclusion of the schemes within the cumulative assessment (e.g. radius of search) should be confirmed. It would be helpful to provide tables setting out the process for assessing cumulative effects. • Confirmation is requested that task-specific lighting has been considered as part of the visual assessment at construction within the LVIA.	Please see the above response.
Mitigation and design • Information should be provided on how landscape mitigation will be secured and how this will be incorporated into contractual requirements to ensure happens and is maintained for the duration of operation. • Site-specific recommendations listed in the 'soft landscape proposals' section should be reviewed. It is noted that sections of hedgerow due to be removed are shown on the supporting figures within the Hedgerow Report (EN010152/APP/6.3 - Volume III Appendix 8-5: Hedgerow Report). However, it would be helpful to express the extent of these removals in linear metres so that landscape effects can be fully understood.	Please see the above response.
• Proposed specification and build-up of the proposed access track running north from Moss Road should be confirmed. • Strategy to ensure the siting of fencing is not oppressive to PRoW users should be produced. This should be read in conjunction with comments made regarding Chapter12 which provides further information on fencing and the use of barbed wire.	Please see the above response.
• Outline a Strategy for the future re-use of existing farm buildings and structures across the Site should be outlined. This should be linked to the comments made regarding Chapter 7 and the future viable uses of heritage assets in the vicinity.	Please see the above response.

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• Opportunity to pull-back the footprint of the proposed development scheme where it surrounds local settlements at close proximity, principally Fenwick, West End and Moss should be explored. This matter is expanded on further below and should also be read in conjunction with the discussion on loss best and most versatile agricultural land in respect of Chapter 12.	Please see the above response.
• The Framework LEMP includes indicative planting mixes for the soft landscape proposals. The proposed hedgerow mix (Table 1 in Framework LEMP) includes an appropriate range of native species. Hawthorn (30%) and blackthorn (30%) form the dominant species. However, the Applicant could consider reducing the % of blackthorn to allow for the introduction of spindle into the mix (at a similar proportion to dog rose and guelder rose) to reflect species present. The proposed species composition of hedgerow trees also seems reasonable. The inclusion of species such as field maple, poplar and oak is reflective of existing hedgerow trees within the Site and Study Area. However, it is recommended that oak is used as the dominant species due to its contribution to local landscape character. Table 2 in the Framework LEMP does not indicate a % breakdown of species within the hedgerow tree mix so it is requested that this detail is provided. • The Framework LEMP includes reference to a height of at least 3.5m at which hedgerows are due to be maintained. It is recommended that this height should be varied across the Site to reflect local landscape character, with the potential to increase the height to help reduce the availability of open views.	Please see the above response.
• Access strategy to promote the continued use of the PRoW network in the Site and wider Study Area should be produced. This should be linked to the comments made regarding Chapter 12 and the PRoW network, particularly the use of fencing and gated accesses and how best to achieve inclusivity for users.	Please see the above response.
In terms of the siting of the solar panels across the site, due to the proposed scale, City of Doncaster Council would welcome the applicant exploring any opportunities to pull-back the footprint where it appears to surround local settlements at close proximity, principally Fenwick, West End and Moss. For example, the following positive revisions could be made to the layout of solar PV panels across the Site: • Omit the rectilinear parcel of land accommodating solar PV panels adjoining West Lane. The existing woodland cover forms a robust boundary. • Integrate an increased offset from the solar PV panels and residential properties located on Lawn Lane, Fenwick. Although the Proposed Development includes a proposed screening area in this location, it is recommended that the offset is increased to avoid effects on the closer part of the outlook experienced by residents. • Omit the outlier parcels of land accommodating solar PV panels to the north-west of Jett Hall and: • Reduce solar PV panel coverage to the north-east of the Site where the landscape is characterised by smaller-scale pasture and water meadows, giving it scenic qualities and an increased sensitivity.	Please see the above response.
Additionally, it should be noted that South Yorkshire Police have raised with City of Doncaster Council that largescale solar farms can be targeted for crime, and that this is general concern for them. Usually, the suggestion to overcome this risk centres on substantial physical barriers to provide security but it is well accepted that these can appear intrusive and cause landscape harm. In this respect, the adopted Local Plan aims to create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Policy 47 specifically sets out that developments will be supported which are designed in a way that reduces the risk of crime and the fear of crime. The policy references support for development which (inter alia) includes security fencing (where appropriate) that provides a robust and effective barrier but does not contribute to a hostile appearance. The ES, at Chapter 2, outlines the security measures incorporated in the design of the scheme. Proposed	The Applicant notes this comment.

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fencing has been designed to minimise its visual prominence during operation, incorporating stock proof, or other mesh-type fencing, at a maximum height of 2.2m. It is also understood that security will be provided via pole mounted internal facing closed circuit television (CCTV) systems are proposed around the perimeter of the operational areas of the Solar PV Site. Ultimately, City of Doncaster Council would agree that this strikes an appropriate balance to achieving security to the site and would not wish to see any more substantial barriers in situ to address the risk of crime, and it is not considered that it would be appropriate to incorporate further physical barriers.	
Socio-economics and land use (Chapter 12) *Best and Most Versatile (BMV) agricultural land and soils* City of Doncaster Council understands that approximately 7% of land surveyed within the Solar PV Site is classified as BMV land, 6% of which is subgrade 3a and 1% is Grade 2. The site is therefore predominantly located in ALC Grade 3b land (87%) (non-BMV land) and the remaining land comprises Grade 4 (3%) ALC and non-agricultural land (3%). It is also understood that permanent land take will be required within the site for the construction of the On-Site Substation (1.99 ha); however, this land has been surveyed as Grade 3b (therefore not BMV land). Permanent land take will also be required for structural planting (7.54 ha); of this, 59.5 sqm will be Grade 2 and 7,740.9 sqm will be Grade 3a. Therefore, less than 1 ha of permanent land take (7,800.5 sq m) will be BMV land. The applicant therefore submits that the magnitude of impact is thus assessed to be very low, and the effect of the scheme on the use of BMV agricultural land is assessed by them to be negligible.	The Applicant notes this comment.
Measures to mitigate against damage to the structure, function and resilience of soil resources during construction and operation and maintenance are set out in the Framework CEMP(EN010152/APP/7.7 Framework Construction Environmental Management Plan) and the Framework OEMP (EN010152-000060-7.8 Framework Operational Environmental Management Plan). A Framework SMP (EN010152/APP/7.10 Framework Soil Management Plan) has also been prepared. The Framework SMP includes measures to ensure that soil quality is not degraded during construction and operation and maintenance. Requirement 15 in Schedule 2 of the Draft DCO secures the approval of a detailed SMP, which must be substantially in accordance with the Framework SMP and implemented as subsequently approved.	The Applicant notes this comment.
Agriculture is the main land use within the Borough making up nearly two thirds of the total land area. The soils found in the Borough vary in quality from high-grade arable farmland (grades 2 and 3) and its extensive network of drains and channels in the east of the Borough, land reclamation on former colliery sites, through to remediated brownfield sites within former industrial areas. Around half of the land area of the Borough is given over to arable farming. The adopted local plan recognises that Doncaster's high quality agricultural land needs to be protected from inappropriate development so that we can maximise its economic benefits such as local food production. The local plan goes on to set out that where significant development is unavoidable, preference will be given to the use of poorer quality agricultural land in preference to higher quality land. Care should also be taken to avoid damage or disturbance to soils of high environmental value and other soils that contribute significantly to ecosystem services. Local plan policy 60 refers specifically to the protection of BMV and the need to conserve and minimise the loss of Doncaster's extensive area of high-quality arable farmland, noting that agriculture is the main land use within Doncaster, making up nearly two thirds of the total area. City of Doncaster Council accepts that only a relatively small proportion of the agricultural land is BMV land (less than 20 ha) and furthermore agrees that overall, the loss of the BMV agricultural land is temporary and reversible (after operation for the Solar PV Site and after construction for the Grid Connection Corridor). It also appreciates what is said regarding the lack of any suitable and available areas of	The Applicant notes this comment.

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brownfield or non-agricultural land at the appropriate scale having been identified.	
City of Doncaster Council welcomes the fact that the scheme has been designed to consider the quality of agricultural land insofar as practicable such as positioning the permanent infrastructure to avoid BMV land and avoiding other socio-economic and other sensitive environmental receptors. However, it is requested that further consideration is given to excluding the south-western fields referenced 5/02 and the field to the north of this – as these areas contain both Grade 2 and subgrade 3a soils. This would also have the consequence of creating a larger buffer between the development and Jett Hall/the settlement of Moss. This is also a point of consideration emphasised in the discussion in respect of Chapter 10 and removing these areas from the developable area would also have positive consequences from this perspective. City of Doncaster Council would therefore welcome the opportunity to continue to work with the applicant on this aspect of the scheme to establish any scope for a further reduction to BMV loss, with the further positive consequence of reducing landscape impact and increasing the buffer to Moss.	The Applicant has considered City of Doncaster Council's suggestion but does not intend to remove the southwestern fields from the Scheme. In summary, this is because: a) there is an urgent national need for 'critical national priority' infrastructure; b) there is a lack of suitable and available alternative sites; c) the design has sited permanent elements (such as the substation) outside of BMV land; and d) the impact on BMV land is reversible, as construction and operation of the Scheme in these fields (in accordance with the **Framework Soil Management Plan (SMP) [APP-199]**) will not impact on the grading of the land, and once the Scheme is decommissioned the land will be available for agricultural use again (and is secured by Schedule 2, Requirements 18 of the **Draft DCO [APP-220]**). Consequently, **Volume I, Chapter 12: Socio-Economics and Land Use [APP-064]** concludes that the Scheme will have a negligible effect on the use of BMV agricultural land. Even if residual effects were identified, Paragraph 4.1.7 of the Overarching National Policy Statement for Energy (EN-1) states that, for projects which qualify as CNP infrastructure (such as the Scheme), the need case will generally outweigh the residual effects in *"all but the most exceptional cases".* None of the exceptional circumstances set out in Paragraph 4.1.7 apply in respect of the Scheme. City of Doncaster Council also notes that the removal of the fields would create a larger buffer with Jett Hall and the settlement of Moss. This is considered in the Applicant's response of 30 January 2025 to the landscape review undertaken by LUC on behalf of City of Doncaster Council. It should also be noted that the owner-occupier of Jett Hall supports the inclusion of the southern western fields within the Scheme. Engagement between the Applicant, LUC and City of Doncaster Council continues in respect of landscape and visual matters.
Public Rights of Way (PRoW) Commentary concerning the PRoW network is addressed below within the context of ES Chapter 12, but it should be noted that where relevant may reference other, related ES Chapters. Broadly, these are summarised as follows: In respect of Figure 2-3 (Indicative Site layout Plan): 12.3.18 refers to the proposed permanent diversion of footpath No.29 Sykehouse. This will also involve part of footpath No.12 Fenwick, which No.29 joins and the eastern part of footpath No.10 Fenwick. Since earlier discussions with the applicant, City of Doncaster Council can confirm it has received a definitive map modification order application to upgrade footpath No. 29 Sykehouse and footpath No.12 Fenwick to bridleway. The applicants have been made aware of this and is referenced further in the document at paragraphs 12.5.73, 12.6.10 and 12.7.31.	The Applicant notes that City of Doncaster Council informed them about the definitive map modification order application. Consequently, Paragraphs 12.5.73, 12.6.10 and 12.7.31 of **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** confirms that, if the application is accepted and the upgrade is confirmed, the Applicant will ensure that the diverted Sykehouse 29 route meets the requirements for a bridleway.
12.3.19 …indicating that the network is mostly used by local residents for recreational purposes such as dog walking and guided walks by equestrians… The applicant has previously been advised that the rights of way network is mostly used by the local community for recreation, with some use by groups leading guided walks around the area. The network mainly comprises public footpaths, but some are used by equestrians. It would therefore be helpful for clarification to be provided.	Paragraph 12.3.19 of Volume I, Chapter 12: Socio-Economics and Land Use has been updated and submitted into Examination at Deadline 1 as follows: *"The Council also provided baseline context on the existing PRoW network within the Solar PV Site, indicating that the network is mostly used by the local community ~~residents~~ for recreational purposes such as dog walking ~~and,~~ with some use by groups leading guided walks around the area ~~by equestrians~~, and that the usage tended to be low compared to paths in the town centre or urban fringe. The Council also confirmed that the network mainly comprises public footpaths, but some are used by equestrians".*

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	The above does not result in any changes to the conclusions of the assessment of equestrians in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]**.
12.5.26 …there are currently no bridleways within the Solar PV site although there are two located along or abutting it. See comment above regarding application to upgrade footpath 29 Sykehouse and footpath No.12 Fenwick to bridleway.	Paragraph 12.5.6 of **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** describes the current baseline. Reference is made to the application to upgrade 29 Sykehouse and Fenwick 12 to bridleway in Paragraph 12.5.73 because this is where the future baseline is described. The assessment in Paragraph 12.6.10 that the diversion of a Public Right of Way (PRoW) Sykehouse 29 footpath would constitute a not significant effect remains valid. As noted in Paragraph 12.6.10, if the application is accepted and the upgrade is confirmed, the Applicant will ensure that the diverted Sykehouse 29 route meets the requirements for a bridleway.
In respect of ES Chapter 13 (Transport and Access), the following comments are noted: 13.5.17 states PRoW Fenwick 16 exists on the northern side of Haggs Lane and separation between vehicles and the PRoW will be managed through the measures described in the Framework PRoW Management Plan. To clarify, public footpath No.16 does not exist just on the northern side of Haggs Lane, it exists across the entire width of Haggs Lane.	Paragraph 13.5.17 of Volume I, Chapter 13: Transport and Access has been updated and submitted into Examination at Deadline 1 as follows: *"PRoW Fenwick 16 exists on the entire width ~~northern side~~ of Haggs Lane…"*
13.5.24 Should also be reference to the Trans Pennine Trail, which NCN 62 is part of.	Paragraph 13.5.24 of Chapter 13: Transport and Access has been updated and submitted into Examination at Deadline 1 as follows: *"…The nearest section of the National Cycle Network is part of Route 62 (which also forms part of the Trans Pennine Trail) and lies approximately 4km to the east and south of the Solar PV Site…".*
13.5.26 …In addition, it has been observed that several footpath bridges were showing vegetation growing completely across them indicating there had been no recent usage at all. I don't agree that bridges with vegetation growing across them indicates no recent use. Depending on the type of vegetation, users can get past by moving vegetation with little or no disturbance. We've also had issues carrying out our maintenance schedule so many of the paths/bridges went uncut for long periods. Again, this is not an indication of the lack of use.	Paragraph 13.5.26 of Chapter 13: Transport and Access of the Environmental Statement has been updated and submitted into Examination at Deadline 1 as follows: *"In addition, it has been observed that several footpath bridges were showing vegetation growing completely across them ~~indicating there had been no recent usage at all~~".*
The following comments are provided in respect of EN010152/APP/7.13 Framework Public Rights of Way Management Plan: 1.3.2 … indicating that the network is mostly used by local residents for recreational purposes such as dog walking and guided walks by equestrians … see previous comments regarding this wording.	Paragraph 1.3.2 of the Framework Public Right of Way Management Plan has been updated and submitted into Examination at Deadline 1 as follows: *"…the network is mostly used by the local community ~~residents~~ for recreational purposes such as dog walking, with some use by groups leading ~~and~~ guided walks around the area, ~~by equestrians~~ and that the usage tended to be low compared to paths in the town centre or urban fringe".*
1.3.4 states it was agreed with the Council the definitive map is incorrect. This is an error – it was agreed the routes walked by the public differ to the definitive map, not that the map is incorrect.	Paragraphs 1.3.4 of the Framework Public Right of Way Management Plan (PRoWMP) has been updated and submitted into Examination at Deadline 1 as follows: *"…It was agreed with City of Doncaster Council that the routes walked by the public differ to the definitive map ~~was incorrect~~ and that users followed a path that is similar to the suggested permanent diversions…"*
2.1.5 & 2.1.6 See previous comments about the TPT and NCN62 being one and the same route.	Paragraph 2.1.6 of the Framework PRoWMP has been updated and submitted into Examination at Deadline 1 as follows: *"…National Cycle Route 62 is the nearest national cycle route (which also forms part of the Trans Pennine Trail), approximately…"*
4.1.2 a. Maintaining access to all existing PRoW within the Order limits;… Question whether this includes the routine maintenance, i.e., clearing the upgrowth from the surface twice yearly, during the growing	Upgrowth will be cleared from the surface twice yearly during the construction phase. In respect of the operation phase, engagement will be undertaken with City of Doncaster Council during

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season?	the preparation of the final Public Right of Way Management Plan and the Operational Environmental Management Plan post-consent, which are both secured by Schedule 2, Requirements 12 and 17 of the **Draft DCO [APP-220]**.
4.1.3 refers to minimum widths being incorporated into the scheme for PROW. The widths are based on Schedule 12A of the HA1980 for restoration of paths where the width is not proven, so could be used for the temporary diversions but will not be suitable for the permanent diversions which should specify an actual width in line with our Local Plan.	The actual widths would be set out in line with the Local Plan for any permanent diversions. It is recommended that the detail be discussed and agreed between the Applicant and City of Doncaster Council during the preparation of the detailed design and Public Right of Way Management Plan which are secured by Schedule 2, Requirements 4 and 17 of the **Draft DCO [APP-220]**.
In respect of EN010152/APP/2.3 Streets Rights of Way and Access Plan: Plans reference national Cycle Route 62. It should be referred to as the Trans Pennine Trail, see previous comments above.	National Cycle Route 62 is recognised as part of the Trans Pennine Trail and this is reflected in the above proposed changes to Volume I, Chapter 13: Transport and Access and the Framework PRoWMP. The Streets, Rights of Way and Access Plan has also been updated (by adding *'(Trans Pennine Trail)'* to the legend) and submitted into Examination at Deadline 1.
Authorisation of use of Motor vehicles over public right of way. – There are implications for future maintenance of the path surface, who will be responsible for maintenance? As highway authority City of Doncaster Council has a duty to maintain routes to a standard suitable for their intended use, i.e., as footpaths. Many of these paths are currently dirt or stone surfaces. Will the surface be improved to accommodate vehicles and if so, what is proposed? If this is already provided within the documentation, it would be helpful for this to be highlighted.	Authorisation of Motor Vehicles, as denoted by the **Streets, Rights of Way and Access Plans [APP-215]** have currently been developed on a conservative basis to allow for any internal track or haul route to be modified in accordance with the Work areas identified in the **Works Plans [APP-214]**. In many instances, motor vehicles will only be crossing the Public Right of Way rather than running along its full defined length and therefore any potential damage to the surface will be isolated. Notwithstanding the above, it is recommended that maintenance of Public Rights of Ways be discussed and agreed between the Applicant and City of Doncaster Council during the preparation of the Public Right of Way Management Plan and the Operational Environmental Management Plan which are both secured by Schedule 2, Requirements 12 and 17 of the **Draft DCO [APP-220]**.
Additionally, City of Doncaster Council notes the following: • Where references are made to fencing being installed around the site, any barbed wire should be on the inside of the fence and not on the path side, where applicable (see Chapter 2, 2.7.11 and 2.7.68)	The Applicant notes that if barbed wire is used, it will only be on the top of the fencing around the substation and/or Battery Energy Storage System (BESS) Area to deter people climbing over the fence at approximately 2.2m high. It's unlikely that the use of barbed wire will be required, but the Applicant wishes to retain the flexibility for its use should it be required.
• Where references are made to the inclusion of access gates where site accesses are also public rights of way, these gates should be designed to be the least restrictive possible so as not to unduly impede legitimate users of the public right of way (see Figure 2-3 (Indicative Site layout Plan), Sheet 6 of 11, Chapter 13 13.5.16, Appendix L3: Plans of the proposed solar farm and cable route). These observations have been shared with the applicant to enable them to consider and respond where possible to do so at this stage and City of Doncaster Council welcomes the opportunity to discuss further.	The proposed access gates, identified in **Volume II, Figure 2-3: Indicative Site Layout Plan [APP-074]** are required to restrict access to any land where Solar PV Panels or high voltage equipment may be in operation. The location of the proposed access gates in the Indicative Site Layout Plan have been devised to not interact with any existing or permanent diversion of the Public Right of Way network. Therefore, users of the Public Right of Way will be able to navigate through the site free of these obstructions.
Employment generation The estimated construction phase is expected to be 12 months for the Grid Connection Corridor and 24 months for the Solar PV Site. Although construction jobs are temporary, they represent a positive economic effect for a substantial period. It is estimated that the Scheme will require a peak workforce of 250 full-time equivalent (FTE) staff per day and create an average of 200 gross FTE jobs on-site per day during the construction phase (assumed to be equivalent to 200 FTE jobs per annum). Of these construction jobs, 45% are expected to be taken up by people living within 60 minutes travel time of the Solar PV Site. The Framework Skills Employment and Supply Chain Plan [EN010152/APP/7.15] sets out a variety of interventions which the Applicant proposes to pursue post consent to maximise the economic benefits of	The Applicant welcomes the offer to engage with City of Doncaster Council via the Doncaster Delivering Together Strategy and proposes that this be undertaken during the preparation of the final Skills, Supply Chain and Employment Plan post-consent secured by Schedule 2, Requirement 16 of the **Draft DCO [APP-220]**.

Comments from Relevant Representation	Response to Relevant Representation
the scheme, for example promoting local employment, apprenticeships, and education. City of Doncaster Council have already set out to the applicant that it would welcome the opportunity to engage in further dialogue in how these economic benefits of the scheme could be maximised during the construction phase, via the Doncaster Delivering Together Strategy.	
Transport & Access (Chapter 13) City of Doncaster Council are the statutory Highway Authority for the area and therefore have made a detailed review of the submission to ensure all relevant matters are given due consideration throughout the process and with a view to highlighting any necessary restrictions or requirements that may have implications for the applicant, including for their timetable as the process continues. In summary, the documentation provides significant information relating to vehicle routing, numbers, sizes and timings, mitigation measures, as well as swept path analysis to ensure that the proposed junctions from the adopted highway, are wide enough and fit for purpose for the delivery and transportation of all materials to the different parts of the site. The exact details of the proposed widening works for all these junctions, have been provided within the CTMP (EN010152/APP/7.17 Framework Construction Traffic Management Plan), using the swept path analysis for the largest vehicles using the individual junctions i.e. 16.5m articulated HGV or Tractor and Trailor. The swept path analysis for these junctions using the two vehicles previously listed is agreed. However, the applicant has stated that 5No. AIL's (Abnormal Indivisible Loads) will require access to site and further information will be required in this respect in due course. For example, the vehicle type, routing and associated swept path analysis. Whilst this information may be unknown at this time, the applicant should be aware that no such movements will be allowed until City of Doncaster Council's Abnormal Loads procedures have been followed and the movements agreed.	Abnormal Load Deliveries to the Solar PV Site will be solely via Access 1, presented in Appendix A of the **Framework Construction Traffic Management Plan (CTMP) [APP-206, APP-207]**. As part of the swept path analysis undertaken, the Applicant has considered an Abnormal Load Delivery accessing and egressing this access. It should be noted that any access into and out of Access 1 will need to be undertaken under escort, with road traffic held until the manoeuvre has been completed. It should also be noted that the Abnormal Load shown is indicative only and represents the approximate vehicle size/arrangement anticipated for the transformer delivery. The specific size and arrangement will be determined by the appointed heavy haulage contractor and included in the Construction Traffic Management Plan secured by Schedule 2, Requirement 13 of the **Draft DCO [APP-220]**. It is expected that the Abnormal Loads Officer will be consulted during the preparation of the final Construction Traffic Management Plan post-consent as secured by Schedule 2, Requirement 13 of the **Draft DCO [APP-220]** and in relation to Article 15 which relates to agreements with street authorities.
It should also be noted that all works to widen alter the highway will require Section 278 agreements to be entered into which should be factored into the programme as the process progresses.	The **Draft DCO [APP-220]** provides sufficient powers within Articles 8–16 for the undertaker to carry out highways works, including those to widen and alter highways and local roads, which negates the need for Section 278 agreements to legally permit such works. These powers are constrained by various approval rights retained by the local highway / street authorities to ensure works are designed and completed to the reasonable satisfaction of the street authority. These matters are also outlined in greater detail within the **Framework CTMP [APP-206, APP-207]**, which is secured by Schedule 2, Requirement 13 of the **Draft DCO [APP-220]** and requires the final Construction Traffic Management Plan to be approved by City of Doncaster Council, in consultation with the relevant highway authority. The approach to highways alterations set out in these articles and requirements is standard form drafting included in all solar DCOs to date. As such, the Applicant does not consider Section 278 agreements are required. It is however noted that Article 15 of the **Draft DCO [APP-220]** provides a framework for street and highways authorities to enter into agreements in respect of the above powers within the Order. This enables bespoke agreements to be entered into between the highways authority and the undertaker which include any further matters the highways authority would usually expect to capture within Section 278 agreements and ensure these align with the powers as they apply from the DCO. The Applicant and City of Doncaster Council are engaging further on such as agreement.
Further, in respect of EN010152/APP/7.17 Framework Construction Traffic Management Plan specifically, the following is provided: A detailed review setting out where there may be a need for further documents, clarification or corrections is summarised below:	The vehicle routing will be from the A19, then continuing along Moss Road and turning onto Fenwick Common Lane. Vehicles would therefore not use Fenwick Lane. This routing will be included in the Construction CTMP secured by Schedule 2, Requirement 13 of the draft DCO **[APP-220]** and will also be shared with all workers on site to ensure adherence to the route. If

Comments from Relevant Representation	Response to Relevant Representation
At Page 5 2.3.14, it states that it is proposed that Fenwick Common Lane will provide access for inbound construction staff (and minibuses) only. Other construction vehicles, including HGVs, will use the main construction access off Moss Road. It is agreed that Fenwick Common Lane is used as a designated route, but City of Doncaster Council wishes to flag that consideration should be given as to whether a prohibition should be included to prevent the use of the nearby Fenwick Lane which due to its width / alignment is unacceptable for any route to any site. If this could be expressly included within the Framework Construction Traffic Management Plan, this would be welcomed.	the Scheme workers did not comply with the CTMP and its routing, then City of Doncaster Council could pursue enforcement action under the Planning Act to ensure compliance under Requirement 13. The CTMP and DCO Requirement therefore already apply as a prohibition on the use of Fenwick Lane.
At Page 10 4.4, vehicle-swept paths demonstrate that construction vehicles will be able to turn in/out of the proposed Site accesses. It further sets out that traffic marshals will be in place to control HGV movements at the access to ensure these movements are carried out safely. An appropriate level of visibility will be achievable to/from the access, as set out above. In this respect, City of Doncaster Council would advise that further information is required in respect of Traffic Marshalls, including confirmation as to what qualifications they will be required to hold in order to control traffic on the highway. It should be noted that a Banksman does not have that authority, and a clear distinction therefore needs to be made within the document.	The **Traffic Regulation Measures Plan [APP-009]** identify that either a Banksperson or Traffic Signal Control will be utilised where access locations will be constructed or widened. This will allow the Contractor the necessary flexibility to introduce a form of traffic control that is both appropriate and safe for the type of works being undertaken. Banksperson control is primarily targeted at ensuring that construction vehicles can egress onto the Local Highway Network safely.
In terms of Temporary Traffic Management (page 11, 5.2.4), the document sets out that the Grid Connection Corridor will require temporary traffic management at several points along the road network during the construction phase, to allow construction vehicles to safely cross and access cable routes sections, as well as organising traffic to avoid impacts on the road network and traffic. Minor temporary works taking place at the A19/Moss Road junction in Askern will also require temporary traffic management. It goes on to state (at 5.2.5) that where necessary, temporary traffic signals are proposed to mitigate the impact of the laying of the cable, along busier roads. Where roads are less busy, traffic management will be conducted by laymen. Any such works will require a 'Permit to Work', managed by the council's Streetworks team. Any works relating to temporary traffic signals require authorisation and should be coordinated with other works ongoing within the vicinity. Enshrining these requirements within the documents would be useful. Similarly, any temporary traffic management measures to facilitate implementation to be set out within the detailed CTMP should be informed by the contractor and the local highway authority, including on site where deemed necessary.	The Applicant notes the request and confirms that, where any works require temporary traffic management or traffic signals, it will seek the necessary Permit to Work in consultation with City of Doncaster Council's Street Works team. A new Article 8A has been proposed into the draft DCO at Deadline 1 to further provide for the interaction between City of Doncaster Council's permitting scheme and the DCO streetworks provisions. Any proposals to install temporary traffic management will be suitably co-ordinated with other roadworks in the vicinity to minimise disruption to local traffic via this permitting process and the measures set out within the CTMP.
Page 29 Shows a diagram of Haggs Lane at the junction of Fenwick Common Road, however, can't find a drawing for: - Haggs Lane at the junction with the A614 Selby Road. Further clarification to ensure sufficient visibility splays can be provided here would be welcomed, and it is suggested that as a minimum there should be advance junction signs erected on the A614 on both approaches to indicate that vehicles will be emerging / turning into this lane.	Haggs Lane does not link to the A614, which is located approximately 7km to the east of Haggs Lane. Access 4, which denotes the access off Fenwick Common Lane onto Haggs Lane and is provided in Appendix A of the **Framework CTMP [APP-206, APP-207]** contains the proposed construction signage that will be installed to make road users and Public Right of Way users aware of construction workforce vehicle traffic utilising this route. It should be noted that access via Haggs Lane will be one way, with no vehicles egressing onto Fenwick Common Lane. A detailed Construction Traffic Management Plan is to be secured by Schedule 2, Requirement 13 of the **Draft DCO [APP-220]**.
ES Chapter 13 Future Baseline (page 23 13.5.10) – City of Doncaster Council considers this requires correction - The A19 at Askern joins Station Road (not Moss Road) and it is a junction with signals on 4 approaches High Street / not a 3 arm signalled junction as stated. Selby Road is the road from the North / High Street from the South / Station Road to the East and Swan Court to the West. Construction and Decommissioning Phase (page 41, 13.6.6) – again, requires correction as 'Off peak hours' are stated as being between 0900hrs and	Paragraph 13.5.10 of Volume I, Chapter 13 Transport and Access has been updated and submitted into Examination at Deadline 1 as follows: *"From the west the A19 runs for approximately 18km between the M62 Junction 34 and St Mary's Roundabout in Doncaster to the west of the Scheme. The A19 passes through more built-up areas such as Whitley to the north of the A19 and Askern, where it joins with Station ~~Moss~~ Road via a 4~~3~~-arm signalised junction".*

Comments from Relevant Representation	Response to Relevant Representation
1700hrs. However, the council defines 'off peak' periods as being between 0930hrs and 1530hrs which not only ensures the busier school drop off / pick up times are protected, but also heavy traffic on route to and leaving premises during core working hours. This should be taken into account.	The traditional network peak hours of 08:00-09:00 and 17:00-18:00 were assumed as part of the assessment. Table 7 of the **Transport Assessment [APP-179]** identifies the majority of movements within the hours of 06:00-07:00 and 18:00-19:00 which would be outside of the extended peak hours indicated by City of Doncaster Council. It is also noted that, further management of any movements scheduled within or close to the AM and PM peak hours would be introduced to lessen the impacts of vehicles in these periods, which can be identified through the preparation of the Construction Traffic Management Plan secured by Schedule 2, Requirement 13 of the **Draft DCO [APP-220]**.
City of Doncaster Council has requested further dialogue take place with the applicant following the detailed considerations above having been shared with them, with the applicant has agreed to.	The offer of further dialogue is welcomed and will continue with City of Doncaster Council.
Other Environmental Topics (Chapter 14) Glint and Glare: (with specific reference to Doncaster Sheffield Airport) In City of Doncaster Council's response to the Statutory Consultation, it was highlighted that it was unclear whether the assessment contained within the PEIR assumed Doncaster Sheffield Airport to be closed or operational. It was therefore highlighted at that time that the council's aspirations were for the airport to be operational again in the near future and accordingly requested that all assessments in respect of impacts to the airport should assume the scenario as being fully operational. City of Doncaster Council notes that these assumptions have been taken forward within the ES and that on the basis of a worst-case scenario, Table 6 - 5, the ES states there are no Glare impacts for the receptors at Doncaster Sheffield Airport. City of Doncaster Council is currently seeking to verify this from an airport safeguarding perspective and will make further submissions within the Local Impact Report as necessary.	City of Doncaster Council provided an update to the Applicant shortly before Deadline 1. The current position is set out in the Statement of Common Ground (SoCG) between the Applicant and City of Doncaster Council and is currently under consideration.
Noise and Vibration Policy 54 of the adopted Local Plan sets out that development proposals that are likely to cause pollution, or be exposed to pollution, will only be permitted where it can be demonstrated that pollution can be avoided, or where mitigation measures (such as those incorporated into the design and layout of development) will minimise significantly harmful impacts to acceptable levels that protect health, environmental quality, and amenity. It goes on to set out that consideration will be given to the presence of noise generating uses close to the site, and the potential noise likely to be generated by the proposed development. One of the more significant concerns likely to be predominate for residents of the Borough will focus on noise and vibration impacts, especially during the construction period of the development. In this respect, the following matters are noted: • Construction and decommissioning noise levels will be controlled through implementation of the detailed CEMP and DEMP. • Drilling activity noise effects will be reduced as far as reasonably practicable, including maximising the distance from horizontal directional drilling working areas to sensitive receptors and the use of acoustic fencing, if required. • The distance between sensitive receptors and locations where high vibration generating construction and decommissioning activities will occur is such that construction induced vibration effects are not significant. • Embedded mitigation is to be included for construction and decommissioning. • Appropriate routing of construction and decommissioning traffic on public roads and along access tracks will take place. • A construction noise monitoring scheme shall be developed alongside a communication strategy and noise complaint system.	The Applicant notes these comments and highlights that a detailed Construction Environmental Management Plan and detailed Decommissioning Management Plan would be prepared and agreed with City of Doncaster Council prior to the respective construction and decommissioning stages and are secured by Schedule 2, Requirements 11 and 18 of the **Draft DCO [APP-220]**.

Comments from Relevant Representation	Response to Relevant Representation
• Voluntary consent under Section 61 of the Control of Pollution Act 1974 will be sought prior to noisy work required outside core work hours being carried out to demonstrate that noise and vibration has been minimised as far as reasonably practicable. The provisions set out in the CEMP and DEMP remain under review by City of Doncaster Council at the time of writing, and more detailed consideration will be set out in the Local Impact Report. Consideration is also being given to ensuring that currently uninhabited listed buildings with the potential to come back into use would not be adversely affected in these respects (see also the commentary regarding Chapter 7).	
Cumulative Effects (Chapter 15) Chapter 15 of the ES does not identify any significant effects in combination. City of Doncaster Council reserves its position to make more detailed commentary on this matter within the Local Impact Report. In general, whilst not committed developments at this point for the purposes of the ES, there are two other substantial solar farm DCO projects in the pipeline within the Borough (and into neighbouring authorities), which may have progressed by the time of the Local Impact Report or into the examination and these will be referenced in detail at those stages, where possible to do so in order to give the fullest, and most up to date position to assist the Examining Authority. Similarly, Town and Country Planning applications currently undetermined may have been determined by these stages and will also be referenced accordingly.	The Applicant notes this comment and can confirm that it is frequently monitoring City of Doncaster Council's Planning Public Access and the Planning Inspectorate's National Infrastructure website for Cumulative Developments. The Applicant is aware of Whitestone Solar Farm (https://whitestonesolarfarm.co.uk/) and Tween Bridge Solar Farm (https://tweenbridgesolar.co.uk/). Statutory consultation on Tween Bridge Solar Farm is being undertaken between March and May 2025 and statutory consultation for Whitestone Solar Farm is due to be undertaken during Summer/Autumn 2025. Both projects are located within the Doncaster administrative area but area outside of Fenwick Solar Farm's zone of influence.
Draft Development Consent Order At this stage the Council reserves its position on the relevant parts of the draft DCO including the proposed requirements which are likely to be needed to be amended or added to at the examination progresses.	The Applicant and City of Doncaster Council have undertaken further engagement on **Draft DCO [APP-220]** through March and April 2025, and subsequent amendments reflecting that engagement have been included in the draft DCO at Deadline 1. The SoCG with City of Doncaster Council **[EN010152/APP/8.5]** reflects any remaining areas of discussion.
In all the above respects, where necessary, City of Doncaster Council welcomes the opportunity for ongoing dialogue with the applicant, and further substantive comment will be provided accordingly in the Local Impact Report. City of Doncaster Council looks forward to working with the applicant and the Planning Inspectorate as the project progresses through the DCO process and welcomes the opportunity to comment on matters of detail throughout the examination.	The offer of continued dialogue is welcomed by the Applicant, and has been actioned since the submission of City of Doncaster Council's RR per the log of engagement included within the SoCG with City of Doncaster Council **[EN010152/APP/8.3]**. The Applicant looks forward to continuing this engagement through the examination.

2.2 Parish Councils

Table 2-2 Applicant's Response to Relevant Representations – Parish Councils

Ref No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
RR-002	Moss & District Parish Council	We will object to the development for multiple reasons that can only be outlined here in brief. We will have a lot more comments following registration. 1 Sheer Size 2 Visual impact 3 Solar inefficiency 4 Damage to wildlife 5 Loss of Amenity 6 Loss of productive farmland 7 Safety concerns arising our of battery storage 8 Traffic Impact 9 Negative impact on the local economy	<u>Size of the Scheme</u> The Government has identified through its energy policies, most recently in the NPS EN-1 and the National Policy Statement for Renewable Energy (NPS EN-3), that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed at length in the **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme. The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of a large amount of renewable electricity, whilst addressing the local context and setting within which it is located. In accordance with NPS EN-1 Paragraph 5.11.3 and NPS EN-3 Paragraph 2.10.29 the Applicant considered the use of previously developed land and did not identify any available land within its area of search of an appropriate size to locate the Scheme. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and wide-ranging stakeholder engagement. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable, as set out in the **Consultation Report [APP-022]** and summarised in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]**. As set out in the **Design and Access Statement [APP-191]**, design principles have guided, and will continue to guide, the Scheme from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. Impacts on the local community have therefore been minimised as far as practicable. <u>Landscape and Visual impacts</u> **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** recognises that there will be visual impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme. Whilst some visual impacts will remain at year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting, thus minimising such impacts. Where the potential for adverse visual impacts has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as practicable. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A. A detailed LEMP (which must substantially accord with the Framework Plan) will need to be approved

Ref No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation

prior to construction with the relevant local planning authority and this is secured by Requirement 6 in Schedule 2 to the **Draft DCO [APP-220]**.

Solar Inefficiency

As explained in the **Statement of Need [APP-192]**, solar power generation has global momentum, and various large-scale schemes are being developed in the UK. Solar is a proven technology. It is already delivering as part of the UK's electricity system and will continue to deliver further critical benefits to consumers through the urgent and continued decarbonisation, security of supply and affordability. Solar power generation has undergone significant technological advances in scale and commercial efficiency and solar panel efficiency is expected to continue improving over the course of the 2020s. It is therefore important to make best use of this natural, renewable energy resource to meet the UK's legal carbon emission reduction obligations.

The Scheme would utilise a fixed south facing system. Fixed south facing solar mounting structures are the most common approach for utility scale solar PV facilities in the UK to date and involve installing solar PV panels to fixed tables, arranged in rows facing south. The Scheme design retains flexibility to allow for the selection of the most efficient technology. Solar generation technology is developing at a fast pace, with better, more efficient and more cost-effective solar PV panels coming to the market. The Applicant is therefore seeking to retain the flexibility to choose the precise technology close to the point of the construction of the Scheme. This will enable the optimum production of renewable energy and subsequently reduce cost for the end user. The final technology installed will be required to remain within the parameters defined by the **Works Plan [APP-214]** and **Outline Design Parameters Statement [APP-193].** There is an opportunity for the examination Authority to raise questions regarding the Scheme design during Examination.

Damage to Wildlife

Volume I, Chapter 8: Ecology [APP-060] provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. Pre-construction surveys will be undertaken to support the baseline survey findings. The purpose of these pre-construction surveys is to ensure mitigation during the construction phase is based on the latest protected species information. These surveys will also provide an update on the presence and location of any invasive non-native species (INNS), the findings of which will inform the implementation of measures to prevent their spread into the wild. These measures are incorporated within the **Framework CEMP [APP-196]** which is secured by Requirement 15 of Schedule 2 to the **Draft DCO [APP-220]**).

Volume I, Chapter 8: Ecology [APP-060] concludes that the Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**.

As detailed in the **BNG Assessment [APP-200]** and based on the current plans, the Scheme is predicted to result in a net gain of 36.46% for area-based habitat units, a net gain of 62.75% for hedgerow units, and a net gain of 24.97% for watercourse units. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types in the **Framework**

Ref No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
			LEMP [APP-202]. This commitment is secured via Requirement 6 in Schedule 2 in the **Draft DCO [APP-220]**, which requires the approval by the relevant planning authority of a detailed LEMP that is substantially in accordance with the **Framework LEMP [APP-202]**, and Requirement 7 in Schedule 2 in the **Draft DCO [APP-200]** which requires the approval by the relevant planning authority (in consultation with the relevant statutory nature conservation body) of a biodiversity net gain strategy which must also be substantially in accordance with the **Framework LEMP [APP-202]**. Loss of Amenity Visual Amenity impacts are considered under the 'Landscape and Visual Impact' section of this response above. An assessment of noise impacts from equipment, such as transformers and inverters, on residential receptors is presented in **Volume I, Chapter 11: Noise and Vibration [APP-063]**. With proposed mitigation measures in place, noise from equipment is not considered to be significant and is likely to be less than ambient noise levels. Working hours are set out in the **Framework CEMP [APP-196]** with the use of high noise generating plant limited to the hours between 08:00 and 18:00 from Monday to Friday and between 08:00 and 13:00 on Saturday. There will be no works undertaken on Sundays or Bank Holidays unless crucial to construction (for example Horizontal Directional Drilling, which must be a continuous activity) or in an emergency. The BESS Area and On-Site Substation will emit some noise when operating and these have therefore been carefully located with respect to residential receptors. Operational noise impacts are assessed in **Volume I, Chapter 11: Noise and Vibration [APP-063]** which concludes that operational impacts will be negligible at all residential receptors. Impacts on air quality arising from the scheme are presented in **Volume I, Chapter 14: Other Environmental Topics [APP-066]**. With proposed mitigation measures in place, there would be no significant impacts as a result of constructing and decommissioning the Scheme. Impacts of the Scheme during operation and maintenance will be very minor owing to the small number of traffic movements and the limited use of the emergency generator at the On-Site Substation. Amenity related impacts will be managed to acceptable levels through the suite of construction, operation and decommissioning management plans proposed and secured via Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Group will be also set up, as is secured by Requirement 3 in Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Officer (or alternative role) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the impacts of the Scheme. This process will allow feedback on impacts of the Scheme and mitigation measures to be considered and acted upon if required. Loss of Productive Farmland In identifying areas that could be suitable for a Solar PV Site, the Applicant considered locations that would avoid BMV agricultural land. To identify these locations the Applicant used provisional Agricultural Land Classification mapping published by Natural England. The results of this exercise are set out in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]**. As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-064]**, an agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV

Ref No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation

land. With the exception of a relatively small area of BMV land (0.78 ha) proposed for structural planting, impacts on this BMV land will be temporary, reversible and the land will be returned to its existing use. In addition, due to the small scale of this BMV land, it is not currently farmed for high-quality agricultural food production and was recently used for biomass crops.

Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction, operation and maintenance, and decommissioning phases. However, there is potential for grazing by sheep for management of the grassland during operation and maintenance. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**.

Prior to the start of construction, a detailed SMP will be submitted to and approved by the local planning authority (as outlined in the **Framework CEMP [APP-196]**, a process which is secured by Requirement 15 of Schedule 2 to the **Draft DCO [APP-220]**). This will ensure soils are not degraded and farming activities can re-commence following completion of the construction phase along the Grid Connection Corridor and decommissioning phase within the Solar PV Site. The **Framework DEMP [APP-198]** includes measures that will ensure the restoration of agricultural land and soils to its existing use, following decommissioning. This is secured through Requirement 18 of Schedule 3 to the **Draft DCO [APP-220]**).

Safety Concerns Regarding Battery Storage

The operation of the BESS Area will be subject to the Battery Safety Management Plan (BSMP). A **Framework BSMP [APP-205]** is included in the Application and outlines the safety and property protection fire safety risks associated with BESS Area and demonstrates that the location of the BESS Area does not give rise to a significant increase in fire risk and that any risk that does exist can be addressed by ensuring that the Scheme is constructed, operated and maintained, and decommissioned in accordance with the **Framework BSMP [APP-205]**. Requirement 5 of Schedule 2 of the **Draft DCO [APP-220]** requires the submission and approval of a detailed BSMP, which must be substantially in accordance with the **Framework BSMP [APP-205]**. This will be in consultation with South Yorkshire Fire and Rescue Service (SYFRS) to ensure compliance with relevant standards.

Traffic Impact

A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within **Volume I, Chapter 13: Transport and Access [APP-065]**. Traffic during the operation and maintenance phase would be minimal.

The assessment of effects in **Volume I, Chapter 13: Transport and Access [APP-065]**. concludes that during construction, following the implementation of mitigation measures, potentially significant adverse effects at road links 9 (Moss Road – Askern Village), 10 (Moss Road – East of Askern), 11 (Fenwick Common Lane), 12 (Trumfleet Lane – South of Moss), 13 (Marsh Road) and 14 (Thorpe Bank) remain. These all relate to increases in traffic and some also with regard to severance and driver delay and effects on Non-Motorised Users (NMU). However, the routes currently experience low baseline traffic numbers (as summarised in Table 13-13 of **Volume I, Chapter 13: Transport and Access [APP-065]**) which is the reason for the higher percentage increase in traffic and, therefore, the overall impact is not deemed significant with regard to increase in traffic. In addition, effects are temporary in nature and not due to a lack of capacity on the road network. During operation

Ref No.	IP Name	Comments from Relevant Representations	Response to Relevant Representation
			and maintenance, traffic generation will be negligible. The **Transport Assessment [APP-179]** and **Framework CTMP [APP-206, APP-207]** provide full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes measures such as the use of traffic marshals at site accesses and crossing points, the development of a communications strategy for those working on the Scheme and the use of agreed Heavy Good Vehicle (HGV) routes and timing restrictions (including the use of Fenwick Common Lane for inbound construction staff only and not HGV). Pre and post-construction surveys of roads and PRoW would also be undertaken at identified locations in coordination with the relevant Local Highway Authority and any surfaces reinstated. A detailed CTMP (which must substantially accord with the **Framework CTMP [APP-206, APP-207]**) will need to be approved prior to construction with the relevant local authority, a process which is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**. Negative Impact on the Local Economy As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226],** Gross Value Added (GVA) in the Yorkshire and the Humber is estimated to be £63,314 per construction worker. By applying this figure to the gross direct construction workers generated by the Scheme, it is estimated that construction would contribute approximately £12.6 million to the national economy, of which £5.7 million would be within a 60-minute drive time from the Order limits. Construction activities associated with the Scheme will provide access to employment in this phase, which will provide a beneficial health impact to these workers. Similar economic benefits are also anticipated for the decommissioning phase. The Application includes a **Framework Skills, Supply Chain and Employment Plan (SSCEP) [APP-204]** which identifies potential opportunities for activities relating to skills, supply chain and employment that the Applicant will take forward post-consent. A detailed Skills, Supply Chain and Employment Plan is secured by Requirement 16 of the **Draft DCO [APP-220]** and requires the Plan to be substantially in accordance with the **Framework SSCEP [APP-204]**.

2.3 Non-Statutory Organisations

Table 2-3 Applicant's Response to Relevant Representations – The Burnet Heritage Trust

Comments from Relevant Representations	Response to Relevant Representation
The Burnet Heritage Trust was established in 1999 to protect the wildlife of the Humberhead Levels, notably the wildlife of the clay farmlands located to the north of Doncaster. The Trust manages approximately 47ha of land, mainly located along the valley of the River Went in the northern part of the clay lands. All this land is farmed, and careful management has allowed the ecological improvement of hedges and pastures and, on riverside sites, the protection of wetlands. Much of the land is registered under the Higher-Level Stewardship Scheme (HLS) operated by Defra, and a submission for SSSI status is underway. One of the trust's meadows, Fleet Ings, lies on the opposite bank of the River Went to the proposed solar farm, and other trust sites are nearby, forming a riparian habitat corridor. Trustees have concerns about the proposed development and its potential impacts on the site, surrounding habitats, wildlife, and recreation. These include the uniqueness and biodiversity of the area, the preliminary nature of the PEIR, habitat loss for ground-nesting birds, disturbance to habitat, the scale and cumulative impact of the project, reduced amenity value, and the inadequate level of mitigation. The trust's concerns have been detailed within the attached documents 'Fenwick Solar Farm: Potential risks and opportunities Consultation response documentation from The Burnet Heritage Trust' and we trust that officers will acknowledge these. Trustees' comments are based on many years of professional experience. Committee members include an ecological research scientist with a publication record at the highest level, an ecological consultant & plant ecologist, a countryside access management and public rights of way officer, and a local authority growth manager. Retired trustees and significant contributors to the charity's work include a farmer and botanical expert, a land agent, and retired chairman, the late Roger Mitchell MBE, a dedicated conservationist, and civil engineer, instrumental in the creation of Potteric Carr, North Cave Wetlands and Old Moor nature reserves. All with many years in their respective fields. Representatives from BOOM have been communicative and have sought to answer our queries, however, they have been unable to adequately allay our concerns and upon receipt of our consultation response have not incorporated or, we feel, considered our recommended amendments. We have registered as an interested party, so that we may continue to contribute to the planning process and work towards more favourable outcomes for the wildlife and valued habitats along the River Went.	**Volume I, Chapter 8: Ecology [APP-060]** provides a detailed assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which identifies the habitats and species present and considers if they are likely to be affected by the Scheme. The Environmental Statement (ES) builds on the preliminary work presented in the Preliminary Environmental Information Report (PEIR). The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by detailed ecological surveys and a design team with qualified professional ecologists. This includes avoidance and retention of habitats of greater value for biodiversity, such as hedgerows and woodlands, buffers to protect existing features, and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. In addition, the Scheme will create and enhance a wide range of habitats, such as grasslands, hedgerows and trees, that will benefit wildlife present in the area. Details of habitat creation and enhancements are set out in the **Framework LEMP [APP-203]**. Detailed responses regarding specific subjects, such as potential Site of Special Scientific Interest (SSSI) designation and individual species, are dealt with in the responses below.
The trust is concerned that the PEIR reports do not consider the special characteristic, high biodiversity value or uniqueness of surrounding areas, particularly those located to the north-east of the project site in the Topham area.	**Volume I, Chapter 8: Ecology [APP-060]** provides a detailed assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which identifies the habitats and species present and considers if they are likely to be affected by the Scheme. The ES builds on the preliminary work presented in the PEIR. This assessment includes consideration of adjoining important wildlife sites, such as the Went Valley Local Wildlife Site (LWS) and priority and notable habitats and species, including those in the Topham area (where located within a potential Zone of Influence (ZoI) of the Scheme).
This area is currently in the submission process to be designated as a SSSI by Natural England. The Burnet sites (inclusive of the northeast portion of the BOOM site), meet the scoring threshold for SSSI based on bird communities for both lowland wet grassland and	The Applicant notes that the Burnet Heritage Trust's sites have been put forward as a proposed SSSI. However, through consultation with Natural England it has not been possible to locate further details on the submission, including the boundary of the area to be designated and the habitats and species

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lowland fen. Additional to 23.23ha managed by the BHT specifically for biodiversity and public amenity, a further 28ha (approx.) are managed for wildlife by sympathetic landowners with BHT consulting on management practices. Whilst a slow bureaucratic process prevents rapid designation as SSSI, there are sufficient records in the public domain to demonstrate that the area self-evidently meets these criteria (see https://data.jncc.gov.uk/data/16bd76ad-bb74-4724-9e06-5df02b459524/sssi-guidelines-c17-birds-2023-v1-2.pdf). As such, a responsible environmental governance strategy would be to regard these areas as if they were, in effect, designated SSSI.	assemblages to form the citation. As such, a specific assessment of this potential designated site has not been undertaken. However, the assessment presented in **Volume I, Chapter 8: Ecology [APP-060]** does consider the impacts on all relevant habitats and species which are likely to comprise the proposed SSSI and, while no assessment of the proposed SSSI itself is presented, the impacts to the relevant component features are assessed (where located within a potential ZoI of the Scheme).
The unique eco-cultural value of the Fishlake and Sykehouse landscapes is increasingly being recognised, particularly for the high numbers of healthy veteran White Willow trees remaining in the area. The areas "landscape holds a remarkable collection of ancient pollard, coppice, and standard white willows." (Rotherham, 2021 – see Appendix I). This landscape of veteran Willow Trees extends across the proposed development site and these trees are prominent around Fenwick Hall and Fenwick village. Without active management (pollarding) of these trees within the site boundary they will likely not continue to survive. As long ago as 1988 the Sykehouse area was recognised for its uniquely high biodiversity (Rhodes, 1988) – particularly its breeding Curlew population. Seasonally inundated marsh and wet grassland along the River Went (much of which is now included within the proposed development area) are specifically identified for their value.	**Volume I, Chapter 8: Ecology [APP-060]** considers the impacts to breeding birds, such as Curlew, as well as wetland habitats along the River Went. Developable areas are set back from the riparian habitats and wetlands along the River Went to avoid adverse impacts. The **Framework LEMP [APP-203]** includes details of enhancement measures and management prescriptions for the River Went corridor within the Order limits. The **Framework LEMP [APP-203]** includes details of the management of veteran trees, including white willows, in the 'Tree Works' section. The Scheme has been designed to ensure that all veteran and ancient trees are retained and protected during both construction, operation and decommissioning. As stated in Paragraph 5.2.6, veteran and ancient trees on the Solar PV Site are to be managed as per principles of minimum intervention (this is based upon the individual tree condition evaluated by the tree survey). This includes affording the veteran and ancient trees sufficient space to facilitate the continuation of decay and regeneration lifecycle processes. The principal issue identified during the tree survey is encroaching scrub and tree growth competing with the ancient and veteran trees, which may cause their premature loss or deterioration (e.g. due to shade suppression). Where this has been identified, it will be carefully undertaken in a multi-year staged work programme to avoid sudden changes in exposure. The potential to take cuttings from existing veteran willow to propagate and allow for succession planning will be explored. Retained trees will require periodic inspection to assess their structural condition and safety, and the future condition of trees and the potential requirement for remedial works will be evaluated as part of the management of the Scheme.
In 2015 the BHT submitted the 'Settled Clay Farmlands Project Report 2015' to Doncaster Metropolitan Borough Council (DMBC) examining how to advance and improve the environmental quality of one of the best remaining natural areas in the Doncaster region (see Appendix 2). Historical and proposed designation of land in the immediate vicinity, along with the developing Local Nature Recovery Strategy, echo the message within the Clay Farmlands Report; that the Sykehouse, Fishlake and Fenwick are among the best natural areas regionally. Although apparently omitted from the data search for this application (despite the boundary of the application area running along the border between North Yorkshire and Doncaster) the Trust is aware of several 'deleted' Sites of Importance for Nature Conservation (SINC) within the study area referred to in the PEIR including Fleet Ings, a site which has subsequently been brought into conservation management by the Trust. Data held by the Trust suggest that this and the adjacent Topham Ferry Ings site would now meet the selection criteria for designation as SINC for grassland (Gr2) and/or Standing Water habitats (SW1) https://static1.squarespace.com/static/5c1bc13f1aef1d17f2594774/ t/5dad81ed218aa17443c8c9c1/1571652081533/SINC+Guidelines+V3.0++December+2017.pdf. Populations of regionally scarce wetland plant have been recorded on these sites including: Small Water-pepper Persicaria minor (Categorised as Vulnerable in the Great Britain Red List (revised Feb 2021) https://hub.jncc.gov.uk/assets/cc1e96f8-b105-4dd0-bd87-4a4f60449907	The Applicant recognises that Settled Clay Farmlands Project Report 2015 highlights the areas of Sykehouse, Fishlake, and Fenwick as valuable natural assets and confirms that the design of the Scheme has been developed with careful consideration of local environmental characteristics and measures incorporated to support biodiversity and landscape integration. The noted 'deleted' Sites of Importance for Nature Conservation (SINC) are assumed to be outside the Order Limits and whilst are not considered specifically in **Volume I, Chapter 8: Ecology [APP-060]** (due to their de-notification), where for example, important ecological features which may be component features of these past sites (e.g. non-breeding waterbirds using wetland areas north of the River Went), these are assessed individually (where located within a potential ZoI of the Scheme). The **Framework LEMP [APP-203]** includes details of enhancement measures and management prescriptions for all habitats within the Order limits. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by detailed ecological surveys and a design team with qualified professional ecologists. This includes avoidance and retention of habitats of greater value for biodiversity, such as hedgerows and woodlands, buffers to protect existing features, and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**.

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(revised Feb 2021 https://bsbi.org/taxon-lists), Needle Spike-rush Eleocharis acicularis (Categorised as Near Threatened in the England Red List (2014) https://bsbi.org/wp-pcontent/uploads/dlm_uploads/England_Red_List_1.pdf and Water violet (Categorised as Vulnerable in the England Red List (2014) Great Britain Red List (revised Feb 2021) https://hub.jncc.gov.uk/assets/cc1e96f8-b105-4dd0-bd87-4a4f60449907 (revised Feb 2021 https://bsbi.org/taxon-lists). The two sites in question have been included within the programme for re-survey by the North and East Yorks Ecological Data Centre on behalf of the North Yorkshire SINC Selection Panel. Priorities for nature recovery in South Yorkshire are currently being identified by the Local Nature Recovery Strategy Advisory Panel (of which, one of the Trustees is a member). Restoration of river habitats and reconnecting them to their floodplains to enable species to migrate in response to climate change from sea level to the Pennines is likely to feature highly within the developing Recovery Strategy. The River Went corridor borders the northern edge of the Application and already features strongly in the natural capital and biodiversity mapping work undertaken (Map 50 https://www.southyorkshire-ca.gov.uk/getmedia/f1530d63-8657-4650-90a0-43c8c04ccfa5/South-Yorkshire-natural-capital-and-biodiversity-mapping.pdf). The development proposals need to consider the constraints that such a large-scale solar farm would have on future improvements in the connectivity of riparian and floodplain habitats.	These measures will allow the Scheme to support and contribute to emerging Local Nature Recovery Strategies.
The Trust is somewhat concerned about the highly preliminary nature of the PEIR report in itself – the report refers in multiple cases to the need for additional surveys in 2024 - or an incomplete set of surveys, having being carried out. We are concerned that, as it stands, the ecological assessment is not sufficiently complete for us to be able to comment on in a fully informed manner. Therefore, we would be grateful if BOOM could clarify what additional opportunities there will be, to give our views on the detailed findings, and when field surveys are anticipated to be complete and available. Specific concerns regarding informational gaps in the PEIR report are detailed below. A further concern the trust wished to flag is that the PEIR reports, and additional materials run to several thousand pages. As such, we do not feel that as a small group of volunteers we have been able to fully digest and understand all the technical materials within the available timeframe for statutory consultation. Additionally, we feel that important information (and notable omissions) can be hidden within reams of generic statements which have no significant bearing upon the scheme. As such, this document seeks to highlight our main concerns, but we cannot be fully confident that we have not omitted serious ecological, or amenity issues lost in the mass of documentation.	The Applicant refers the Burnet Heritage Trust to **Volume I, Chapter 8: Ecology [APP-060]** which has been further developed since the PEIR and provides a detailed assessment of the potential impacts of the Scheme on ecology and nature conservation. **Volume III, Appendix 8-1** to **Volume III, Appendix 8-9 [APP-145** to **APP-155]** support the ES chapter and provide full details of the ecological baseline conditions recorded during the surveys. The Burnet Heritage Trust has the opportunity to continue to engage with the Applicant and provide comment on the Scheme during and after the DCO Examination. As stated in Table 3-3 of the **Framework CEMP [APP-196]**, pre-construction site walkovers will be undertaken in advance of mobilisation/any potential advance works to re-confirm the ecological baseline conditions and to identify any new ecological risks. The Applicant will produce a detailed CEMP post consent, during the detailed design stage, that will be in accordance with the **Framework CEMP [APP-196]**, as secured by Requirement 11 of Schedule 2 in the **Draft DCO [APP-220]**. In addition, the **Framework LEMP [APP-203]** includes details of enhancement measures and management prescriptions for all habitats within the Order limits.
One of what appears to now be one of four remaining pairs of Curlew in South Yorkshire is again displaying over the proposed Solar Farm site (April / May 2024) - a species which according to Birdlife International 'almost certainly qualifies as threatened [with global extinction] under threat criteria under criteria A2bcd+3bcd+4bcd' (Birdlife, 2024). The only allusion to the nesting of Eurasian Curlew on the site we were able to find in the BOOM materials is as follows: "Curlew was recorded on the Solar PV Site in April 2023, but no subsequent evidence of breeding on the Site was identified. The species is likely to be present within the wider landscape of the Site. However, the bird field survey documentation makes no listing of the overall site effort carried out up to this point and there is no clear evidence that sufficient walkover surveys to detect Curlew were carried out subsequently in 2023.	As stated in **Volume III, Appendix 8-7 Breeding Bird Report [APP-152]**, a single Curlew was recorded within the Order limits in April 2023, however, no further observations were made during surveys between May and July 2023. This suggests either that individual had established a breeding territory early on in the breeding season and either failed to attract at mate or was possibly breeding within the wider landscape. No indication of a breeding attempt was noted on subsequent visits. Irrespective of this the provision of extensive areas of undeveloped land consisting of neutral grassland specifically managed for ground-nesting birds and management of riparian grasslands and creation of scrapes along the River Went corridor will provide a consistent nesting resource preserving Curlew nesting habitat within the Order limits for the design life of the Scheme, something that is currently absent as evidenced by the change in land use from grassland to arable. **Volume I, Chapter 8: Ecology [APP-060]** provides a detailed assessment of the ecological baseline of the Order limits, as at the point of survey. However, the assessments do draw upon existing datasets of recent ecological data, to provide context to the findings of specific surveys undertaken for the

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It is worth also noting, that this species bred successfully in 2022, prior to the conversion of a significant proportion of the north-east of the site from low-intensity grassland to arable agriculture for the first time in over 25 years. This action by the farmer was apparently co-incidental with the lease approach for the site by BOOM, but should be, in the view of the trust considered a disruption of the true ecological baseline state of the site, prior to the influence of the proposed NSIP. TN28 suggests that a similar process has taken place on land at the Southern extremity of the site adjacent to Moss village, since of the caption reads "Desk study revealed that this area is CFGM, however this is not the case -this is Arable land now".	application. The Applicant currently has no control or influence over how landowners choose to manage their land in any given year. However, should the DCO be granted, the management of the Order limits will strictly follow the prescriptions set out in the **Framework LEMP [APP-203].**
Eurasian Hobby - A pair has bred successfully inside the boundary of the PV site in several years 2014-2019 at least (chicks ringed and registered with BTO in two of these years). This was not identified in any PIER documentation. The more recent success of these birds is unknown, but summer records over BHT land to the East suggest they are still breeding in the immediate area, perhaps in the vicinity of the site. Breeding Hobby are highly affected by disturbance (REF). During the breeding season, the primary food source comprises Ondonata insects (Chapman et al., 2011), which like other aquatic invertebrates are potentially highly affected by polarized light from PV units. Hobby is listed on Schedule 1 of the The Wildlife and Countryside Act. Thorne and Hatfield Moors constitute the largest spring gathering of Hobby in Northern England, the potential for a 540ha PV scheme (roughly half the size of Hatfield Moors) to affect insect populations of a site 5 miles away seems relatively low but is essentially unknown.	Whilst the Applicant did not record Hobby nesting within the Order limits, it is acknowledged that active nesting of the species can be particularly difficult to detect, due to the secretive nature of birds at nest sites. Irrespective of this, all potential nesting locations (e.g. mature trees) will be retained as part of the Scheme. Prior to any construction commencing, appropriate surveys will be undertaken to determine the current status of all important ecological features and, where necessary, identify appropriate measures to be put in place to comply with all relevant wildlife legislation (e.g. disturbance of species listed on Schedule 1 of the Wildlife and Countryside Act). These measures are outlined in the **Framework CEMP [APP-196]**. A detailed response on potential impacts to aquatic invertebrates is set out in the rows below, however, the risk of attraction for significant numbers of *Odonata* (i.e. to have an effect on the population levels and therefore the availability as a prey resource for Hobby) is considered negligible. During operation and maintenance of the Scheme, there will be limited personnel present and activities undertaken within the Order limits which may cause disturbance to breeding Hobby. These are likely to be similar or lower than existing farming activities. As noted, Thorne and Hatfield Moors are a significant distance from the Order limits, with extensive areas of mature vegetation and other structures in the intervening area. It is therefore reasonable to assume that areas of Solar PV Panels will not be visible to *Odonata* populations associated with these sites and that significant numbers of individuals would not be affected by the presence of Solar PV Panels.
Marsh Harrier - This species regularly feeds in along the River Went, including over the northern section of the proposed site and is common at both Topham on the northern boundary, and North Common (3 miles West of site footprint). Whilst this is primarily juvenile birds in the post-breeding season, adults are also regularly seen in the winter and the potential for breeding in the wider area in future is high.	The Applicant recorded foraging Marsh Harrier during non-breeding bird surveys, as presented in **Volume III, Appendix 8-8: Non-Breeding Bird Report [APP-154].** The creation of extensive areas of neutral grassland across the Order limits, as well as the enhancement of the riparian corridor along the River Went, will likely benefit foraging Marsh Harrier (i.e. greater abundance of prey) and not prohibit potential future breeding in the wider area.
Barn Owl - At least two pairs nested in the areas immediately adjacent to the proposed site at Topham and Flashley Carr Lane. The nest site of the Topham pair is 100m from the proposed site boundary.	Whilst the Applicant did not record Barn Owl nesting within the Order limits, the species was recorded during surveys and, as such, it is acknowledged that the species is likely to be breeding in the wider landscape. Irrespective of this, all potential nesting locations (e.g. mature trees/buildings) will be retained as part of the Scheme. Prior to any construction commencing, appropriate surveys will be undertaken to determine the current status of all important ecological features, including within a wider ZoI and, where necessary, identify appropriate measures to be put in place to comply with all relevant wildlife legislation (e.g. disturbance of species listed on Schedule 1 of the Wildlife and Countryside Act). These measures are outlined in the **Framework CEMP [APP-196]**.
Grey Partridge- This species has been regularly heard singing from the northern extremity of the proposed development area. There are very likely other pairs of this now scarce farmland bird species elsewhere on the site. Norton Common (3 miles to the West) is a stronghold for the species within South Yorkshire. The species is listed on the UK red list.	An assessment of the potential impacts of the Scheme on Grey Partridge and other ground-nesting birds is presented in **Volume I Chapter 8: Ecology [APP-060]**. This concludes that whilst there will be a loss of arable farmland currently supporting Grey Partridge, the retention of existing field margins, provision of wide margins along access tracks, and creation of extensive areas of undeveloped neutral grassland will maximise both nesting opportunities and foraging for chicks and adults alike and there will be no significant adverse effect on the species population.

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Grasshopper Warbler - A bird held territory well into late summer on the Fleet Ings (as good an indication of confirmed breeding as is reasonably possible for this species) in both 2022 and 2023. This territory lies less than 50 m from the edge of the proposed site boundary. Locustella and Acrocephalus warblers rely almost exclusively on song for territorial defense and attracting mates, meaning species in the genus are probably as susceptible to noise pollution as it is possible for a species to be. Grasshopper Warbler is listed on the UK conservation Red List.	In the northeast corner of the Order limits and the along the River Went corridor, areas of Solar PV Panels will be set back by between at least 50 m to 100 m from boundary. Existing hedgerows will also provide screening/barriers to minimise visual and noise disturbance to breeding birds occurring outside the Order limits. It should be noted that measures to minimise disturbance from noise as a result of the construction phase of the Scheme are detailed in **Volume I, Chapter 11: Noise and Vibration [APP-063]** and secured in the **Framework CEMP [APP-196]** which includes a requirement for best practicable means to be applied, as far as reasonably practicable. The erection of the Solar PV Mounting Structures will typically consist of driving the mounts directly into the ground using a small, tracked post driver (see Plate 2-11 of **Volume I, Chapter 2: The Scheme [APP-054]**), followed by Solar PV Panels being attached by hand. Grid Connection Cables and On-Site Cables would largely require a trench to be dug and refilled once the cables are inserted. The exception of this is where horizontal direction drilling (HDD) is required, however, this will not be in needed in the north and northeastern areas of the Order limits. In addition, no construction compounds, Field Stations or construction accesses are located in these areas so disturbance from construction activities will be limited to that arising from erection of the Solar PV Panels. Typical construction working hours during the week are from 07:00 to 19:00 (shortened if working would necessitate artificial lighting) and the location of construction activities will change throughout the construction phase to focus on different areas within the Order limits. Therefore, noise produced by construction activities is expected to be limited and no single area within or surrounding the Order limits will experience prolonged noise impacts. The noise modelling for receptors in Topham, as detailed in **Volume I, Chapter 11: Noise and Vibration [APP-063]**, indicates that, under worst-case construction noise scenarios, average noise levels could exceed baseline levels by 5 dBA to 10 dBA. These predictions assume all construction equipment is operating simultaneously, likely overestimating actual noise levels. In reality, work related to driving the Solar PV Panels will be spread over several days or up to a week in each field. Consequently, any construction noise that might mask or disturb species' vocalizations would occur within a very limited timeframe, if it coincides with the seasonal presence of a particular species at all. Furthermore, typical construction hours are from 07:00 to 19:00 on weekdays (with shorter hours if artificial lighting is needed). For species like the Grasshopper Warbler, whose peak territorial activity occurs at dawn, dusk, and during the night, there will be minimal to no overlap with construction hours. The potential for any noise disturbance to occur will be limited to where construction works are undertaken at the edge of the Order limits, with any works carried out towards the centre of the Scheme having no disturbance potential outside the Order limits. The nature of the vehicles would be similar to existing farming operations and machinery (e.g. diesel generator), plus the distance from known Grasshopper Warbler territories, and duration of activities at any single point, mean that no significant disturbance will occur to sensitive species outside the Order limits. As set out in the **Framework CEMP [APP-196]**, surveys will be undertaken prior to any construction works commencing to reaffirm the baseline conditions. This includes surveys for ornithological features that may be particularly susceptible to disturbance. Should specific mitigation measures be required (e.g. standoff distances, avoidance of certain activities in certain periods, etc.), these will be incorporated into the construction programme and compliance overseen by the appointed Ecological Clerk of Works (ECoW).
Marsh Warbler - A pair held territory for a minimum of 26 days at Topham, a distance of less than 200m from the proposed site boundary. Confirming breeding of this species is exceedingly difficult, but a female was sighted on at least one occasion, meaning a breeding was likely attempted. The singing male was widely seen and confirmed by many local ornithologists, but	As described for Grasshopper Warbler, due to a combination of distance, construction activities and equipment and duration of activities, no significant disturbance will occur to sensitive species, such as Marsh Warbler, outside the Order limits.

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data is only available on request from data repositories due to the exceptional rarity and threats of human disturbance and egg theft. Acrocephalus warblers rely almost exclusively on song for territorial defense and attracting mates, meaning species in the genus are probably as susceptible to noise pollution as it is possible for a species to be. This species is on the UK Red List and the estimated UK population is only 8 pairs (BTO, 2023).	As set out in the **Framework CEMP [APP-196]**, surveys will be undertaken prior to any construction works commencing to reaffirm the baseline conditions. This includes surveys for ornithological features that may be particularly susceptible to disturbance and particularly those included on Schedule 1 of the Wildlife and Countryside Act, where legal compliance is required. Should specific mitigation measures be required (e.g. standoff distances, avoidance of certain activities in certain periods, etc.), these will be incorporated into the construction programme and compliance overseen by the appointed ECoW.
Garganey - This species is difficult to detect as a breeding bird, but a pair with recently fledged young seen and photographed on Topham East Ings suggests breeding as little as 300m from the proposed site boundary in 2023. This species is on the UK Amber List and has an estimate population of 105 pairs (BTO, 2023)	There is no breeding habitat for Garganey within the Order limits and due to a combination of distance, construction activities and equipment and duration of activities, no significant disturbance will occur to sensitive species, such as Garganey, outside the Order limits.
Long-Eared Owl - This species regularly wintered in the Topham area 2000-2006 (with breeding attempted in 2001) and in subsequent years at Plaice Hills (2017) and Norton Common (2020-2024), suggesting a small regular wintering population which moves within the Went valley. Almost entirely nocturnal in its habits it is a very difficult bird to census (BTO, 2023). The total UK population is estimated at around 1800 pairs.	The Applicant accepts that this species can be difficult to detect, however, as presented in **Volume I, Chapter 8: Ecology [APP-060]**, retention of hedgerows, woodlands and field margins will ensure that no loss of potential breeding or wintering roosting habitat to species such as Long-eared Owl will occur, particularly as there is no development proposed within the River Went corridor. Equally, any potential for disturbance during construction will be minimised along the River Went corridor as developable areas are set back from the existing riparian corridor. Any construction disturbance would then be very limited in terms of spatial extent and duration. Habitat creation and enhancement measures set out in the **Framework LEMP [APP-203]** will also improve both nesting and foraging opportunities for Long-eared Owl.
Short-Eared Owl - Regularly winters 3 miles west of the site at Norton Common, with a maximum of 4 birds in 2022-23. The species may also winter on western parts of the proposed site, where historic monitoring is low.	The Applicant did not record Short-eared Owl during non-breeding bird surveys, as presented in **Volume III Appendix 8-8: Non-Breeding Bird Report [APP-154]**. However, the creation of extensive areas of neutral grassland across the Order limits, as well as the enhancement of the riparian corridor along the River Went, will likely benefit foraging Short-eared Owl (i.e. greater abundance of prey).
Reed Bunting - 5 – 10 pairs breed annually in the BHT land (at least 4 within 250m of the site boundary and 1 within 20m). The species also very likely breeds within the planned development site footprint. The species is explicitly identified in the scientific literature as having reduced breeding success as a result of anthropogenic noise (Gross et al., 2010) This species is Amber listed.	Breeding territories of Reed Bunting were identified within the Order limits as detailed in **Volume III, Appendix 8-7 Breeding Bird Report [APP-152]**. As set out for the species above, whilst it is accepted that there will be some disturbance to breeding birds within the Order limits from construction activities, this will be temporary, and any given area will not be subjected to consistent, prolonged disturbance. As such, it is not predicted that noise generated from construction activities will have the same longer-term effect on breeding success that may arise from elevated anthropogenic noise sources, such as consistent traffic noise generated from road networks.
Wildfowl population - The northern boundary of the site holds important populations of breeding and wintering wildfowl. Confirmed breeding species include Shoveler, Garganey, Gadwall (3 pairs), Teal (2 pairs) Tufted Duck (4 pairs) as well as Little and Great Crested Grebe. The most favoured area for wintering duck lies immediately north of and adjacent to the proposed site, making the potential for disturbance of wintering birds from construction works very high. Maximum wintering totals at this location include 65 Eurasian Wigeon, 230 Mallard, 200 Eurasian Teal, 52 Gadwall, 30 Tufted Duck, 95 Common Snipe and 2 Pintail. Existing mitigation plans will likely result in destruction of suitable wildfowl habitat by planting broadleaf woodland immediately opposite on the South side of the river and thereby removing sufficient sightlines to allow waterfowl to comfortably congregate. This should not take place in the immediate Went floodplain except in very limited areas (see – Fig. 5).	An assessment of non-breeding waterbirds is presented in **Volume I, Chapter 8: Ecology [APP-060]** which concludes that there will be no significant effects to waterbirds associated with wetlands along the River Went corridor. There will be some planting of hedgerows and trees along the existing field boundaries south of the River Went to re-enforce existing boundary vegetation but there will be no woodland planting.

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Other visiting species - The site immediately north of the proposed site boundary is also highly attractive to passages species including Spoonbill, Great Egret, Little Egret, Little Ringed Plover, Shelduck, Redshank, Oystercatcher, Whimbrel, Dunlin, Curlew Sandpiper, Green Sandpiper, Common Sandpiper and Wood Sandpiper	As set out above, an assessment of non-breeding waterbirds is presented in **Volume I, Chapter 8: Ecology [APP-060]** which concludes that there will be no significant effects to waterbirds associated with wetlands along the River Went corridor.
It is somewhat concerning that elements of the desk-based survey which could have been completed in advance of the PEIR publication have not been included. The desk-based survey related to birds, states "There are over 1,000 recent records of notable bird species within the Study Area" but makes no reference to the datasets utilised. Nor does it appear that any desk-based appraisal of the immediately surrounding areas has been undertaken. In particular it is notable that a great deal of data is freely and publicly available for the Topham area, on the platform eBird, and that a constant effort bird-banding site has been run for many years at Moss Brickworks LWS (that data from which would be available upon request from the BTO). Moreover, the omission of tens of significant records related to those areas, particularly from the 'Topham Ferry Flashes' eBird which overlaps with the BOOM site, suggests that these data sources have not even been consulted.	The Applicant notes that there is a wealth of existing data on bird occurrence in the Study Area and where relevant, this is referenced in the desk study results and has been used to inform the baseline characterisation presented in **Volume III, Appendix 8-7 Breeding Bird Report [APP-152, APP-153]**, **Appendix 8-8: Non-Breeding Bird Report [APP-154]** and **Volume I Chapter 8: Ecology [APP-060]**. For example, Section 4.1 of **Volume III, Appendix 8-8: Non-Breeding Bird Report [APP-154]** references bird records from publicly available online resources, such as eBird, at sites including Topham Wetlands/Topham Ferry Flashes and Norton Common. These records have been reviewed and provide context when considering the identification of relevant features in the Study Area.
Appendix 8-2 states "environmental DNA surveys be carried out on suitable waterbodies within a 250 m buffer of the Solar PV Site Boundary.", but later that "Phase 1 survey between 28 March and 31 March and 25 April 2023, including the areas up to 50 m from the Solar PV Site Boundary." It is unclear whether future surveys are intended to cover a 50m or 250m buffer from the site boundary. 'Phase 1' surveys took place before landowners on adjacent areas were ever consulted for access, so it is unsurprising that 21 out of 28 ponds identified were not surveyed due to lack of access.	The Survey Areas used, along with a justification for these, are set out in Table 8-1 of **Volume I, Chapter 8: Ecology [APP-060]**. The Scheme will utilise District Level Licensing (DLL) for avoiding significant effects on Great Crested Newt (GCN) and, therefore, detailed surveys of all ponds within the Study Area for GCN were not required.
The proposed scheme covers a total area of 540ha. Given that the vast majority of this area will be covered with panels, an enormous area of habitat for ground nesting birds will be lost. Bird species particularly affected are likely to be Skylark, Meadow Pipit, Grey Partridge and Eurasian Curlew. Previous studies suggest that ground-nesting birds avoid breeding in areas with PVs (Montag et al., 2016) – meaning these species will be displaced from the entire area resulting in the loss of significant breeding populations. As such, an accurate assessment of the numbers of territories of these species within the project area is highly important – if any commitments to biodiversity net gain are to be considered genuine.	An assessment of impacts to ground-nesting birds, including displacement from the presence of Solar PV Panels, is presented in **Volume I, Chapter 8: Ecology [APP-060]** and are discussed in relation to the specific species identified in further detail in earlier rows of this response.
Whilst we recognise the completed scheme is unlikely to present a high degree of disturbance to wildlife, we remain keen to see the specifics of the proposal regarding a) lighting around the site, particularly at any potential substations b) low-level electrical hum from any potential substation.	Information regarding lighting around the Solar PV Site during both construction and operation and maintenance phases can be found in **Volume I, Chapter 2: The Scheme [APP-054]**. During construction, lighting would be directional and task specific to minimise any impacts on surrounding homes or habitats. The full lighting strategy for the construction phase is set out in the **Framework CEMP [APP-196]**, with a lighting scheme to form part of the detailed CEMP secured by Requirement 11 in Schedule 2 to the **Draft DCO [APP-220]**. With this in place, the impacts of lighting on surrounding human and environmental receptors has been assessed to be not significant. The lighting strategy for the operational and maintenance phase is set out in the **Framework Operational Environmental Management Plan (OEMP) [APP-197]** which includes details on lighting design. During operation and maintenance, the Solar PV Site would not require artificial lighting other than during temporary periods of maintenance/repair. Task specific and fixed 'general' lighting will be used at the On-Site Substation, BESS Area and at the Operations and Maintenance Hub during the winter months (in early mornings and evenings only) to maintain safe working conditions. There are not anticipated to be any effects on surrounding environmental habitats from this lighting. Noise impacts have been assessed as set out in **Volume I, Chapter 11: Noise and Vibration [APP-063]**. The housing of equipment would be designed applying good practice and using all reasonable measures

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	to minimise noise emissions. **Volume II, Figure 11-2: Operation and Maintenance Noise Contours with Noise Monitoring and Receptor Locations [APP-117]** presents noise contours for equipment during the operation and maintenance phase of the Scheme. Noise from operational equipment is not considered to be significant and there are not anticipated to be any effects on surrounding environmental habitats from noise during the operation and maintenance phase of the Scheme.
The BHTs primary concern around disturbance to wildlife is during the construction phase of the project. Whilst this is billed as being 'months' we believe this is a long enough period to potentially cause serious perturbations on the ecological communities and the adjacent sites managed for biodiversity and public amenity.	An assessment of the construction phase is presented in **Volume I, Chapter 8: Ecology [APP-060]**. With the embedded avoidance and mitigation measures set out in Section 8.10 of **Volume I, Chapter 8: Ecology [APP-060]** concludes there will be no significant adverse effects to important ecological features. It should be noted that the location of construction activities will change throughout the construction phase to focus on different areas within the Order limits. Therefore, no single area within or surrounding the Order limits will experience prolonged impacts as a result of construction activities.
We are aware that given the current climate in global supply chains the nPlan schedule dataset suggests that nearly nine in 10 large-scale construction projects (85.5%) are delivered late; nearly two-thirds of them (59.4%) by at least two months. Meanwhile, nearly a quarter of projects (22.7%) are delivered more than 250 days late, and more than one in 10 (13.4%) are delayed by at least a year (NCE, 2022). In this context, it is not unreasonable to expect that the construction phase is likely to be drawn out beyond initial projections. Construction at the BOOM site at Cleave Hill, Kent has not run to the initially expected schedule – we would be grateful for confirmation of how long this phase has taken so far at other sites. The trust is also concerned that the projected construction phase will take place from 7am to 7pm, rather than normal working hours. Operating until 7pm in the winter months implies that work will take place after dark, presumably using floodlights. Is this the case? We are also concerned that much of the site is heavily clay soil which becomes heavily inundated for much of the winter. Any use of plant on these saturated soils is likely to seriously affect areas of low-nutrient grassland and potentially result in soil compaction.	The overall construction phase for the Scheme would last an estimated 24 months (24 months to construct the Solar PV Site and 12 months to construct the Grid Connection Corridor, completed in tandem). Whilst the construction phase may be extended, these estimated durations have been used as a worst-case assumption for the technical assessments presented in **Volume I, Chapter 6** to **Volume I, Chapter 14 [APP-058 to APP-066]** as a longer construction phase would mean reduced intensity of activity, for example to present the maximum predicted daily traffic flows and the amount of construction activity that could occur at any given time. Therefore, a longer construction phase would be expected to present lesser impacts as a result of the Scheme. As detailed in **Volume I, Chapter 2: The Scheme [APP-054]** and **Framework CEMP [APP-196]**, core working hours onsite will be 07:00 to19:00 Monday to Friday and 07:00 to 13:00 on Saturday. These hours will be shortened if working would necessitate artificial lighting and therefore the working day may be shorter in the winter months (with the exception of emergency works or HDD which may occasionally require continuous 24 hour working). A **Framework SMP [APP-199]** has been produced to support the Application. This includes good practice measures in Section 4 to be followed to minimise damage to soil structures, such as preventing trafficking/driving of vehicles/plant or materials storage to occur outside designated areas and using low ground pressure (LGP) models and tracked vehicles, where practicable.
The BHT has several concerns regarding noise pollution during the construction phase.	As set out in **Volume I, Chapter 11: Noise and Vibration [APP-063]**, measures to minimise disturbance from noise as a result of the construction phase of the Scheme are secured in the **Framework CEMP [APP-196]** which includes Best Practicable Means (BPM) to be applied, as far as reasonably practicable. The erection of the Solar PV Mounting Structures will typically consist of driving the mounts directly into the ground using a small, tracked post driver, followed by Solar PV Panels being attached by hand. Grid Connection Cables and On-Site Cables would largely require a trench to be dug and refilled once the cables are inserted. The exception of this is where HDD is required. Typical construction working hours during the week are from 07:00 to 19:00 (shortened if working would necessitate artificial lighting) and the location of construction activities will change throughout the construction phase to focus on different areas within the Order limits. Therefore, noise produced by construction activities is expected to be limited and no single area within or surrounding the Order limits will experience prolonged noise impacts.
Given the proximity of some planned areas of paneling to the BHT wetlands at Topham we are concerned about the potential impact to some songbirds on the land immediately adjacent and do not believe this impact has been adequately considered. Construction noise has the potential to wholly reshape bird communities, by interfering with certain species capacity for pairing and territorial establishment. Anthropogenic noise pollution is considered a strong selective force shaping the ecology of birds worldwide (Francis et al.,	An assessment of the construction phase is presented in **Volume I, Chapter 8: Ecology [APP-060]**. With the embedded avoidance and mitigation measures set out in Section 8.10 of **Volume I, Chapter 8: Ecology [APP-060]** concludes there will be no significant adverse effects to important ecological features. The Applicant refers to the responses above regarding comments on specific species.

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2011). There is even direct evidence that Reed Bunting specifically (a species with 5-7 pairs within 250m of the site boundary), alter their singing behavior and have a measurably reduced chance of attracting mates as a result of anthropogenic noise (Gross et al., 2010). Noise impacts are particularly likely to affect species such as Grasshopper Warbler and Marsh Warbler (a species with ~8 pairs nationally which bred 250 m from the site boundary). These rely almost exclusively on song for mate attraction. Breeding small numbers in widely disjunct patches of habitat, meaning they must attract other overflying individuals by broadcasting their songs over the maximum possible distance during extended bouts of dawn and nocturnal song. It is difficult to conceive of two British bird species which would be more susceptible to the impacts of construction noise. The BHT is especially concerned considering the unusually early planned start time of works of 7am includes peak spring dawn chorus activity periods in temperate regions (Gil & Lluisa, 2020). 7am corresponds with only 10 minutes after dawn at the beginning of the bird breeding season (March 1st), when territory establishment amongst resident species is at its peak. Delaying the commencement of noise-emitting works to 9am would help mitigate these ecological impacts considerably across the whole site and help reduce the potential for negative human health impact.	Further discussion on potential noise disturbance from construction activities is provided in relation to the specific species detailed in earlier rows of this response. Construction noise is expected to be limited, with no single area within or around the Order limits experiencing prolonged noise impacts.
We are quite astounded that the public amenity provided by the Burnet managed land at Topham, including the associated bird hide is completely unmentioned in the appraisal of potential noise effect of construction work. In fact, the Chapter 11 of the PEIR report appear to deliberately go out of its way to play down the amenity of this area. 11.4.11: "operation and maintenance, and decommissioning phases of the Scheme would only affect Public Rights of Way (PRoW) users for limited periods of time when they are in close proximity to a noise source." 11.4.13: "Given the linear nature of PRoW, the range of noise impacts along them forming the ambient noise environment, and the transient usage of a PRoW, a material change in the experience of using the PRoW as a whole as a result of noise emissions from the Scheme, which could affect PRoW users' health or quality of life, is not anticipated. Consequently, no significant adverse effects on PRoW users have been identified as arising from the Scheme" Non-technical summary 6.8.19: "There are no visitor attractions within 500 m of the Site Boundary." The bird hide at Topham Ferry Ings has been in place for over 5 years. The site includes a 40m permissive footpath from the Trans-Pennine Trail (TPT) and a permanently accessible public bird hide viewing over the Topham Ferry Ings and River Went. It was put in place by the BHT (a registered charity seeking to protect wildlife and the amenity of the countryside, at a cost of over £11,000). Visitors and walkers often stop for lunch at the hide and the average period of use is well over 15 minutes. The hide is 250m from the proposed development site boundary and therefore its amenity is likely to be very seriously affected by construction noise. Topham Ferry Bridge lies even closer to the proposed development site. TPT walkers and cyclists also frequently stop for several minutes on the bridge to enjoy the tranquillity and overlook the wetlands along the river. The lack of inclusion of these sites for even consideration as any kind of amenity is of serious concern to the BHT.	Table 3-7 of the **Framework CEMP [APP-196]** states that BPM will be implemented, where reasonably practicable, to reduce noise and vibration from construction activities at nearby sensitive receptors, including PRoW and other amenities. As discussed in **Volume I, Chapter 11: Noise and Vibration [APP-063]**, the Applicant acknowledges that short-term exposure to noise can cause disturbance to PRoW users and result in adverse noise effects. However, given the linear nature of PRoW, the range of noise impacts along them forming the ambient noise environment and the transient usage of a PRoW, a material change in the experience of using the PRoW as a whole as a result of noise emissions from the Scheme which could affect PRoW users' health or quality of life is not anticipated. This conclusion is also applicable to other nearby routes, including the Trans-Pennine Trail to the northeast of the Order limits and Footpaths 35.3/15/1 and 35.3/15/2 to the north of the Order limits. As discussed in further detail in the earlier rows, noise produced by construction activities is expected to be limited and no single area within or surrounding the Order limits will experience prolonged noise impacts. As confirmed in Table 12-15 of **Volume I, Chapter 12: Socio-Economics and Land Use [APP-064]**, the bird hide and associated permissive path at Topham Ings East and West has been considered as a community and recreational facility within 2km of the Solar PV Site. Table 12-27 confirms that construction effects to community facilities and visitor attractions would be temporary and not significant. Noise modelling for receptors in Topham, as presented in **Volume I, Chapter 11: Noise and Vibration [APP-063]**, show that average noise levels may be between 5 dBA and 10 dBA higher than baseline levels based on worse-case construction noise activities. These predictions represent a worst-case scenario where all construction plant is operating simultaneously and, therefore, noise predictions are likely to overestimate construction noise levels in this area.

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The significance of the TPT itself as a public amenity seems to have been underestimated. The route is a nationally promoted coast to coast route, suitable for walkers, cyclists and at some locations, horses, and wheelchairs. Also omitted from the PEIR is much mention of the North Yorkshire public footpaths 35.3/15/2 (Sel - Blane) and 35.3/15/1 (Sel - Blane), which form a route from the TPT at Topham Ferry Bridge, along the north bank of the River Went to join Doncaster's Fenwick Public Footpath No.06 and North Yorkshire's 35.3/14/1 (Sel-Balne). This is a 2-mile (approx.) route, providing a pleasant 45-60mins walk along the river, through land managed for both conservation and farming, all of which is only 50-120 metres from the development site's northern boundary. Here, as with Topham Ferry Bridge, there will undoubtedly be both a visual impact and serious noise disturbance during construction.	
When examining public rights of ways, the report seems only to attach value to 'routes to work' or those connecting to urban areas. The criteria used to assess the impact of the development on PROWs focuses on increases/decreases in journey time, changes to user travel plans and opportunities to access the wider network. These are reasonable factors to include in any assessment criteria however there is no mention of rural PROWs as a health and wellbeing resource, even when not providing a simple route from A to B. As many people discovered during the Covid-19 pandemic, walking outdoors, even for short periods, can have a positive impact on both physical and mental health and well-being. These benefits are amplified when a route is within nature, in our countryside and greenspaces. "While walking has well-known health benefits, the characteristics of a walk matter to the type and extent of benefits that individuals receive. One study suggests that walks in farmland and green corridors can outperform walks in urban, non-natural environments in terms of their ability to positively impact perceived stress and emotional wellbeing.30 Another study specifically distinguishes walking within nature as having greater benefits than viewing nature or walking in spaces lacking natural elements, in relation to its mental health impact.31 ". "The naturalness of a walking route can also play a key role in incentivising community uptake. While the distance to retail and service destinations has been found to be a critical factor determining engagement in walking, issues such as the perceived quality of the recreational destination, and the attractiveness of the route itself are also found to be key.33 "(Chapman et al. 2023). As these studies suggest, a route has more value than its ability to convey a user from A to B in the most expedient manner. The landscape, character, nature, and quietness a route can offer to a user can be equally, if not more valuable. The routes within, around and close to the proposed development area, may not be busy routes to school or places of employment but most are within a few minutes' walk of one of the three small settlements, interconnecting the three, and offering these communities immediate access to greenspace and nature and all the benefits that brings. People don't have to be walking to somewhere, they can just be walking to enjoy nature, views, quiet and exercise; be that a 30-minute daily dog walk or a longer walk to watch wildlife, along the riverbank. Contrary to the statement in 11.4.13 which states" no significant adverse effects on PRoW users have been identified", the trust feels that these walks, and therefore user enjoyment and wellbeing, will without doubt, be negatively impacted by the noise disturbance of the construction phase of development. The Rambler 2023 research (Chapman et all. 2023) highlights Doncaster as one of several UK towns to have the highest concentrations of communities, with the poorest PROW provision, with 10% of the 333 communities with the lowest decile for the assessment criteria, being in the Doncaster area.	The Applicant notes the concern regarding the interaction between the Scheme and nearby PRoW, including the importance of these in providing local communities with resources to maintain their health, wellbeing, and access to nature. The impact of the construction phase on PRoW have been assessed in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]**, **Volume I, Chapter 11: Noise and Vibration [APP-063]**, and **Volume I, Chapter 12: Socio-Economics and Land Use [APP-064]**. The Applicant has carefully chosen access locations for construction vehicles to minimize interactions with PRoW and will implement robust safety procedures for PRoW users, as outlined in the **Framework PRoWMP [APP-202]** and the **Framework CTMP [APP-206, APP-207]**. Any temporarily closed PRoW will have an appropriate local diversion in place to ensure continued access for the local community, as detailed in the **Framework PRoWMP [APP-202]**. **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** acknowledges that some views from PRoW will be affected during the construction phase of the Scheme. However, where potential adverse visual effects have been identified, landscape mitigation measures, including vegetative screening, have been integrated into the design to minimize impacts. The design also incorporates buffers between PRoW and perimeter fencing, with fencing set at least 20 m from the PRoW centreline on either side when Solar PV Panels are present on both sides (creating a 40 m wide corridor) or 15 m away if Solar PV Panels are on one side only. An additional 5 m buffer will be maintained between the perimeter fencing and the Solar PV Panels. Further details on landscape mitigation can be found in the **Framework LEMP [APP-203]** and the Indicative Landscape Masterplan in Appendix A of this document.

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This highlights the importance of not only maintaining and protecting PRoWs in the town but also the importance of enhancing and improving the existing provision with the area. The report talks of minimising PRoW closures and impacts but no effort has been made to actively improve the PROW network and connectivity within it. We suggest some ways to do this within the ecological mitigation areas in '8. Suggested additional mitigation' and recommend BOOM consider these options if their commitment to communities is real.	
Since much of the planned mitigation areas currently fall within low-lying or seasonally flooded areas, they are already unlikely to be feasible to set panels. However, they are also already the highest biodiversity areas of the site, meaning that ecological mitigation in these areas is unlikely to yield much in terms of biodiversity gain. For example, Skylark territory density is between 0.05 to 0.25 territories per hectare in farmland (Donald et al., 2001) – this equates to a total of 27 – 135 territories across a 540ha site. the total site footprint ~50ha (~9%) is currently planned as ecological mitigation. Assuming a worst-case scenario of 0.05 t/ha (territories per ha) for the whole site and a best case of +0.2 t/ha through ecological mitigation this would still only mitigate roughly 10 territories, suggesting that at least double the amount of mitigation area is needed to avoid significant biodiversity losses of grasslands specialists.	The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by detailed ecological surveys and a design team with qualified professional ecologists. This includes avoidance and retention of habitats of greater value for biodiversity, such as hedgerows and woodlands, buffers to protect existing features, and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. The Applicant has submitted a **BNG Assessment [APP-200]** which sets out how the Applicant will deliver net gains in habitat units, hedgerow units and watercourse units. All gains will be delivered within the Order limits and are in line national and local strategic policies for BNG and 'BNG Good Practice Principles for Development' (CIEEM, IEMA and ciria, 2019). This means that appropriate areas have been identified and targeted for generating gains, whilst accounting for existing baseline conditions. An assessment of the potential impacts on Skylark is presented in **Volume I, Chapter 8: Ecology [APP-060]**. The Applicant acknowledges in this assessment that habitat creation and enhancement measures will not replicate the total area of arable farmland currently available and therefore, will not provide like for like mitigation for all territorial male Skylark recorded. However, the provision of a stable quantity of improved quality habitat (i.e. permanent grassland) will deliver improved productivity (i.e. through increased number of broods, nest success, prey resource, etc.) which will help maintain the local population.
Given the scale of the project we are concerned that such a large area of PVs could effectively act as a landscape sink for some species of aquatic invertebrate populations. Whilst the scientific literature is still small, there are studies suggesting polarized light can be mistaken by aquatic invertebrates for bodies of water. An ideal first step would be to test small number of panels and survey the numbers of dead aquatic invertebrates collecting on them.	Artificial horizontally polarising surfaces (such as the Solar PV Panels) possess reflection-polarisation characteristics of which are similar to those of water and, therefore, have the potential to attract polarotactic insects posing a potential threat to these species. Aquatic macroinvertebrates in their terrestrial or airborne phase may be attracted to these surfaces which may then disrupt their life cycle. Some aquatic insects are attracted to Solar PV Panels, although this is an unusual event dependent on the coincidence of several suitable conditions to trigger such behaviour (e.g. wind direction and cloud cover). As per **Volume I, Chapter 8: Ecology [APP-060]**, the likelihood of aquatic insects from this particular local aquatic habitat of Local Importance being attracted to large open areas of shiny surfaces is considered low given that such species will preferentially use smaller shiny surfaces. Most of the aquatic insect species identified during the desk study are of low conservation value, and do not use open water areas for any of their behaviours (i.e. few *Odonata* (dragonflies) were recorded for example). The impact of the Solar PV Panels on these aquatic insects would therefore be negligible.
Other proposed solar projects (including those being created by BOOM in East Yorkshire and East Kent), target comparable areas of land (flat, low-quality farmland with proximity to existing power infrastructure). The similar nature of these areas means that they also result in the loss of similar habitat types. Typically, poorer soil areas support less intensive agriculture and therefore have higher biodiversity, which support higher than average number of grassland species than where agricultural intensity is high. As such they often constitute breeding areas	**Volume I Chapter 15: Cumulative Effects and Interactions** identifies the relevant projects (including solar schemes) to be considered for cumulative effects. This is based on the ZoI of the Scheme on relevant important ecological features and where interactions with other projects may occur. This list has been agreed with the relevant authorities and statutory consultees. Section 8.15 of **Volume I, Chapter 8: Ecology [APP-060]** considers the cumulative effects of these projects on important ecological features.

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for species such as Grey Partridge and Curlew which are already extirpated from wider landscapes. Of the 33,031.7 ha of proposed solar farm development in the UK, 3,363 ha are in our region, and we are sure some were missed from our searches. Schemes identified include East Yorkshire Solar Farm (1276ha), Carr Farm (101ha), Grimethorpe (88ha), Old Malton (72ha), Dinnington (116ha), Marr (77ha), Dunsville (133ha) and Tween Bridge (1500ha). (https://www.uksolaralliance.org/schemes) The cumulative effect of all these areas on removing the remaining stronghold for these species should not be underestimated. As such, environmental mitigation measure should seek to be of the very highest standard.	
The trust is keen to understand the rationale for the proposal of the project in the Sykehouse and Fenwick area, rather than in closer proximity to the substation at Thorpe Marsh. At the time of the initial scoping consultation, BOOM conveyed that other flat areas closer to the substation were unfeasible do to logistical or flooding concerns. However, the scheme footprint has since expanded from 350ha at Scoping stage in to 540ha at pre-application and now extends an additional 190ha to the South. Our additional concern is if such a large additional area can easily be added to the scheme, there is little to prevent BOOM or other companies from continuing to expand within the same corridor, further adding to the biodiversity impacts, particularly the loss of feeding and nesting areas for grassland birds.	The Solar PV Site has been chosen through a thorough site selection process which is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** and assessed against relevant planning policy in the **Planning Statement [APP-190]**. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable. Additional land was incorporated into the Solar PV Site after non-statutory consultation following positive discussions with landowners in the vicinity of the Solar PV Site. The feedback identified this land as available, suitable, and adjacent to the Solar PV Site. This additional land provided flexibility for designing the Solar PV Panel arrangement and the provision of potential mitigation areas. The Order limits presented in **Volume II, Figure 1-2: Site Boundary Plan [APP-070]** does not include any significant changes from that in the PEIR. This area is the maximum extent of land to be acquired or used for the construction, operation and maintenance, and decommissioning phases. At this stage, no further amendments to the Order limits are anticipated. Any changes to Order limits would require further consultation or a variation application which would enable scrutiny of the amendments from relevant stakeholders.
The Trust believe current proposals for parcels SE6 and SE7 mean a disproportionately negative effect on both biodiversity and the local community. For the gain of only 6.3 ha of solar panels, a biodiverse area of broadleaf woodland would effectively be isolated from adjoining areas under environmental management. This 11ha area was initially conceived as an area for biodiversity by the landowners (D. Boulmer) and the creation of a pond by the Environment Agency was facilitated by BHT. Amphibian and reptile populations (including Great Crested Newt) would be left with only a narrow bottleneck of land to traverse and would be effectively isolated from adjoining wildlife areas during construction of decommissioning phases. The shape of this proposed land will also add an addition 1.2km of site perimeter immediately adjacent to conservation land. The BHT also supports the view of local landowners, that this additional peninsular of the site will have a disproportionate noise impact on property owners – with an additional 11 properties within 400m of the edge of the site being impacted, where the nearest areas of panel construction would otherwise be over 700m away. As such this area should be seriously considered instead, for ecological mitigation or public amenity. The secondary access at West Lane is also of concern. Once an access is in place it seems the discretion over the level and nature of its use will likely rest entirely with BOOM. This access point is particularly concerning from a safety perspective since it is currently situated only 80m from the peak of a blind bridge, where vehicles often travel at considerable speeds.	The inclusion of Field SE6 and SE7 would not result in the permanent loss of ecological connectivity, given that all existing boundary features and vegetation would be retained, provision of offsets from Solar PV Panels, and a continuation of grassland within the fields with an enhanced biodiversity value. Any disturbance during construction would be temporary and limited to the field interiors themselves with areas of greatest value to reptiles and amphibians (i.e. boundary vegetation) remaining undisturbed. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of Environmental Impact Assessment (EIA), statutory consultation, and wide-ranging stakeholder engagement. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable. An assessment of noise impacts from equipment, such as transformers and inverters, on residential receptors is presented in **Volume I, Chapter 11: Noise and Vibration [APP-063]**. With proposed mitigation measures in place, noise from equipment during construction is not considered to be significant and is likely to be less than ambient noise levels. Noise from equipment during operation and maintenance is also not considered to be significant. The housing of equipment would be designed applying good practice and using all reasonable measures to minimise noise emissions. The BESS Area and On-Site Substation do emit some noise when operating and these have therefore been carefully located with respect to residential receptors. Operational noise impacts are assessed in **Volume I, Chapter 11: Noise and Vibration [APP-063]** which concludes that operational impacts will be negligible at all residential receptors. As secured in Paragraph 2.5.5 of the **Framework OEMP [APP-197]**, the access to the Solar PV Site proposed via West Lane will be for emergency use only.

Comments from Relevant Representations	Response to Relevant Representation
The Trust would seek to work with BOOM to ensure that any gains made from environmental mitigation are preserved when the scheme is decommissioned, rather than reverting to the original land use. Ecological perturbations from significant land-use change cause rapid ecological change and there is a risk that 'reversion' during and after decommissioning could result in further damage and the entire land-use of a significant area is changed for second time.	The Applicant welcomes the Burnet Heritage Trust's offer to work with the Applicant regarding environment gains. The Applicant would re-iterate that it is seeking a DCO for a fixed period of time, after which the Scheme, as provided in the DCO, will cease and the land will be returned to landowners, along with all habitats present at the time of decommissioning.
The trust believes that, without sufficient environmental mitigation the scheme also has the potential to foreclose on significant opportunities within wider biodiversity improvement strategies. The Government's '25 Year Environment Plan (2018)' set out actions "to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.". The 'Environmental Improvement Plan 2023: The first revision for the 25 Year Environment Plan', reinforces the 25 Year Environment Plan's vision and details progress to date, including restored habitats in Dorset, £750 million investment tin tree planting and peatland restoration, and the establishment of additional marine protected areas across 35,000 square miles of English waters. The Environment Improvement Plan sets out a plan for the continued delivery of the 25 Year Plan, with ten overarching goals, including the delivery of Nature Recovery Strategies by Local Authorities. All of this with the aim of halting the decline in biodiversity and achieve thriving plants and wildlife. Utilising the expertise and assistance of BHT and YWT to deliver as much mitigation as possible will allow BOOM to have considerable 'buy-in' to future conservation initiatives throughout the catchment and being recognised as supporting improvements in biodiversity nationally through the government's 25 Year Plan, and locally through Local Authority Nature Recovery Strategies.	The Applicant welcomes the Burnet Heritage Trust's offer to work with the Applicant regarding environment gains and delivery of proposed mitigation. As set out in **Volume I, Chapter 8: Ecology [APP-060],** the Scheme has embedded appropriate avoidance and mitigation measures to ensure no significant adverse effects on important ecological features. In addition, the Scheme will create and enhance a wide range of habitats, such as grasslands, hedgerows and trees, that will benefit wildlife present in the area. Details of habitat creation and enhancements are set out in the **Framework LEMP [APP-203].**
We note that much of the existing mitigation plan prioritises the creation of 'broadleaf woodland'. Whilst this is good in principle there are areas where this is not suitable. It is likely that the creation of significant areas of wet woodland in the area along the River Went on the north boundary of the site will vastly reduce the sight-lines necessary for wintering wildfowl as well as compromising considerable areas of existing habitat. All additional areas of scrub and tree planting ought to take place out of the areas regularly flooded by the River Went, preferably where the land begins to flatten at the top of the bank. Away from wildfowl wintering areas, small pockets of woodland along the river will be advantageous, although these should be planned in consultation with BHT.	No woodland planting is proposed along the River Went, tree planting will be provided in the form of individual tree planting in places, and hedgerow enhancement along existing field boundaries south of the River Went. Details of the proposed landscape mitigation integrated into the Scheme design can be found within the **Framework LEMP [APP-203]**, as well as on the Indicative Landscape Masterplan within Appendix A of this document. A detailed LEMP must be approved by the relevant local planning authority prior to construction and is itself secured by Requirement 6 in Schedule 2 of the **Draft DCO [APP-220]**. The detailed LEMP will be substantially in accordance with the **Framework LEMP [APP-203]**.
The BHT considers BOOM's commitment to Biodiversity Net Gain (BNG) laudable, but wishes to caution that the BNG framework is not foolproof in safeguarding biodiversity "Ninety-five percent of biodiversity units delivered in our sample come from habitats within or directly-adjacent to the development footprint managed by the developers. However, we find that these gains fall within a governance gap whereby they risk being unenforceable, a challenge that is shared with other net outcome type policies implemented internationally." (zu Ermassen et al., 2016) Whilst the proposed scheme is not encompassed by current legislation, the document implies that the applicant intends to provide Biodiversity Net Gain within the site boundary. It is our understanding that Biodiversity Net Gain requires not just enhancement of habitat distinctiveness or condition but also measures to ensure that the ecological functionality of the	The Applicant has submitted a **BNG Assessment [APP-200]** using the Department for Environment Food and Rural Affairs (Defra) Statutory Biodiversity Metric (mandatory for non-DCO applications), which sets out how the Applicant will deliver net gains in habitat units, hedgerow units and watercourse units. All gains will be delivered within the Order limits and are in line national and local strategic policies for biodiversity gain and 'BNG Good Practice Principles for Development' (CIEEM, IEMA and ciria, 2019). The delivery of all biodiversity units will be within the Order limits and, therefore, under the strict control of the measures set out in the **Framework LEMP [APP-203]**. For which, a detailed LEMP must be approved by the relevant local planning authority prior to construction and is itself secured by Requirement 6 in Schedule 2 of the **Draft DCO [APP-220]**. Compliance with this will be a legally enforceable element of the DCO. The BNG has been developed with guidance from statutory consultees, including Natural England and City of Doncaster Council.

Comments from Relevant Representations	Response to Relevant Representation
habitat or site is preserved - see Table 10.1 page 78 https://cieem.net/wp-content/uploads/2019/02/C776a-Biodiversity-net-gain.-Good-practice-principles-for-development.-A-practical-guide-web.pdf. Despite acknowledging there will be an impact on ground nesting bird habitat, there is no provision to compensate for this loss of nesting habitat. Simply preventing direct loss of nests by appropriate timing of vegetation clearance or construction is, in our view, insufficient. An additional issue arising from the BNG framework for genuine conservation and biodiversity protection, is that current guidelines specify improvements to habitats lasting 30 years. Whilst the BHT is realistic about BOOM's ability to secure ecological mitigation for a longer duration than the scheme itself (40 years), we would welcome any commitments which can be made for biodiversity protections that can be made in perpetuity – either by buying land outright or helping to facilitate the designation of ecological mitigation areas within submissions for SSSI status. The Trust would urge BOOM to use the Fenwick Solar Farm as an opportunity to deliver 'Real Biodiversity Gain' whereby the company can utilise the expertise and passion (and considerable work) of a group of highly experienced ecologists and conservationists, to deliver beyond the minimum legal requirements. A commitment that would set BOOM apart from industry competitors and circumvent concerns at potential future development sites. In a context where our requested mitigation suggestions are met, the Burnet Heritage Trust is prepared to partner with BOOM in its future endeavors and public relations campaigns to help demonstrate that genuine environmental gains can come from sustainable energy developments.	An assessment of impacts to ground-nesting birds, including displacement from the presence of Solar PV Panels, along with the specific mitigation provides in terms of permanent grassland creation, is presented in **Volume I Chapter 8: Ecology [APP-060]** and are discussed in relation to the specific species identified in further detail in earlier rows of this response. As acknowledged by the Burnet Heritage Trust, at the end of the 40 years, the Solar PV Site will be decommissioned and will no longer be under the Applicant's control. Property agreements have already been established confirming only temporary rights over the land within the Order limits. Further details are set out in the **Framework DEMP [APP-198]**. However, the Applicant remains open to working with Burnet Heritage Trust on the mitigation proposed and its ongoing management. During statutory consultation, the Applicant invited ideas for funding community projects which will add value to the local community in Fenwick and will be established upon operation. The Applicant remains open to suggestions from the Burnet Heritage Trust for ideas which could benefit the local environment. Details of the proposed landscape mitigation, including BNG measures, integrated into the Scheme design can be found within the **Framework LEMP [APP-203]**, as well as on the Indicative Landscape Masterplan within Appendix A of this document. A detailed LEMP must be approved by the relevant local planning authority prior to construction and is itself secured by Requirement 6 in Schedule 2 of the **Draft DCO [APP-220]**. The detailed LEMP will include a post-construction monitoring programme, as stated in Paragraph 6.1.2 of the **Framework LEMP [APP-203]**.
The trust is of the view that through the following actions it would be possible to provide adequate ecological and amenity mitigation of the whole scheme. The geographic context and further details of these suggestions are provided in Figures 4 and 5. I) An additional 39ha of mitigation adjacent to most sensitive areas (7% of the total 540ha footprint of the scheme in a context where an expansion of ~190ha between scoping and pre-application has already taken place). II) Earthworks to create large permanent pools in the River Went floodplain, shallow scrapes in the north-eastern area and a shallow berm (to be planted with scrub) to assist noise attenuation and winter screening. The trust has previously liaised with EA and understands they support earthworks within the floodplain provided material is removed. Correctly designed these areas would likely attract breeding Garganey, Redshank, Little Ringed Plover, Snipe, Avocet and even Common Tern and Spoonbill (a species now breeding at nearby Fairburn Ings and regularly visiting nearby sites). The Went floods the area regularly, so only a relatively small depth of material (20-50cm) needs to removed for the creation of pools. BHT is experienced in the creation of this type of wetland on adjacent sites and can manage works either in concert with BOOM contractors or independently. III) Engagement with BHT to effectively manage areas of ecological mitigation in a way which maximizes biodiversity. IV) Creation of a new (screened) permissive footpath through the Solar Farm, linking to the existing public rights of way network. Further connecting Fenwick, Topham and Sykehouse, away from busy highways, creating new public amenity and supporting the National Planning Policy Framework, which states "Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails." (NPPF, Open Spaces 104).	The Applicant appreciates the detailed proposals put forward by the Burnet Heritage Trust regarding potential ecological and amenity mitigation measures and provides the below responses: I) As stated in Paragraph 2.6.46 of **Volume I, Chapter 2: The Scheme [APP-054]**, an Ecology Mitigation Area will be provided along the River Went and the Fleet Drain, and Heritage Buffer Area will be provided along the Fleet Drain. This is shown in Appendix A of this document and **Volume II Figure 2-3: Indicative Site Layout Plan [APP-074]**. This area will not include any Solar PV Panels and associated infrastructure installed, and the land will be managed to create high quality habitat for priority bird species; provide setting buffer for the Scheduled Monument Fenwick Hall moated site; and preserve the ridge and furrow and preserve in situ areas of archaeological interest identified from the geophysical survey. The Ecological Mitigation Area encompasses a total area of approximately 49 ha. II) As stated in Paragraph 5.3.66 of the **Framework LEMP [APP-203]**, a series of linear wetland scrapes will be delivered within the River Went riparian corridor to create suitable habitat for waders and wildfowl and enhance biodiversity. The exact location of these will be determined through additional site survey work. Where practicable, a network of scrapes of different sizes and depths will be provided. III) Details of habitat creation and enhancements are set out in the **Framework LEMP [APP-203]** and illustrated on the Indicative Landscape Masterplan included as Appendix A of that document. The Applicant will continue to engage with the Burnet Heritage Trust regarding the management of ecological mitigation. IV) The Scheme does not include any permissive footpaths within the Solar PV Site, however, the existing PRoW passing through or running adjacent to the Order limits are expected to be unaffected, aside from Sykehouse 29, Moss 6 and Fenwick 14 which will be permanently diverted. Where the potential for adverse visual effects has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects

Comments from Relevant Representations	Response to Relevant Representation
V) A new community amenity in the form of a bird hide, with permissive access, over-viewing newly created pools VI) Anti-predator fence enclosing a significant area (25ha +) which could include existing high-biodiversity areas where Curlew have bred (at landowners' discretion). Through the inclusion of shallow pools this would likely attract breeding Redshank, Lapwing and Oystercatcher as well as potentially Avocet and Snipe. Shallow scrapes would create damp grassland habitats which Skylark, Meadow Pipit and Grey Partridge all favour. If an anti-predator fence was included these species tend to succeed at far greater densities and would effectively mitigate losses across the whole of the site. VII) A commitment to work with BHT and YWT to secure mitigation areas being protected in perpetuity at the decommissioning stage of the scheme.	as far as possible. Buffers between PRoW and perimeter fencing have also been included in the design, with fencing being installed a minimum distance of 20 m either side of the centre of the PRoW where solar infrastructure lies to both sides (creating a 40 m wide corridor between the fence lines), or 15 m from the PRoW centreline if solar infrastructure is to one side only. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, as well as on the Indicative Landscape Masterplan within Appendix A of this document. V) The Scheme does not include the creation of a new bird hide, however, various enhancements have been included. These are detailed within the **Framework LEMP [APP-203]** and illustrated on the Indicative Landscape Masterplan in Appendix A of this document. VI) As stated in Paragraph 5.3.66 of the **Framework LEMP [APP-203]**, a series of linear wetland scrapes will be delivered within the River Went riparian corridor to create suitable habitat for waders and wildfowl and enhance biodiversity. These will be within the perimeter fencing proposed as part of the Scheme but this will not prevent all predators from accessing the scrapes. VII) At the end of the 40 years, the Solar PV Site will be decommissioned and returned back to its former condition and land use. Some areas of habitat and biodiversity mitigation and enhancement may be left for species protection, but this will be up to the landowners at the time. As noted above, property agreements have already been established confirming only temporary rights over the land within the Order limits. Further details are set out in the **Framework DEMP [APP-198]**. However, the Applicant remains open to working with BHT on the mitigation proposed and its ongoing management. As discussed in earlier rows, the Applicant remains open to suggestions from the Burnet Heritage Trust for ideas to integrate into the community benefit scheme which could enhance the local environment

Table 2-4 Applicant's Response to Relevant Representations – Yorkshire Wildlife Trust

Comments from Relevant Representations	Response to Relevant Representation
Please note that due to the large amount of documentation we have had to focus our resource on the most relevant documents to biodiversity, and may wish to provide further comments as part of the examination. Please also note that we have not been provided with any confidential protected species information so are not able to provide comment. We have already engaged with the statutory consultation for the project, submitting a response in May 2024. We trust that our response will be fully considered as part of the examination. We note that our comments have been included within 5.2 Appendix O1: Section 42(1)(a) Responses to Statutory Consultation and the Applicant's responses. We previously noted that an area within and adjacent to the application site is currently in the submission process to be designated as a SSSI by Natural England. The Burnet Heritage Trust sites (inclusive of the northeast portion of the application site), meet the scoring threshold for SSSI based on bird communities for both lowland wet grassland and lowland fen. From the information provided, this does not appear to have been taken into account. The Ecology Chapter details that candidate Local Wildlife Sites which have not yet been designated are included within this chapter as they are being considered for designation and may become so within the lifetime of the Scheme, and therefore it follows that candidate SSSI should also be assessed as such.	The Applicant notes that the 'Burnet Heritage Trust sites' have been put forward as a proposed SSSI. However, through consultation with Natural England it has not been possible to locate further details on the submission, including the boundary of the area to be designated and the habitats and species assemblages to form the citation. As such, a specific assessment of this potential designated site has not been able to be undertaken. However, the assessment presented in **Volume I, Chapter 8: Ecology [APP-060]** does consider the impacts on all relevant habitats and species which are likely to comprise the proposed SSSI, including within the Went Valley (near Skyehouse) LWS which encompasses the eastern extents of the Burnet Heritage Trust's land. Therefore, while no assessment of the proposed SSSI itself is presented, the impacts to its relevant component features have been assessed. The Applicant will continue to engage with the Yorkshire Wildlife Trust regarding the approach to the assessment of impacts on the proposed SSSI.
We may comment further on the ability to fully mitigate and compensate for ground nesting bird impacts within the Order limit.	The Applicant refers the Yorkshire Wildlife Trust to **Volume I, Chapter 8: Ecology [APP-060]** which provides a full assessment of the potential impacts of the Scheme on ecology and nature conservation in line with relevant guidance for undertaking Ecological Impact Assessment. Table 8-13 identifies that there will be negligible to minor adverse effects to ground nesting birds due to a loss of arable fields used by a small number of species, however, this is not significant. The Scheme has been designed to avoid and/or mitigate all significant adverse effects which has been achieved through a carefully considered and iterative design process informed by comprehensive ecological surveys and input from qualified professional ecologists. As stated in Table 8-10 of **Volume I, Chapter 8: Ecology [APP-060]**, areas of undeveloped land have been included within the Solar PV Site to provide permanent habitat for ground-nesting birds which will be managed as grassland. Detail regarding the habitats that will be provided and managed as part of the Scheme is secured within the **Framework LEMP [APP-203]**. In addition, the **Framework CEMP [APP-196]**, **Framework OEMP [APP-197]**, and **Framework DEMP [APP-198]** secures ecological mitigation measures to minimise impacts to ground nesting birds during the construction, operation and maintenance, and decommissioning phases. The Applicant has updated the NSER for Deadline 1 to address comments in Natural England's Relevant Representation regarding the impact of the Scheme on functionally linked land for qualifying bird features of the Humber Estuary SPA/Ramsar. An SoCG between the Applicant and Natural England has been submitted for Deadline 1 and confirms Natural England agrees the updates to the NSER address their concerns on this matter.
We continue to have concerns about the longevity of the habitat creation and enhancement proposed to be de livered as part of the scheme (common with all solar schemes), which we believe should be permanent. We note the comment that 'Any habitat creation and enhancement will remain for the lifespan of the Scheme. Upon decommissioning all physical infrastructure will be removed, with the land, including created habitats, returned to landowners. The Scheme will not be responsible for the management of habitats within the Order limits following decommissioning and cessation of the DCO. Gains in biodiversity will be managed	The Applicant is seeking a DCO for a fixed period of time, after which the Scheme, as provided in the DCO, will cease and the land will be returned to landowners, along with all habitats present at the time of decommissioning. The Applicant does not consider it proportionate that the Scheme should have an obligation to secure the habitat creation/enhancements forming part of the Scheme in perpetuity and notes that the proposed approach is consistent with other recently granted solar DCO.

and monitored for the lifespan of the Scheme (40 years), which is beyond the period of 30 Years as per the requirements of the Environment Act 2021'. To support Nature's Recovery, it is essential that benefits delivered by the scheme are secured for the longest possible timeframe. It is our position that areas of habitat creation/enhancement should be secured for nature in perpetuity through legal agreements. We are however, pleased to see that decommissioning surveys are to be undertaken which would need to account for any ecological impacts at this stage.

We note that an area of post-industrial land within the Order limits to the north of the Existing National Grid Thorpe Marsh Substation, possibly qualifies as Open Mosaic Habitats on Previously Developed Land and as such, may support notable terrestrial invertebrate assemblages and species. We agree with this statement as we are aware of significant invertebrate assemblages in close proximity to this area, and would advise this area must be fully surveyed (habitats and invertebrate interest) in order to fully assess the potential impacts of the scheme.

The Applicant notes the comment regarding Open Mosaic Habitat (OMH) on Previously Developed Land. Information regarding this habitat has been considered in the **BNG Assessment [APP-200]**. The Applicant currently has no intention to sell BNG credits from the Scheme.

Prior to any works commencing, further surveys will be undertaken to determine the value and condition of these habitats and the impact of the Scheme on these. As stated in Table 3-3 of the **Framework CEMP [APP-196]**, pre-construction site walkovers will be undertaken in advance of mobilisation/any potential advance works to re-confirm the ecological baseline conditions and to identify any new ecological risks. The Applicant will produce a detailed CEMP post consent, during the detailed design stage, that will be in accordance with the **Framework CEMP [APP-196]**, as secured by Requirement 11 of Schedule 2 in the **Draft DCO [APP-220]**. The detailed CEMP must be approved by the relevant local planning authority prior to construction.

2.4 Statutory Consultees

Table 2-5 Applicant's Response to Relevant Representations – Environment Agency [RR-003]

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Dear Sir/Madam, Fenwick Solar Farm – Development Consent Order Application Fenwick, Doncaster Registration as Interested Party and Submission of Relevant Representations We are advised that on 04 December 2024 an application (reference: EN010152) for a Development Consent Order (DCO) was accepted by the Planning Inspectorate for examination. These Relevant Representations contain an overview of the project issues which fall within our remit. They are given without prejudice to any future detailed representations that we may make throughout the examination process. We may also have further representations to make when supplementary information becomes available in relation to the project. We have reviewed the draft DCO, Environmental Statement (ES) and supporting documents submitted to the Planning Inspectorate as part of the above-mentioned application.	The Applicant welcomes the comments received from the Environment Agency regarding the documents submitted as part of the DCO Application for the Scheme. Responses to specific comments received from the Environment Agency are provided below. It is noted that the Environment Agency may provide further representations as additional information becomes available throughout the Examination and the Applicant will remain responsive to any further queries.
Key Issues Our key issues are identified below and our more detailed issues can be found in Appendix 1. We believe these issues can be resolved through the inquiry process with the developers cooperation. 1. The modelling underpinning the submitted flood risk assessment is unsound. Therefore, there is a risk that the submitted FRA is inaccurate and the proposed mitigation measures are not appropriate. This includes the assessment of changes in sea level due to climate change has not been assessed. The River Don is a tidally influenced watercourse and therefore is likely to be impacted by rising sea levels. We understand an updated model will be submitted in due course. 2. The scope of the FRA for the cable corridor is insufficient. The Thorpe Marsh water storage area is an Environment Agency asset. The impact upon this asset from the scheme has not been adequately assessed. 3. It is not possible for us to currently support the applicant's request for disapplication. We have concerns about the lack of information regarding the disapplication of Flood Risk Activity Permits (FRAP) under the Environmental Permitting Regulations (2016). In addition, we have updated our standard Protective Provisions and have issued them to the applicant.	The Applicant considers the modelling undertaken for the Scheme to be robust, along with the assessment and mitigation presented in **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]**. The hydrology assessment and modelling have been undertaken according to industry standard methods. The Applicant notes the detailed model review provided by the Environment Agency on 19 February 2025, and particularly the observation raised in relation to the comparison between the river levels that the Topham Ferry Bridge gauge observed and the levels modelled for the Scheme. The Applicant has engaged with the Environment Agency further on this and is completing sensitivity testing to understand any reconciliation required between the observed and modelled levels, and any impact on the assessment presented in **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]**. The updates to Volume III, Appendix 9-3: Flood Risk Assessment will be submitted for Deadline 2 of Examination. The Applicant notes that the water levels modelled in the Credible Maximum Scenario at the Topham Ferry Bridge gauge exceed the levels in the observed flood events referenced in the comparison. The Credible Maximum Scenario is a more extreme event than the design event, so the Applicant suggests that flood extents and levels presented for the Credible Maximum Scenario demonstrate that the key conclusions and mitigation proposed within **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]** are unlikely to change as a result of an increase in the design flood extent/level. The Applicant also notes that the detailed model review provided does not raise any issues relating to the impact of climate change on tidal levels upon the assessment of the Scheme. The potential impact to the Thorpe Marsh WSA has been considered in **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]**. Paragraph 7.3.2 confirms that the Applicant will continue to engage with the Environment Agency regarding the construction of the Grid Connection Cables beneath the WSA and agree a suitable methodology, including the use of HDD at a sufficient depth to avoid compromising the structural integrity of the WSA. The Applicant has provisionally agreed a form of protective provisions for the benefit of the Environment Agency which are included within the **Draft DCO [APP-220]** as Part 5 of Schedule 14. Subject to the resolving of outstanding technical matters, the Applicant understands that the

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
	parties will be in a position to agree disapplication under the Environmental Permitting (England and Wales) Regulations 2016..
Additional Requirements A number of additional requirements are necessary (a full list of these can be found in Appendix 2) These include: • The Thorpe Marsh water storage area is an Environment Agency asset. The works will require detailed project design and the Environment Agency requests early involvement in the development of these details. Please note Horizontal Directional Drilling may still be required depending on the design option chosen.	The potential impact to the Thorpe Marsh WSA has been considered in **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]**. However, the Applicant is in the process of updating this document to provide further clarity regarding the assessment of potential impacts to the Thorpe Marsh WSA presented by the Grid Connection Cables and the mitigation integrated into the Scheme design. This update will not change the findings of the assessment. The updates to Volume III, Appendix 9-3: Flood Risk Assessment will be submitted for Deadline 2 of Examination. The Applicant has provisionally agreed a form of protective provisions for the benefit of the Environment Agency which are included within the **Draft DCO [APP-220]** as Part 5 of Schedule 14. These allow the Environment Agency to have input and sign off on any detailed design which impact any assets managed by the Environment Agency, including the Thorpe Marsh WSA. Further detail will be added into the detailed CEMP post consent and at the detailed design stage. The Framework CEMP has been updated for Deadline 1 to confirm that the depth and method of construction around the Thorpe Marsh WSA will be identified through liaison with the Environment Agency and that HDD will be used at a sufficient depth to avoid compromising the structural integrity of the WSA.
• Areas of Source Protection Zone 3 have not been considered. Measures to protect the SPZ3 are required in the Outline Code of Construction Practice.	Source Protection Zones within the Solar PV Site and Grid Connection Corridor have been considered as part of the assessments in **Volume I, Chapter 9: Water Environment [APP-061], Volume III, Appendix 14-3: Phase 1 PRA – Solar PV Site [APP-183]** and **Volume III, Appendix 14-3: Phase 1 PRA – Grid Connection Corridor [APP-184, APP-185].** Section 9.7 of **Volume I, Chapter 9: Water Environment [APP-061]** identifies all Source Protection Zone (SPZ) within the Order limits as part of the baseline conditions. The Applicant confirms that all SPZ within the Order limits have been considered as part of the groundwater assessment for the Scheme which, whilst not explicitly listed, includes the area of SPZ3 at the southern end of the Grid Connection Corridor. Whilst **Volume III, Appendix 14-3: Phase 1 PRA – Grid Connection Corridor [APP-184, APP-185]** does not explicitly identify SPZ as potential sensitive receptors, the Applicant can confirm that all SPZ within the Order limits have been considered as part of the assessment. The mitigation measures provided in Section 3.4 of the **Framework CEMP [APP-196]** address the potential impacts to groundwater and surface water resources. This document has been updated for Deadline 1 to explicitly state that the mitigation measures are relevant to SPZ within the Order limits. Further detail will be added into the detailed CEMP post consent to incorporate any final mitigation confirmed at the detailed design stage.
• The detailed Environmental Plans (Construction Environmental Management Plan(s), Operations Environmental Management Plan(s) and Decommissioning Environmental Management Plan(s)) should be submitted to the Environment Agency for consultation. We may request additional considerations outside of the Framework CEMP, Framework OEMP, and Framework DEMP as the proposal develops.	The Applicant will produce detailed Environmental Management Plans, which must be substantially in accordance with the Framework plans as submitted, prior to commencing the construction, operation and maintenance, and decommissioning phases of the Scheme as secured by requirements 11, 12 and 18 of Schedule 2 in the **Draft DCO [APP-220]**. These requirements have been updated in the Draft DCO for Deadline 1 to include consultation with the Environment Agency prior to approval of these plans. It is noted that additional considerations may be requested by the Environment Agency as the detailed design develops and the Applicant will remain responsive to any further requirements.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
In order for the Environment Agency to advise determining authorities in the discharge of requirements we need sufficient time to review documentation. We will require 21 days to review consultations on matters specified in the requirements.	The Applicant acknowledges the Environment Agency's requirement for adequate review time for consultations by the determining authorities. Schedule 15 of the **Draft DCO [APP-220]** provides that, where a Requirement specifies that consultation with a requirement consultee is required, the relevant local planning authority must issue the consultation to the requirement consultee within 10 working days of receipt of the application for discharge of the requirement. The relevant local planning authority has eight weeks from the date of the application for the discharge of requirement in order to discharge that requirement. Accounting for the maximum 10 working day period for the relevant planning authority to issue consultation, that leaves 6 weeks from any consultation being issued to the Environment Agency until the relevant planning authority would need to make its final decision (being twice the 21 days requested by the Environment Agency).
Consent strategy It is recommended that a consents strategy is included in submissions. This is to ensure all parties are clear (including the public) what permits and consents are required and for what areas. We will continue to work with the Applicant to address the issues we have identified as we move towards the Examination stage.	The Applicant requires a range of consents and agreements to construct and operate the Scheme. As explained in the **Explanatory Memorandum [APP-222]**, direct powers which replace the need to obtain some of these consents are included in the **Draft DCO [APP-220]**, however there are other consents from different regulatory organisations that will be required separately to the DCO. The need for such consents and how these are to be obtained is explained in the **Consents and Agreements Position Statement [APP-017].**
Appendix 1 – Environmental Statement and supporting documents - key issues and advice Flood Risk Topic - Thorpe Marsh water storage area Document Reference - ES 2.4.9, 9.7.70, Table 9-20, FRA 1.2.1.e., FRA 6.6.1, FRA 6.6.3, FRA Table 6-2, FRA 7.3.2. Issue Reference - EAFR-001 Issue - Inadequate assessment of flood risk for cable corridor into Thorpe Marsh flood storage area. Impact - Increased flood risk, potential adverse effects on flood assets. Solution - Provide an assessment of flood risks associated with the cable corridor approaching and going into the Thorpe Marsh water storage area and outline the proposed methodology. It may be advisable for works to be carried out by HDD. Precautions and mitigations relating to works within proximity to the Thorpe Marsh storage area should be included within the Framework CEMP / CEMP(s). Additional Comments - A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-001.	The potential impact to the Thorpe Marsh WSA has been considered in **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]**. However, the Applicant is in the process of updating this document to provide further clarity regarding the assessment of potential impacts to the Thorpe Marsh WSA presented by the Grid Connection Cables and the mitigation integrated into the Scheme design. This update will not change the findings of the assessment. The updates to Volume III, Appendix 9-3: Flood Risk Assessment will be submitted for Deadline 2 of Examination. The Applicant has provisionally agreed a form of protective provisions for the benefit of the Environment Agency which are included within the **Draft DCO [APP-220]** as Part 5 of Schedule 14. These allow the Environment Agency to have input and sign off on any detailed design which impact any assets managed by the Environment Agency, including the Thorpe Marsh WSA. The Framework CEMP has been updated for Deadline 1 to confirm that the depth and method of construction around the Thorpe Marsh WSA will be identified through liaison with the Environment Agency and that HDD will be used at a sufficient depth to avoid compromising the structural integrity of the WSA. Further detail will be added into the detailed CEMP post consent and at the detailed design stage.
Topic - Cable depths and proximity / buffers Document Reference - ES 9.8.8, 9.8.10, FRA Table 3-4. Issue Reference - EAFR-002 Issue - Absence of cable depths and buffers in proximity to Environment Agency assets Impact - Potential to negatively affect these assets Solution - To agree cable depths and buffer zones Additional Comments - The cable depth will be 5.0m below the lowest surveyed point of the watercourse within the route corridor for Thorpe Marsh Drain (and other watercourses). Additionally, no works would be undertaken within 16m of the landward toe of the flood defences. This should be applicable to the Thorpe Marsh Drain flood assets, the River Don flood assets, the Thorpe Marsh flood storage area assets and the River Went flood assets. A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-002.	The Applicant has included draft protective provisions within the **Draft DCO [APP-220]** which already include requirements for 16 metre buffer zones from flood defences, with any works which do occur within these buffers to be subject to review and approval by the Environment Agency. In addition to this, the Applicant has committed to all cabling beneath the Mill Dike, Wrancarr Drain, Engine Dike and Thorpe Marsh Drain to be at least 5 m below the lowest surveyed point of the watercourse due to the connectivity to the River Don within the **Outline Design Parameters Statement [APP-193]** at page 11-12. Requirement 4 of the **Draft DCO [APP-220]** provides that the detailed design submitted must accord with the **Outline Design Parameters Statement [APP-193]**, ensuring these parameters are secured. The Framework CEMP has been updated for Deadline 1 to confirm that cables will be installed a minimum of 5 m below the lowest point of the above watercourses.

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	As such, the Applicant does not consider a requirement is needed to secure these matters, as they are already secured within the **Draft DCO [APP-220]**.
Topic - Design life of retained components Document Reference - ES 2.5.2, 2.9.6. Issue Reference - EAFR-003 Issue - The design life of the proposal has been defined by a 40-year operational phase. However, some components could be retained (e.g., On-Site Substation, including associated control and metering buildings and 400 kV export cables) Impact - The flood risks associated with these components may not have been assessed for the period that they will be left in situ. Solution - If these components are to be retained, then flood risks will need to be reassessed. Additional Comments - A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-003.	**Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]** is based upon modelling that includes a climate change allowance for the 2080s epoch which spans 2070-2125. Given the development's 40-year design life of the Scheme (2030 to 2070), it is considered that the climate change allowance applied within **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]** is conservative (as detailed within Paragraph 3.4.4) and allows for a period of decommissioning of up to 55 years (2070 to 2125). This has been agreed with the Environment Agency. The Applicant considers the modelling undertaken for the Scheme to be robust, along with the assessment and mitigation presented in **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]**. The Applicant has committed to fully decommissioning the Scheme, where required, but has acknowledged that some components may be retained. This may be, for example, due to it being considered that leaving the export cables underground is less disruptive to local communities and environments than removing them. Within 12 months of the date which the undertaker decides to decommission any part of the Scheme, the undertaker will produce a detailed DEMP for approval by City of Doncaster Council as the relevant local planning authority as secured by Requirement 18 of Schedule 2 in the **Draft DCO [APP-220].** This will include confirmation with City of Doncaster Council as to what components may remain, and if so, whether further controls are required to ensure their suitability in respect of flood risk or other environmental matters. The Applicant notes the Environment Agency's request to include a requirement on this issue. Requirement 18 of Schedule 2 in the **Draft DCO [APP-220]** has been updated for Deadline 1 to require the City of Doncaster Council consults with the Environment Agency before approving the detailed DEMP, to ensure they can comment in respect of matters like flood risk at the time of decommissioning. The detailed DEMP must be substantially in accordance with the **Framework DEMP [APP-198].** This includes formal commitments included in Table 4 (page 30-33) of the **Framework DEMP [APP-198]** to flood risk mitigation measures.
Topic - Decommissioning / DEMP Document Reference - ES 2.9.1, 2.9.3, 2.9.8, 2.9.10, 2.9.9, 5.6.10. Issue Reference - EAFR-004 Issue - Uncertainty in decommissioning phase projected for 2070- 2072 at the earliest. Impact - Adverse effects to flood risk during decommissioning. Solution - Consult stakeholders (LLFA, LPA, IDB, EA) for DEMP approval. Additional Comments - We would expect ourselves and other key stakeholders (such as the LLFA, LPA, and IDB) to be consulted on the DEMP prior to the decommissioning phase commencing. The timeline for decommissioning, and the components to be removed, or kept in situ, should be agreed by key stakeholders. The proposed time-limiting parameter is an operational phase of 40 years, with decommissioning to commence 40 years after commissioning. Consulting key stakeholders at a future date, helps by removing uncertainty in the feedback we provide and ensures that we agree with the approach taken such that it does not adversely affect flood risk. We may request stipulations in addition to the Framework DEMP. A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-004.	Within 12 months of the date the undertaker decides to decommission any part of the Scheme, the undertaker will produce a detailed DEMP for approval by City of Doncaster Council. Decommissioning must commence no later than 40 years following the date of final commissioning. These timeframes are secured by Requirement 18 of Schedule 2 in the **Draft DCO [APP-220]**. The Applicant notes the Environment Agency's request to be consulted on the detailed DEMP. Requirement 18 of Schedule 2 in the Draft DCO has been updated at Deadline 1 to require consultation by City Doncaster Council with the Environment Agency when approving the detailed DEMP.

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Topic - Impermeable areas Document Reference - Table 2-1: Design Parameters, 2.7.25, 9.4.7, 9.8.47, 9.9.89, 9.9.103. Issue Reference - EAFR-005 Issue - Runoff increase from impermeable areas (e.g., Field Stations, control buildings, access tracks). Impact - Increased flood risk. Solution - Manage all impermeable areas with SuDS to mimic existing flow. Additional Comments - FRA 7.2.3.c suggests that access tracks will use permeable material. However, as it is to be compacted, this remains questionable throughout the lifetime of the development and requires localised SuDS. A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-005.	**Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]** has been produced to manage surface water from the Scheme. This considers all elements of the Scheme which could cause an increase in flood risk due to increased runoff and provides surface water management measures to prevent flood risk being increased, including the Sustainable Drainage Systems (SuDS). The design of the Scheme aims to maintain greenfield runoff rates, mimicking the natural drainage conditions of the Solar PV Site, as far as possible, by allowing natural infiltration and limiting the potential for channelisation from rainfall dripping off the Solar PV Panels. New impermeable areas, such as the BESS Area and On-Site Substation, include filter drains leading to attenuation basins to manage drainage. Most access tracks within the Order limits have been considered as permeable and will utilise materials which maintain permeability throughout their design life, including when compacted. A detailed Drainage Strategy will be prepared prior to construction and approved by City of Doncaster Council as the relevant planning authority. As outlined in Paragraph 1.1.7 of the **Framework Drainage Strategy [APP-160]**, the Framework Drainage Strategy "*solely relates to the drainage design of the Solar PV Site and relates to handling surface water generated by new impermeable areas within this part of the Order limits, i.e. the BESS Area and On-Site Substation*". Paragraph 3.1.1 of the **Framework Drainage Strategy [APP-160]** states that the drainage strategy *"aims to mimic the natural drainage conditions of the Solar PV Site as far as possible*". The detailed Drainage Strategy must substantially accord with the **Framework Drainage Strategy [APP-160]**.
Topic - Changes to the existing Thorpe Marsh substation Document Reference - ES 2.4.9, 2.6.35. Issue Reference - EAFR-006 Issue - Insufficient information about proposed changes to the substation. Impact - Potential flood impacts unknown. Solution - Provide detailed plans of proposed changes. Additional Comments - A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-006.	All work to the Existing National Grid Thorpe Marsh Substation would be undertaken by National Grid under the terms of the Scheme's grid connection agreement and would remain under National Grid's control. These works do not form part of the authorised development in Schedule 1 of the draft DCO. The Applicant notes the Environment Agency's request to include a requirement regarding this issue in the **Draft DCO [APP-220]**, however, this is not considered necessary or appropriate given the works do not form part of the authorised development.
Topic - Flood storage compensation Document Reference - ES 2.7.3, Table 9-22, FRA 7.2.1. Issue Reference - EAFR-007 Issue - The loss of flood storage volume from multiple developments over a period can potentially lead to cumulative loses of flood storage volume which are significant. Impact - Cumulative increase in flood risk. Solution - Provide flood storage compensation. This should: • Be localised to the loss, • Be level-for-level • Be volume-for-volume • Not inhibit flood flow routes. The flood storage compensation should occur early within the construction phase to ensure it is in place before any losses occur. Compensation should account for any loss due to structures or land level changes. Additional Comments - The loss of flood storage volume may seem negligible. However, the loss of flood storage volume from multiple developments can potentially lead to cumulative loses which are significant. All structures proposed within the design flood extent will require compensation for the submerged elements. A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-007.	**Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]** has been produced for the Scheme and considers risk both to, and arising from, the Solar PV Site and the Grid Connection Corridor. As part of **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]**, mitigation is proposed to manage the potential impacts of flood risk so that the development does not increase or exacerbate flood risk to others. Solar PV Panels have been located in accordance with the Sequential Test to avoid areas of high fluvial flood risk and raised to a sufficient height to avoid floodwater. Field Stations have also been sequentially located to avoid high fluvial flood risk areas with five Field Stations raised to a sufficient height to avoid floodwater. While some Solar PV Panels and Field Stations are located within Flood Zone 3, the BESS Area and On-Site Substation will be located outside of Flood Zone 3. This mitigation has been informed by site-specific hydraulic modelling which takes into account any increases in flooding due to climate change expected during the lifetime of the development. The only elements of the Scheme that have the potential to displace flood waters are some of the Solar PV Mounting Structures and five Field Stations. Paragraph 7.2.1 of V**olume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]** confirms that only a small number of Solar PV Mounting Structures will be located within the 1% Annual Exceedance

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	Probability (AEP) plus 38% climate change extent within Fields SE3 and SW5. The cumulative cross-sectional area of the legs of the Solar PV Mounting Structures within the modelled flood extent during the 1% AEP + 38% climate change event is approximately 2.6 m^2 which results in a negligible loss of floodplain storage of approximately 1.3 m^3. In Field SE3, concrete block footings for the Solar PV Mounting Structures may be required for archaeological mitigation. The cumulative cross-sectional area of the block footings within the modelled flood extent during the 1% AEP + 38% climate change event is approximately 26 m^2 which results in a negligible loss of floodplain storage of approximately 13 m^3. Floodplain compensation will be provided to account for loss of floodplain volume where permanent Scheme infrastructure (comprising Solar PV Mounting Structures and Field Stations) are located within the Credible Maximum Scenario flood extent. This is secured in the Framework CEMP which has been updated for Deadline 1.
Topic - Clear span bridges and soffit level Document Reference - ES 2.7.3, 9.8.48, FRA 7.2.2, FRA 7.2.3.c, FRA 8.2.4. Issue Reference - EAFR-008 Issue - Risk of blockage from inappropriate ditch crossings. Impact - Increased flood risk and maintenance challenges. Solution - Commit to clear span bridges with soffit levels 300mm above design flood level. Additional Comments - Section 2.7.3, 9.8.48 suggest clear span bridges will be used but the commitment is unclear. Notably, if fluvial flood risk could be affected, then the Environment Agency is a relevant authority too, and should be consulted on the specific type of crossing selected. A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-008.	As noted in Paragraph 7.2.2 of **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]**, open span crossings will be used where new watercourse crossings are required. No new culverts are proposed, however, there are two areas where extensions to existing culverts will be required to allow for access tracks. As outlined in Table 3-3 of the **Framework CEMP [APP-196]**, where a new open span crossing is required, this will be determined based on site specific factors and in consultation with the relevant authority. The Framework CEMP has been updated for Deadline 1 to commit to a 300 mm soffit about the design flood event. Where practicable, the culvert extensions would be installed at the same level as the existing culvert and any improved structure will be set 150 mm below bed level to allow sedimentation and a naturalised bed to form, which will maintain longitudinal connectivity for aquatic fauna. Further detail will be added into the detailed CEMP post consent and at the detailed design stage. The Applicant has provisionally agreed a form of protective provisions for the benefit of the Environment Agency which are included within the **Draft DCO [APP-220]** as Part 5 of Schedule 14. These allow the Environment Agency to have input and sign off on any detailed design which impact any assets managed by the Environment Agency, including watercourses under the Environment Agency's control which are crossed by the Scheme. Requirement 11 of Schedule 2 in the Draft DCO has been updated for Deadline 1 to include a requirement for consultation with the Environment Agency in the discharge of the detailed CEMP. The Applicant considers this appropriately addresses the Environment Agency's request in respect of a requirement.
Topic - Construction compound locations (including temporary, satellite, roving, and cable corridor, etc) Document Reference - ES 2.7.3, 2.7.17, 2.7.19, 2.7.20, 6.6.5, 9.8.17. Issue Reference - EAFR-009 Issue - Uncertainty about compound locations relative to design flood extent. Impact - Compounds within the design flood extent could increase flood risk. Solution - Where possible locate all compounds outside of the 1 in 100- year flood event (using the site-specific modelling). Compounds must not be placed within Flood Zone 3b. Additional Comments - It seems that the proposed construction compound locations could be outside of the 2032 design event flood extent (with appropriate consideration or relevant climate change uplifts for 2032). Please provide maps demonstrating this for our consideration. Note that the locations proposed are indicative, but they ideally should be outside of the 2032 design flood extent where possible. We note that a sequential approach has been applied. The Applicant must ensure that there are no	Paragraph 8.2.2 of **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]** confirms that all temporary construction compounds within the Solar PV Site will be located outside of the 1% AEP plus climate change design flood event and, therefore, there will be no loss of floodplain storage. Along the Grid Connection Corridor, the northern most temporary construction compound is located outside of Flood Zone 2 and 3 and, whilst the southern most temporary construction compound is located within the Lower Don 1% AEP + 50% climate change flood extent. All temporary construction compounds will be located outside of Flood Zone 3b. Volume III, Appendix 9-3: Flood Risk Assessment is in the process of being updated for Deadline 2 to confirm the location of all temporary construction compound and include examples of flood risk mitigation measures that will be implemented. Maps contained within Volume III, Appendix 9-3: Flood Risk Assessment will also be updated for Deadline 2 to show the proposed locations of all construction compounds. The Framework CEMP has been updated for Deadline 1 to include a commitment to locating all construction compounds outside the 3.3% AEP flood extent (i.e. Flood Zone 3b).

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compounds within Flood Zone 3b and that there is no loss of floodplain storage from the functional floodplain (similarly for materials / spoil storage). A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-009.	The Applicant notes the Environment Agency's request to include a requirement regarding this issue in the **Draft DCO [APP-220]** however the locations of the construction compounds will be provided in the detailed CEMP prepared post consent and must be substantially in accordance with the **Framework CEMP [APP-196]**. The Environment Agency will have the opportunity to comment on the detailed CEMP before it's approval, as secured by Requirements 11 and 18 of Schedule 2 in the **Draft DCO [APP-220]**.
Topic - Trenchless crossing (e.g., HDD) locations, FRA Table 3-4 Document Reference - ES 2.7.30, 2.7.31, Figure 2-4, 9.4.19, 9.8.26, 9.8.27, 9.9.37. Issue Reference - EAFR-010 Issue - The precise locations of HDD are to be determined at the detailed design stage. Impact Altered flood risk assessments. Solution - Consult the Environment Agency for approval at the detailed design stage. We will require technical drawings of the proposed crossings. Additional Comments A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-010.	The Applicant has provisionally agreed a form of protective provisions for the benefit of the Environment Agency which are included within the **Draft DCO [APP-220]** as Part 5 of Schedule 14. These include requirements for the Applicant to engage with and gain approval from the Environment Agency where it undertakes any works beneath main rivers or other drainage works within the Environment Agency's control. The Applicant has separate protective provisions with relevant drainage authorities to gain similar consents in respect of works beneath ordinary watercourses within their control. The Applicant considers these protective provisions, as well as the controls within the **Framework CEMP [APP-196]** for HDD, to which the Applicant is proposing to include the Environment Agency as a consultee for under Requirement 11 of the **Draft DCO [APP-220]** to provide sufficient opportunity for the Environment Agency to comment on the final locations of HDD and any impacts these may have on flooding or watercourses.
Topic - CEMP Document Reference - ES 2.7.60, 2.7.61, 5.5.8, 9.8.23, 9.8.30, FRA 6.2.4, FRA Table 6-2. Issue Reference - EAFR-011 Issue - The management of construction phase flood risks is heavily dependent on an appropriate CEMP. Impact - At this stage the Applicant can only provide a Framework CEMP, and the proposal is still developing which implies some uncertainty in the proposal. Solution - The detailed CEMP(s) should be signed off by us and we may request additional considerations outside of the Framework CEMP as the proposal develops. Additional Comments - The Framework CEMP should cite specific mitigation commitments where possible. Section 9.8.23 has cited examples of measures which could be implemented but we require a formal commitment to measures to ensure that flood risk is not adversely affected. Works being limited to drier months as suggested within 9.8.30 should be stated within the Framework CEMP. A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-011.	Requirement 11 of Schedule 2 in the **Draft DCO [APP-220]** requires the Applicant to submit for approval by City of Doncaster Council as relevant planning authority a detailed CEMP prior to construction commencing. The detailed CEMP must be substantially in accordance with the **Framework CEMP [APP-196]** and include formal commitments to flood risk mitigation measures. This is a standard approach to management plans included in all made DCOs, which ensures the minor changes can be made to management plans where they need to be tweaked to align with final detailed design. It is noted that given this requirement, the detailed CEMP cannot reflect entirely new substantive matters or substantially depart from the content of the **Framework CEMP [APP-196]**. The Applicant notes that the pre-application and Examination stages is the time at which the Environment Agency should provide the majority of its substantive comments on the CEMP (and other management plans) and is open to discussing these further with the Environment Agency during these stages. The reference to works being limited to drier months in Paragraph 9.8.30 of **Volume I, Chapter 9: Water Environment [APP-061]** refers to those associated with intrusive crossings. The Applicant can only commit to this where practicable so does not propose to update the **Framework CEMP [APP-196]** with this commitment. The Applicant notes the Environment Agency's request to include a requirement regarding this issue in the **Draft DCO [APP-220]**. Requirement 11 of Schedule 2 in the **Draft DCO [APP-220]** has been updated for Deadline 1 to include a requirement for consultation by City of Doncaster Council with the Environment Agency in the discharge of the detailed CEMP.
Topic - Construction phase timing Document Reference - ES 5.6.2. Issue Reference - EAFR-012 Issue - Extended construction timelines may invalidate flood risk assessments. Impact - Increased flood risks from climate change beyond assessed levels. Solution - Commit to a reasonable construction phase window.	**Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]** is based upon the stated assumptions in terms of construction and operation and maintenance phases of the Scheme and is considered a worst-case scenario. The assessment has used a conservative allowance for climate change (2080's higher central) for both the construction and operation phases (as detailed in Paragraph 3.4.4 of **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]**) and should remain robust should the construction phase be extended. The Applicant further notes that Requirement 1 of Schedule 2 in the **Draft DCO [APP-220]** does ensure that work on the Scheme must begin within five years of the consent being granted, which places a general restriction to ensure that construction could not commence later than

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Additional Comments - The Applicant has stated that: "Within the ES, construction is assessed as being 2028 to 2030. If the construction timeframe is extended or pushed back beyond the dates assessed within this Environmental Statement, the conclusions of the impact assessment remain valid." A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-012.	2031 (presuming consent is granted in 2026, per the examination and decision timescales under the Planning Act 2008). The Applicant notes the Environment Agency's request to include a requirement regarding this issue in the **Draft DCO [APP-220],** however, the Applicant does not consider this to be necessary, given the assessment above, and the existing control on construction commencement in Requirement 1 of Schedule 2 in the **Draft DCO [APP-220]**.
Topic - Inspections / surveys Document Reference - ES 9.4.1, 9.8.11. Issue Reference - EAFR-013 Issue - Investigations into flood asset geometry and buried elements are required. Impact - Unknown conditions of flood assets could exacerbate risks. Solution - Include as-built drawings and asset surveys in assessments. Additional Comments - The Applicant should consider as-built drawings and may need to carry out an investigation to determine the flood asset geometry and whether buried elements are present. This is particularly relevant in the case of the Thorpe Marsh flood storage area embankments and the Thorpe Marsh Drain (also known as the EA Beck) flood assets. A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-013.	The potential impact to the Thorpe Marsh WSA has been considered in **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]**. However, the Applicant is in the process of updating this document to provide further clarity regarding the assessment of potential impacts to the Thorpe Marsh WSA presented by the Grid Connection Cables and the mitigation integrated into the Scheme design. This update will not change the findings of the assessment. The updates to Volume III, Appendix 9-3: Flood Risk Assessment will be submitted for Deadline 2 of Examination. The Applicant notes the Environment Agency's request to include a requirement regarding this issue in the **Draft DCO [APP-220]**, however, the protective provisions in Schedule 14 Part 5 of the **Draft DCO [APP-220]** provide appropriate protection of Environment Agency's assets, including the Thorpe Marsh WSA. The Framework CEMP has been updated for Deadline 1 to confirm that the depth and method of construction around the Thorpe Marsh WSA will be identified through liaison with the Environment Agency and that HDD will be used at a sufficient depth to avoid compromising the structural integrity of the WSA.
Topic - Cables within an existing vehicular crossing Document Reference ES 9.8.6. Issue Reference - EAFR-014 Issue - Cables could complicate future crossing replacement / maintenance. Impact - Increasing the cost of crossing replacements as it requires the diversion of utilities and potential maintenance issues Solution - Ensure there is sufficient residual life within the crossing to be retained by carrying out a survey of its condition. Ensure all components are removed as part of the decommissioning phase - this should be stipulated within the Framework DEMP. Additional Comments - A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-014.	The Applicant will ensure existing bridge crossings of the Internal Drainage Board (IDB) south tributary to Fleet Drain (Field NW7 to NW8), Fenwick Common Drain (Field SW1 to SW3), Ell Wood and Fenwick Grange Drain (southwest of Field SW8) are appropriate for the installation of the Grid Connection Cables. As detailed in **Volume I, Chapter 2: The Scheme [APP-054]** the mode of decommissioning the Grid Connection Cables would be dependent upon government policy and good practice at that time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Therefore, the Applicant does not currently propose to remove the Grid Connection Cables, including at these crossings. However, this will be confirmed closer to the time of decommissioning and remain subject to final agreement with the relevant local planning authority, in accordance with Requirement 18 of Schedule 2 in the **Draft DCO [APP-220],** as detailed in Paragraph 1.1.10 of the **Framework DEMP [APP-198]**.The Applicant notes the Environment Agency's request to include a requirement regarding this issue in the **Draft DCO [APP-220]**. However, the Applicant does not consider this to be necessary, given the assessment above, and the existing control on requiring decommissioning to be managed in accordance with the **Framework DEMP [APP-198]** per Requirement 18 of Schedule 2 in the **Draft DCO [APP-220]**.
Topic - Flood Zone 3a and 3b Document Reference - ES 9.7.67, Table 9-16, FRA ES7, FRA ES14, FRA 5.2.8, FRA 10.1.2. Issue Reference EAFR-015 Issue - Unclear intersections of proposal with Flood Zones 3a and 3b. Impact - Unknown impacts on flood risk from structures (temporary works, compounds, or permanent structures) within Flood Zone 3. Solution - Provide maps showing proposal in context of Flood Zones 3a and 3b.	**Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]** confirms that no permanent elements of the Scheme will be located within Flood Zone 3b. As the Grid Connection Cables will be buried, these will not be impacted by above ground fluvial sources. The Applicant is updating the figures presented in **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]** for Deadline 2 to clearly present the interaction regarding elements of the Scheme with Flood Zone 3a and 3b.

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Additional Comments - Notably FRA 5.2.8 suggests that no elements of the solar PV site will be within Flood Zone 3b. We require clarity about the cable corridor.	
Topic - Culverts Document Reference - ES 9.8.49. Issue Reference - EAFR-016 Issue - Proposed 2m culvert extension poses inspection and maintenance challenges. Impact - Higher flood risk compared to clear span bridges. Solution - Avoid extending culverts, replace with a clear span bridge. Additional Comments - Hydraulic modelling required for any culvert modifications.	Where the two culverts are being extended and one removed as part of the Scheme, the Applicant is undertaking hand calculations which will be presented in updates to **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]** for Deadline 2 to demonstrate that there are no adverse impacts from these elements of the Scheme. This approach was discussed and agreed with the Environment Agency in meetings held on 28 February 2025 and 22 April 2025. This is considered proportionate given the size of the watercourses and the changes proposed to the culverts as part of the Scheme.
Topic - Fencing and flood flow routes Document Reference - Table 2-1: Design Parameters, 2.7.6, 2.7.10, 2.7.11, 2.7.12. Issue Reference - EAFR-017 Issue - Unclear if fencing will inhibit flood flow routes. Impact - Impeded flood flows, potentially exacerbating flood risks. Solution - Ensure fencing does not obstruct flood flow. Additional Comments - Fencing (e.g., security, perimeter and internal fencing) must not inhibit flood flow routes. The Applicant should clarify that this is the case.	The perimeter and stock proof fencing proposed within flooded areas will comprise fence posts with chain link/wire which does not impede flood flows.
Topic - String inverter level Document Reference - Table 2-1: Design Parameters, Plate 2-3, FRA ES8 Issue Reference - EAFR-018 Issue - String inverters are sensitive to flooding. Impact - Operability of site affected during design flood event. Solution - Raise inverters 300mm above design flood level.	Due to the location of some Solar PV Panels in Flood Zone 2 and Flood Zone 3, the maximum height of string inverters is currently expected to be up to 2m Above Ground Level (AGL). These string inverters would either be mounted parallel to the Solar PV Panels or, more likely, at the end of each frame and would not affect the operability of the Scheme during a flood event. This is secured in the **Outline Design Parameters Statement [APP-193]** at page 6. Requirement 4 of the **draft DCO [APP-220]** provides that the detailed design submitted must accord with the **Outline Design Parameters Statement [APP-193]**, ensuring these parameters are secured.
Topic - Solar PV freeboard clarity Document Reference - ES 9.8.34, 9.8.35, FRA 5.2.10. Issue Reference - EAFR-019 Issue - The Applicant has suggested raising solar panels 400mm above the Credible Maximum Scenario and 300mm above the design flood event. Impact - The Credible Maximum Scenario is likely to more extreme in all cases. Solution - We welcome the commitment to 400mm above the Credible Maximum Scenario.	Where Solar PV Panels are located within the Credible Maximum Scenario flood extent, the lower edge will be raised 400mm above the flood level associated with this event. The Applicant does not propose to apply a 400mm freeboard to all Solar PV Panels. Volume III, Appendix 9-3: Flood Risk Assessment is being updated for Deadline 2 to include mapping to demonstrate where Solar PV Panels will be raised to 400 mm above the Credible Maximum Scenario flood extent. This is secured in the **Outline Design Parameters Statement [APP-193]** at page 5. Requirement 4 of the **Draft DCO [APP-220]** provides that the detailed design submitted must accord with the outline design parameters statement, ensuring these parameters are secured.
Topic - Receptor importance and magnitude criteria Document Reference - Table 9-1, 9.5.24, Table 9-2, Table 9-17. Issue Reference - EAFR-020 Issue - Land use may change within the study area. Impact - Increase in flood risk during the lifetime of the development. Solution - Check for any land allocations within the SFRA.	The cumulative assessment undertaken does not indicate any impacts from the Scheme in combination with other developments at this time as any potential increases in flood risk from the Scheme would be mitigated, as demonstrated within **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]**. Whilst other future developments within the Study Area have the potential to impact flood risk, each should include their own mitigation measures to minimise impacts to third party sites in line with planning policy. This would likely include a site-specific FRA, drainage strategy and, where required, a CEMP.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Additional Comments - Receptor sensitivity using the vulnerability classification is relevant today, but there could be development to an area offsite in future. Any increase in flood risk would not be considered acceptable.	
Topic - Temporary works Document Reference - ES 9.4.15. Issue Reference - EAFR-021 Issue - List of temporary works with flood risk impacts not provided. Impact - Unclear potential for adverse effects on flood risk. Solution - Provide comprehensive list of temporary works and impacts.	Paragraph 2.7.3 of **Volume I, Chapter 2: The Scheme [APP-054]** provides a full list of temporary works to be undertaken as part of the construction phase of the Scheme. Section 9.9 in **Volume I, Chapter 9: Water Environment [APP-061]** outlines the impacts of the Scheme on flood risk and includes mitigation measures where required. The Applicant has fully assessed the impact of temporary works in **Volume I, Chapter 9: Water Environment [APP-061]**.
Topic - Temporary drainage system Document Reference - ES 9.9.44 Issue Reference - EAFR-022 Issue - Process for determining need for temporary drainage unclear. Impact - Potential unmanaged runoff during construction. Solution - Clarify decision-making process for temporary drainage system.	The Applicant will develop a temporary drainage system to prevent runoff contaminated with fine particulates from entering surface water drains without treatment. This will be implemented, where required, following the identification of all land drains and water features on and near the Order limits to ensure these are adequately protected. Table 3-4 (page 35-45) of the **Framework CEMP [APP-196]** outlines all measures to be implemented to manage surface water runoff during the construction phase of the Scheme. Further detail will be added into the detailed CEMP post consent and at the detailed design stage. Requirement 11 of Schedule 2 in the **Draft DCO [APP-220]** has been updated for Deadline 1 to include a requirement for consultation with the Environment Agency in the discharge of the detailed CEMP.
Topic - Flood risk: Sea level rise resulting from climate change Document Reference - Volume 1 Chapter 6: Climate Change document reference EN010152/APP/6.1 and Volume 1 Chapter 9: Water Environment document reference EN010152/APP/6.1 Issue Reference - EAFM-01 Issue - Section 9.7.128 Credible Maximum Scenario page 9-68. The assessment of changes in sea level because of climate change has been scoped out as the scheme is not located in an area that is susceptible to sea level rise. The River Don is a tidally influenced watercourse and therefore is likely to be impacted by rising sea levels Impact - It is not clear why the impact of climate change on sea level has been scoped out of the assessment. This should be included or evidence provided to justify scoping out the impact of rising sea levels on the River Don. Solution - Further detail should be provided to support the case for scoping the effect of rising sea levels out of the assessment. Please see the additional comments below which provide some useful detail with regards to tidal water levels on the River Don because of rising sea levels. Additional Comments - Inspection of the outputs from the Humber Extreme Water Levels (HEWL) project (Jacobs, 2020) at the outfall of the River Went into the River Don (node DON00_10056) shows a present day 5% (1 in 20) annual exceedance probability water level of 6.03 mAOD. For the H++ scenario for 2071 this increases to 6.26 mAOD and for the H++ scenario for 2121 this increases to 6.27 mAOD. For the 0.5% (1 in 200) annual exceedance probability scenario a present-day water level of 6.23 mAOD is observed. For the H++ scenario for 2071 this level is 6.27 mAOD, and for 2121 this increases to 6.28 mAOD. It is noted that a sensitivity test has been included within the hydraulic model which adopts a fixed water level of 6.28 mAOD at the downstream boundary (WEN_BASELINE_0100YR_60CC_015b_S_EHWL). This reflects the 0.1% (1 in 1000) AEP H++ water level from the Humber Extreme Water levels (HEWL) project at node DON00_10056. This scenario should be referenced when providing the supporting detail as to why the impacts of climate change on sea level rise have not been assessed/is not relevant for the area of interest.	The Order limits is defended from tidal flooding from the tidal River Don, as demonstrated within Section 5.3 of **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159].** The main impact on the Scheme due to sea level rise from climate change is therefore attributable to locking of the River Went outfall, and associated impact upon fluvial flood risk from the River Went. As part of the hydraulic modelling undertaken for the Scheme, a number of model runs were undertaken to explore the impact of locking of the River Went outfall, including sensitivity analysis and simulation of the Credible Maximum Scenario. Sensitivity analysis documented in Section 6.4 of **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]** applied downstream boundary levels on the tidal Don of 50% AEP and 2% AEP, whilst the design model applied a 5% AEP level. Sensitivity testing showed that varying levels on the tidal River Don impacted flooding on the River Went, although this was most pronounced downstream of the Order limits close to the River Went outfall. Changes in flood extent and depth were limited at the location of the Order limits, despite that the River Went outfall was fully locked (i.e. no outflow to the tidal River Don) in the 2% AEP. The Credible Maximum Scenario applied a level for the River Don from the 2% AEP event, which meant that the River Went outfall was locked throughout the simulation. Therefore, this represents an upper envelope of the potential impact of rising tidal levels due to future climate change. This has been discussed and agreed with the Environment Agency. The Applicant considers that the assessment has adequately considered changes in tidal levels due to climate change in **Volume I, Chapter 9: Water Environment [APP-061]**.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Topic - Flood risk: Freeboard above the design flood Document Reference - Volume 1 Chapter 9: Water Environment document reference EN010152/APP/6.1 Issue Reference - EAFM-02 Issue - Section 9.8.34 and 9.8.35 page 9-82. This section describes the available freeboard for the Solar PV panels in the design flood (1% (1 in 100) AEP plus higher central climate change) and the upper climate change scenarios. A 300mm freeboard is suggested for the design flood which is considered reasonable. Section 9.8.35 also describes how Solar PV Panels located within the Credible Maximum Scenario flood extent will be raised 400mm above the flood level associated with this event. This is considered reasonable although solar panels which fall within the design flood extent will also fall within the credible maximum flood extent. On this basis the freeboard for all solar panels within the design flood extent would likely be 400mm or greater Impact - There are contradictory statements within the text which require clarifying. Solution - Please review the text in section 9.8.34 and 9.8.35 and provide clarity regarding the freeboard above the design flood and credible maximum scenarios.	Where Solar PV Panels are located within the Credible Maximum Scenario flood extent, the lower edge will be raised 400 mm above the flood level associated with this event. The Applicant does not propose to apply a 400 mm freeboard to all Solar PV Panels. Volume III, Appendix 9-3: Flood Risk Assessment is being updated for Deadline 2 to include mapping to demonstrate where Solar PV Panels will be raised to 400 mm above the Credible Maximum Scenario flood extent. This is secured in the **Outline Design Parameters Statement [APP-193]** at page 5. Requirement 4 of the **Draft DCO [APP-220]** provides that the detailed design submitted must accord with the outline design parameters statement, ensuring these parameters are secured.
Topic - Flood risk: Culvert extensions and removals Document Reference - Volume 1 Chapter 9: Water Environment document reference EN010152/APP/6.1 Issue Reference - EAFM-03 Issue - Section 9.8.49 and 9.8.50 Culvert extensions and removals page 9-85. This section describes how a culvert over the north tributary to the Fleet Drain between field areas NE7 and NE8 (east 461165, north 416900) may be extended by up to 2 metres. In addition, a further culvert extension may be required for the access track between field NW8 and SW1/SW2 (east 460025, north 416120). Finally, a section of culvert along the Fleet Drain east of Fenwick Hall and west of field SE3 (461120, 416270) will be removed. No information is presented with regards to flood risk in relation to these culvert extensions and removals, particularly with regards to the impact on flood risk to third parties Impact - The impact on flood risk from the scheme could be underestimated and the proposed crossings could be designed inappropriately. Solution - Where culvert extensions and removals are proposed these should be designed such that they do not increase flood risk elsewhere. Additional Comments - In terms of the impact of crossing extensions and removals, typically, this would be determined by undertaking hydraulic modelling or referring to existing detailed hydraulic modelling data (where available). For the removal of the crossing on the Fleet Drain east of Fenwick Hall it would be possible to quantify the impact of this by using the hydraulic modelling developed for the scheme as this culvert is included within the hydraulic model (conduit unit FLE_01350cd). For the proposed crossing extension for the culvert over the tributary of the Fleet Drain between field areas NE7 and NE8 we do not hold any hydraulic modelling for this watercourse. We appreciate this watercourse is small however evidence should be provided that this extension of 2 metres would not increase flood risk elsewhere. This could be achieved by either producing a localised 1-dimensional hydraulic model or by undertaking some simple hand calculations which demonstrate that the 2-metre extension would not impact the culvert head losses to any appreciable amount.	Where the two culverts are being extended and one removed as part of the Scheme, the Applicant is undertaking hand calculations which will be presented in updates to **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]** for Deadline 2 to demonstrate that there are no adverse impacts from these elements of the Scheme. This approach was discussed and agreed with the Environment Agency in meetings held on 28 February 2025 and 22 April 2025. This is considered proportionate given the size of the watercourses and the changes proposed to the culverts as part of the Scheme.
Topic - Flood risk: Flood risk to the BESS and substation Document Reference - Volume 1 Chapter 9: Water Environment document reference EN010152/APP/6.1 and Volume 3 Appendix 9-3: Flood Risk Assessment Issue Reference - EAFM-04	The risk of flooding to the Order limits from main rivers and ordinary watercourses has been quantified through hydraulic modelling and the findings are presented in **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]**. Flood risk from smaller drainage channels/ditches has been assessed by proxy using the Environment Agency surface water

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Issue - The BESS and substation are in Flood Zone 1. The Ell Wood and Fenwick Grange Drain runs in close proximity just to the south of the BESS. There are no mapped Flood Zone extents for this watercourse given the small size of its respective catchment. The flood risk to the BESS and substation from the Ell Wood common drain is not described in the Water Environment Chapter or Flood Risk Assessment. Impact - Flood risk to the BESS and substation could be underestimated as well as the impacts of the BESS and substation on flood risk Solution - Whilst we acknowledge that the BESS and substation are within Flood Zone 1 further detail regarding flood risk to the BESS and the substation from the Ell Wood Common drain should be included within the Water Environment Chapter and Flood Risk Assessment Additional Comments - The Risk of Flooding from Surface Water mapping is a useful starting point for establishing flood risk to the BESS and substation although please bear in mind that this does not consider the effects of climate change. Furthermore, the production of the new Risk of Flooding from Rivers and Sea dataset at the end of January 2025 may provide some useful information on flood risk considering the effects of climate change. Further information is available online at: Updates to national flood and coastal erosion risk information - GOV.UK. If a reliance is being placed on existing flood risk products such as the Risk of Flooding from Surface Water (RoFSW) mapping to inform fluvial flood risk to the BESS and substation then clear justification should be provided as to why this is a suitable proxy for representing fluvial flood risk taking into consideration the effects of climate change.	flood map, as detailed within Section 5.5 of **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]**. Flood risk to the BESS Area and On-Site Substation from Ell Wood Common drain will be mitigated through the measures detailed in V**olume III, Appendix 9-4: Framework Drainage Strategy [APP-160]**. This is noted in Section 5.5 and Section 8.5 of **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]**. The Applicant has reviewed the Risk of Flooding from Rivers and Sea dataset published in January 2025 which shows an increased risk to the BESS Area, however, this would be mitigated through the measures detailed in **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]**. Any Field Stations located within surface water flood extents (located in Fields SW6, SW3, SW9, SW10, SW4, SW8, NE8, NE7, NE9, NW6) will be raised 300 mm above the surface water flood level.
Topic - Flood risk: Hydraulic modelling software version Document Reference - Volume 3 Appendix 9.3 Flood Risk Assessment Annexes Document Reference EN010152/APP/6.3. Annex A Hydraulic Modelling Report Issue Reference - EAFM-05 Issue - Section 4.1.3 page 11. The hydraulic modelling report notes that Flood Modeller version 7 and TUFLOW versions 2023- 03-AC have been used. A review of the Tuflow Log Files (.tlf) suggests that TUFLOW version 2023-03-AA has been used rather than 2023-03-AC. Whilst both versions are considered appropriate there is inconsistency between the reporting and the model files. Impact - There is inconsistency between the model report and the supplied hydraulic model files with regards to the software versions used. Whilst this will not affect the model results the model report should be updated for consistency Solution - Please update the Tuflow version referenced in the model report to 2023-03-AA to ensure consistency with the supplied Tuflow Log files.	The Applicant notes the minor error in **Volume III, Appendix 9-3: Flood Risk Assessment Annexes [APP-159]** which does not reflect the modelling software used in the hydraulic modelling completed for the Scheme. The Applicant is in the process of updating Annex A of **Volume III, Appendix 9-3: Flood Risk Assessment Annexes [APP-159]** for Deadline 2 to reflect the correct model software version used.
Fisheries, Biodiversity and Geomorphology Topic - Invasive Non-Native Species (INNS) Document Reference - Framework Construction Environmental Management Plan Table 3.3 Issue Reference - EAFBG-001 Issue - Table 3.3 states "A Biosecurity Plan prior to construction (secured through DCO Requirement 11 / 18) will set out procedures to ensure that no invasive species are brought onto or exported out of the Order Limits". However, this proposed requirement is absent in the draft DCO. Impact - Without the inclusion of this requirement the risks around INNS will not be adequately managed. Solution - We require the inclusion of a DCO Requirement to be included in relation to INNS and will work with the developer to agree this.	The Biosecurity Plan referenced in the **Framework CEMP [APP-196]** is secured by Requirements 11 and 18 of Schedule 2 in the **Draft DCO [APP-220],** as it is secured via the CEMP and DEMP. This will set out procedures to ensure that no INNS are brought onto or exported out of the Order limits (e.g. Wildlife and Countryside Act 1981 ((as amended) Schedule 9 species). In the event that any future infestations of INNS are identified prior to and or during the development process, exclusion zones will be established around them, and a suitably qualified ecologist contacted for advice as required. Site/species specific method statements (or similar) will be prepared as required. The Environment Agency will have the opportunity to comment on the Biosecurity Plan before it's approval. The Applicant has updated Requirements 11 and 18 of Schedule 2 in the Draft DCO for Deadline 1 to secure the Environment Agency as a consultee for the CEMP and DEMP.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Additional Comments - A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-015.	
Topic - Wetland Habitat Management Document Reference - Framework Landscape and Ecological Management Plan. Sections 5.2.11 & 5.3.65 Issue Reference - EAFBG-002 Issue - Proposed minimal management of wet grassland within the riparian corridor Impact - Potential reduction in wetland habitat quality Solution - The Applicant should commit to preparing and putting a wetland habitat management plan in place. Additional Comments - Woody vegetation may need to be managed to prevent too many trees (such as birch) from colonising the site and drying out the habitat. This could pave the way for succession and reduce the quality of wetland habitat.	Details regarding the establishment maintenance and long-term management of wet grassland is provided in Paragraph 5.3.63 to 5.3.65 of the **Framework LEMP [APP-203].** The Applicant has updated this document to confirm that a wetland habitat management measures will be included within the detailed LEMP produced post consent. This is secured as part of Requirement 6 of Schedule 2 in the **Draft DCO [APP-220]**.
Topic - Culverts Document Reference - Environmental Statement; Chapter 2; Section 2.7; paragraph 2.7.3 6.1 – Chapter 2 – 2.7.3 vi also 7.7 – Framework CEMP – Table 3.4 [Access track crossings] and 6.3 Appendix 9.2 WFD Assessment Issue Reference EAFBG-003 Issue - All culverts to convey watercourse are proposed to be set 150mm below bed. Impact - Culverting interferes with natural processes of watercourses. It can exacerbate the risk of flooding and increase maintenance cost and complexity. It can also destroy wildlife habitats, hinder fish passage, reduce amenity value, interrupt the continuity of the linear corridor of a watercourse. Culverting beneath the bed may still interact with the hyporheic zone and impact on important dynamics for aquatic invertebrates. It can also affect channel stability, including encouraging scour which may result in exposing of the bed of the culvert. Solution - Culverting of watercourses should be avoided in line with Environment Agency policy. If no other options are available, then we would favour the culverts to not interact with the watercourse bed at all, including a minimum depth of 300mm to encourage natural bed processes and reduce the possibility of channel scour downstream of the invert. Additional Comments - Crossings can be designed in a way that does not affect the bed of the river, therefore culverts buried beneath watercourse bed are not necessary.	As noted in the Applicant's response to EAFR-008, no new culverts are proposed, however, there are two areas where extensions to existing culverts may be required to allow for access tracks. Extensions to the existing culverts will be designed to maintain connectivity along the watercourse for aquatic species and riparian mammals. Both culvert extensions would be installed at the same level as the existing culvert and will maintain longitudinal connectivity for aquatic fauna. The Applicant has provisionally agreed a form of protective provisions for the benefit of the Environment Agency which are included within the **Draft DCO [APP-220]** as Part 5 of Schedule 14. These allow the Environment Agency to have input and sign off on any detailed design which impact any assets managed by the Environment Agency, including watercourses under the Environment Agency's control which are crossed by the Scheme. As secured in Table 3-4 (page 56) of the **Framework CEMP [APP-196]**, one section of a culvert along Fleet Drain will be removed as part of the Scheme.
Topic - Mitigation for Fish Document Reference - 7.7 – Framework Construction Environmental Management Plan Issue Reference - EAFBG-004 Issue - Insufficient detail on mitigation for fish. Impact - Open cut trenching across waterbodies could have negative impact on fish without sufficient mitigation being in place. Solution - The Framework CEMP should set the standards and guidelines for contractors to follow when designing method statements. The recommendations for fish outlined in paragraph 5.1.7 of Volume III, Appendix 8-6: Aquatic Ecology Report should be detailed in the Framework CEMP.	The Applicant has updated the Framework CEMP for Deadline 1 to include reference to the standard measures for avoiding potential impacts on watercourses and fish during construction outlined in **Volume I, Chapter 8: Ecology [APP-060]** and Paragraph 5.1.7 of **Volume III, Appendix 8-6: Aquatic Ecology Report [APP-151]**. Specific wording to secure the protection to eel and fish from entrainment when over pumping has also been included in the updated Framework CEMP.
Topic - Electro-Magnetic Fields (EMFs) Document Reference - Environmental Statement; Chapter 8; Table 8-12 Issue Reference - EAFBG-005	A risk assessment has been completed in relation to EMF. The risk assessment concludes that the probability of adverse effects of EMF from cables buried beneath watercourses on fish is

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Issue - Insufficient reasoning behind 5m depth of cables as mitigation for magnetic fields and impacts on fish. Impact - Magnetic fields emitted from high voltage cables can have behavioural impacts and impacts on fish egg development. Solution - In the absence of conclusive evidence of no impact, we adopt the precautionary principle and require that appropriate measures are put in place by the developer, so that no detectable Electro-Magnetic Fields (EMFs) result from the installation of underground cables within the wetted area of an inland waterbody. Whilst we support an increase in depth as mitigation, details on the reasoning behind 5m depth of cables should be provided, with evidence that magnetic fields at this depth will not be detectable from the cable within the wetted area. If sufficient evidence cannot be presented, then it is likely that a requirement for monitoring of EMF where cables are laid under watercourses will be required	extremely low and will be negligible in the wider context of the watercourses. Any effect is therefore considered to be not significant. Mitigation in the form of burying the cable a minimum of 5 m below the lowest point of the riverbed of Mill Dike, Wrancarr Drain, Engine Dike and Thorpe Marsh Drain is included within the **Outline Design Parameters Statement [APP-193]** which is secured by Requirement 4 of Schedule 2 in the **Draft DCO [APP-220]**.This proposed approach has been proposed within other solar DCO applications examined by the Planning Inspectorate, including East Yorkshire Solar Farm and Tillbridge Solar Project. The Framework CEMP has been updated for Deadline 1 to confirm that cables will be installed a minimum of 5 m below the lowest point of these watercourses. No further mitigation considered to be required. As agreed with the Environment Agency on the 28 February 2025, EMF monitoring is not considered necessary due to the nature of the watercourses crossed, which do not represent migratory corridors for notable fish species.
Topic - Atlantic salmon Document Reference- Environmental Statement; Chapter 9; Table 9-17 Issue Reference - EAFBG-006 Issue - Atlantic salmon (Salmo salar) have not been listed as present in the River Don. Impact - It may reduce the importance of the River Don if Atlantic salmon are not noted as present. In turn this may reduce the significance of any impact. Solution - Atlantic salmon should be listed as present in the River Don. Whilst not in great numbers, every effort should be made to ensure they are conserved and protected, especially as the UK population is now listed as endangered on the International Union for Conservation of Nature (IUCN) Red List.	It is noted that Atlantic salmon may be present in the River Don in low numbers, however, this species was not recorded in the desk study. This does not change the assessment as the conclusions for other fish species are also relevant to Atlantic salmon, in the low probability that they are present. Therefore, effects to Atlantic salmon would be negligible in the context of the population likely to be present. The importance of Receptors Table 9-17 in **Volume I, Chapter 9: Water Environment [APP-061]** states that the River Don is a Very High Importance Receptor. This is the highest value which can be attributed for importance. Other protected species are noted within the Don, the omission of Atlantic Salmon in Table 9-17 in **Volume I, Chapter 9: Water Environment [APP-061]** does not result in a lower importance as the River Don is listed as a Very High importance receptor for the assessment. The presence of Atlantic Salmon is noted and assessed in Table 8-8 and Table 8-12 in **Volume I, Chapter 8: Ecology [APP-060]**.
Topic - Bentonite/drilling fluid break Document Reference - 7.7 – Framework CEMP – Table 3.4. Appendix 9.2 WFD Assessment and 6.1-Chapter 9 [9.9.51] Issue Reference - EAFBG-007 Issue - Possible "frac out" of drilling mud (Bentonite clay). Impact - Bentonite, a natural clay, can cause issues in freshwater systems. Although it will not floc in freshwater, as it would in brackish to marine conditions, it can nonetheless It can smother the natural bed sediments of a watercourse should it accidentally enter the channel through subsurface fracturing caused by overpressure of drilling fluid. Depending on the nature of the watercourse and its flow regime, natural processes may not be able to overcome critical sheer stress of the clay, preventing natural transport downstream. Although "frac outs" are a relatively common occurrence, they are usually encountered at the entry/exit locations, due to the lack of overburden pressure. Due to the intended depth of HDD drilling, it is unlikely that a "frac out" would occur under a watercourse, however it remains a possibility. Solution - In addition to the proposed site-specific Hydraulic Fracture Risk Assessments, which would be conducted before drilling commenced, a Bentonite/drilling fluid break out management plan may also be required, to include specifics on remediation methods, including sympathetic clean-up of any spillage. Additional Comments - Effects of potential "frac out" has been screened out of the WFD Assessment due to the proposed site-specific Hydraulic Fracture Risk Assessment.	The **Framework CEMP [APP-196]** includes a requirement for a site-specific hydraulic fracture risk assessment. The Framework CEMP has been updated for Deadline 1 to confirm that this will assess the risk of drill fluid leaking into the watercourse and groundwater during HDD activities. It is confirmed that any bentonite leakage occurs during drilling, the drilling must cease. This would be developed prior to construction following further investigation of specific ground conditions at the crossing locations, and appropriate mitigation developed in line with best construction practice. This will be added into the detailed CEMP post consent to align with the final design prepared at the detailed design stage. Requirement 11 of Schedule 2 in the **Draft DCO [APP-220] has** been updated for Deadline 1 to include a requirement for consultation with the Environment Agency in the discharge of the detailed CEMP, so they can comment on the final controls for frac-out, if necessary.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Groundwater and Contaminated Land Topic - Sensitive receptors – Source Protection Zones Document Reference - ES Vol. I, Chapter 9 Issue Reference - EAGWCL-01 Issue - Areas of SPZ3 have not been considered within the submitted documents. Impact - ES Vol. I, Chapter 9.7.29 notes the SPZ3 in the north, but not SPZ3 in the south. Within 6.3 App. 14-4, Section 8.6.7, Table 8-3, and all subsequent relevant sections, the Source Protection Zone is not listed as a receptor. Therefore, the risks to the Source Protection Zones may be overlooked. Solution - All source protection zones must be identified as receptors within the Preliminary Risk Assessment. Additional Comments - In 6.3 App. 9-4 Drainage, Section 1.4.2, the groundwater vulnerability comments do not mention the SPZ3. This report only considers the substation and BESS, neither of which are proposed to overly the SPZ, however this section describes the Solar PV Site as a whole and we would expect the SPZ to be acknowledged. A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-016	SPZ within the Solar PV Site and Grid Connection Corridor have been considered as part of the assessments in **Volume I, Chapter 9: Water Environment [APP-061], Volume III, Appendix 14-3: Phase 1 PRA – Solar PV Site [APP-183]** and **Volume III, Appendix 14-3: Phase 1 PRA – Grid Connection Corridor [APP-184, APP-185]**. Section 9.7 of **Volume I, Chapter 9: Water Environment [APP-061]** identifies all SPZ within the Order limits as part of the baseline conditions. The Applicant confirms that all SPZ within the Order limits have been considered as part of the groundwater assessment for the Scheme which, whilst not explicitly listed, includes the area of SPZ3 at the southern end of the Grid Connection Corridor. Whilst **Volume III, Appendix 14-3: Phase 1 PRA – Grid Connection Corridor [APP-184, APP-185]** does not explicitly identify SPZ as potential sensitive receptors, the Applicant can confirm that all SPZ within the Order limits have been considered as part of the assessment. The Applicant does not propose to update **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]** as this area of SPZ3 at the north of the Solar PV Site will comprise only Solar PV Panels and Ecology Mitigation Areas. This area of the Scheme is therefore not expected to introduce negative impacts to surface water and groundwater. The mitigation measures provided in Section 3.4 of the **Framework CEMP [APP-196]** address the potential impacts to groundwater and surface water resources. This has been updated for Deadline 1 to explicitly state that the mitigation measures are relevant to SPZ within the Order limits. Further detail will be added into the detailed CEMP post consent to incorporate any final mitigation confirmed at the detailed design stage. The Applicant notes the Environment Agency's request to include a requirement regarding this issue in the **Draft DCO [APP-220]**, however, this is not considered necessary.
Topic - Unsuspected Contamination Document Reference - ES Vol. I, Section 14.4.23 Issue Reference - EAGWCL-02 Issue - The report assumes that the site investigation identifies no gross contamination which requires further investigation or remediation. Impact - Risk to controlled waters Solution - Production of a management plan to assess and remediate unexpected contamination during the construction phase. Additional Comments - A requirement regarding this issue is necessary. Please refer to Appendix 2 – Issue ref. EAREQ-017.	Table 3-13 of the **Framework CEMP [APP-196]** provides actions that would be taken in the event that contamination is identified. This is secured by Requirement 11 of Schedule 2 in the **Draft DCO [APP-220]**. This has been updated for Deadline 1 to include specific steps for remediation to protect construction workers, future site users, water resources, structures and services in the event that contaminated materials are identified. The Applicant notes the Environment Agency's request to include a requirement regarding this issue in the **Draft DCO [APP-220]**, however, this is not considered necessary given the control measures in the **Framework CEMP [APP-196]**.
Topic - HDD Fluid Leakage Document Reference - 7.7 – Framework Construction Environmental Management Plan Issue Reference - EAGWCL-03 Issue - Fluid leakage during HDD. Impact - At least one proposed HDD location is within the sensitive SPZ3 in the south of the connection corridor. Solution - A fluid breakout plan should be produced. Additional Comments - Aquifers and SPZ are not mentioned anywhere in the fCEMP, fOEMP or fDEMP, which gives us concern that they have not been adequately considered for these stages of works.	The **Framework CEMP [APP-196]** includes the requirement for the production of a hydraulic fracture risk assessment which will assess the risk of drill fluid leaking into the watercourse during HDD activities. The Framework CEMP has been updated for Deadline 1 to confirm that this will assess the risk of drill fluid leaking into the watercourse and groundwater during HDD activities. It is confirmed that any bentonite leakage occurs during drilling, the drilling must cease. The Applicant will produce this assessment post consent informed by the detailed design as part of the detailed CEMP secured by Requirement 11 of Schedule 2 in the **Draft DCO [APP-220]**.
BESS Site and Risks from Fire	Uncontrolled site run-off and impact to groundwater has been considered in Table 3-4 of the **Framework CEMP [APP-196].** Section 5.2 of **Volume III, Appendix 9-4: Framework Drainage**

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Topic - Fire suppression design Document Reference - 7.16 Framework Battery Safety Management Plan, Section 2.1.7 to 2.11 Issue Reference - EAGWCL-04 Issue - Omission to mention groundwater or impacts beyond the BESS units themselves in these sections. There is no mention of water storage and capture, including interceptors or similar features. Impact - Potential to pollute surface and groundwaters from contaminated firewater runoff. Solution - Appropriately consider groundwater and impacts beyond the BESS units as well as water storage and capture, including interceptors or similar features.	**Strategy [APP-160]** describes the approach to surface water attenuation and fire water collection. It notes how pollution to surface and groundwater will be prevented and how discharged flows will be controlled. It is noted that the areas where BESS Containers are to be located and fire water is to be stored will be impermeable. Further detail on these considerations is spread throughout **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]**. The Framework CEMP has been updated for Deadline 1 to secure the prevention of chemicals in solution from entering surface water drains without treatment through the implantation of the temporary drainage system. The **Framework BSMP [APP-205]** includes details regarding firewater (Paragraph 3.2.5) and firefighting consequences (Paragraph 3.6.3 and 3.6.4). The proposed firefighting water capture drainage system, full system details will be finalised at the detailed design stage and secured through the detailed BSMP. The **Framework BSMP [APP-205]** provides an overview of these measures. One of the key Scheme Safety Objectives listed in the **Framework BSMP [APP-205]** stipulates "*To ensure that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite*" which is secured by Requirement 5 of Schedule 2 in the **Draft DCO [APP-220].**
Topic - Monitoring systems Document Reference - 7.16 Framework Battery Safety Management Plan, Section 2.1.30 Issue Reference - EAGWCL-05 Issue - Monitoring systems are to shut down the system in the event of abnormal operation (that is, fire), independent of other control systems and equipment. It is unclear if this is automatic shutdown or not, unless this is stipulated in the NFPA 855 reference document which we have not reviewed. Impact - Potential to pollute surface and groundwaters from contaminated firewater runoff. Solution - This should be confirmed in the Framework Battery Safety Management Plan document for completeness Additional Comments - Section 3.1.3 states the battery system and transformers will be automatically electrically isolated. NFCC 2024 (unpublished) guidance specifies that automatic smoke detection should be used. These are related, but not the same.	While **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]** describes the approach to fire water collection, it does not state whether the penstocks used to isolate the area around a burning BESS Container would be automated. The Applicant clarifies that Paragraph 2.1.30 of **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]** is detailing automatic shutdown in line with National Fire Protection Association (NFPA) 855 (2023) Standard for the Installation of Stationary Energy Storage Systems requirements, which is heavily referenced in National Fire Chiefs Council (NFCC) guidance (i.e. in the event of a fire, the battery system and the transformers serving the BESS will be automatically electrically isolated when a fire is detected within a container). The **Framework BSMP [APP-205]** details that smoke, fire, and gas detection will be integrated, and also details other monitoring/alert features which are capable to automatically shut down systems and align fully with NFPA 855 requirements. For example, minimum Building Management System (BMS) control architecture is outlined in Paragraph 2.3.2. Paragraph 3.1.3 is simply clarifying automatic shutdown to inform SYFRS' response strategy.
Topic - Fire suppression controls Document Reference - 7.16 Framework Battery Safety Management Plan, Section 2.1.30 h Issue Reference - EAGWCL-06 Issue - No confirmation of what controls are in place if BESS enclosure design does not integrate automatic fire suppression systems, and a dry pipe sprinkler or spray system is integrated. Impact - Potential to pollute surface and groundwaters. Solution - Confirmation of what controls will be in place if there is no automatic system. Additional Comments - We understand that staffed 24/7 monitoring will be in place. As the current design is not confirmed and this is a framework document, we expect to see an allowance for if water will be used, until such time as the applicant can confirm it will not.	As stated in Paragraph 2.1.7 of the **Framework BSMP [APP-205],** a BESS Container fire suppression system, if integrated by the BESS Original Equipment Manufacturer (OEM), will conform to NFPA 855 guidelines, and the suppression system should be tested to UL 9540A latest standard or significant scale third party testing. The current trend for BESS cabinet systems is not to integrate automatic fire suppression systems and to demonstrate that a worst-case scenario is the safe burn out of a single BESS cabinet without fire brigade intervention, decommissioning is an easier process if stranded energy (live battery modules) risks are removed. In most BESS cabinet designs a dry pipe sprinkler system can be installed for SYFRS to operate if they believe that internal suppression is required during a thermal runaway event. The BESS Area water supply capability factors in additional volume for this potential requirement. Additionally, as per stipulations for automatic water-based fire suppression systems (Paragraph 2.1.30f) "*The suppression system will be capable of operating effectively in conjunction with a gas exhaust/ventilation system to minimise deflagration risks. System design, water supply requirements and drainage capture design will be fully agreed with SYFR*." Namely, if additional

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
	water is required for a dry pipe system the drainage capacity will be increased to accommodate water discharged from that system.
Topic - Minimum Offsets Document Reference - 7.16 Framework Battery Safety Management Plan, Section 2.1.16 Issue Reference - EAGWCL-07 Issue - Omission to include minimum offsets for any geological or hydrogeological features. Impact - Effects on geological or hydrogeological features not fully considered and minimised. Solution - Include minimum offsets for any geological or hydrogeological features	As indicated in **Volume III, Appendix 14-3: PRA – Grid Connection Corridor [APP-184, APP-185]**, there are no Local Geological Sites within the Solar PV Site and within 250 m of the Solar PV Site. Section 4.5 of the **Framework BSMP [APP-205]** specifies that at the detailed design stage in alignment with 2024 NFCC draft guidelines (2024), a BESS Area system and site-specific Plume Analysis study will be conducted by the Applicant post consent once the specific battery technology to be used for the Scheme is confirmed. The site-specific Plume Analysis study will assess the environmental impact of an incident to sensitive receptors within a 1km radius.
Topic - National Fire Chiefs Council (NFCC) 2024 guidance Document Reference - 7.16 Framework Battery Safety Management Plan, Section 1.5.3a., 2.1.23 b., 2.1.23 c. 6.3 Environmental Statement - Volume III Appendix 9-4: Framework Drainage Strategy, Section 2.3.2, 2.3.3. Issue Reference - EAGWCL-08 Issue - The applicant cites National Fire Chiefs Council (NFCC) 2024 guidance. The 2024 version of this document, as given in the references, is Draft only and not expected to be published until later in 2025. The NFCC website states that "while the publication of the revised NFCC guidance is awaited, the 2023 version of the BESS guidance remains current". Some matters, such as safe distance between BESS enclosures, the quantity of firewater required and target flow rates and tank volumes are notably different between the current and the unpublished revised guidance. Impact - Inappropriate recommendation used to inform plans. Solution - The applicant should therefore use the current published guidance in the meantime. Additional Comments - We accept that it may be pragmatic for the applicant to refer to the unpublished document, as it might be published prior to the next phase of the application process, while noting that its content may be subject to change and should not be relied upon. The current guidance is more conservative in these matters, so should not be overlooked: • 7.16, Section 2.1.23 b. quotes a separation distance of 3 m between BESS enclosures and ESS equipment, and 3 m between adjacent BESS enclosures". The current guidance requires 6 m. • 7.16, Section 2.1.23 c. states: "NFCC guidelines allow reduced separation distances if suitable design features can be introduced." In the current guidance, it is stipulated that this should be designed by "a competent fire engineer". The attenuation basin and swales are designed to store the volume of fire water recommended by the NFCC and the water from a 1 in 2-year storm event, plus an additional 30% in the swale (6.3 App 9-4 Drainage, sections 2.3.2 and 2.3.3). Note that the current NFCC guidance for fire water volumes should be used. The target flow rates and tank volumes (7.16, sections 3.2.2 and 3.2.3) are based on the unpublished NFCC 2024 guidance, which are less than the current guidance. The applicant should ensure that their designs follow current guidance.	The Applicant has shared site illustrative 3m equipment spacing with SYFRS and they have not expressed a view that 6 m spacing is required. NFCC guidance of 6 m spacing was taken from FM DS 5-33 (2017) FM Global Datasheet, Lithium-Ion Battery Energy Storage Systems which was updated in 2023 and significantly reduced BESS Container spacing requirements. In Relevant Representations from SYFR they state that "*In the event that the developer cannot demonstrate that a thermal event/fire can be contained to the BESS of origin, then the developer should be referred to guidance such as the separation distances within NFPA 855 (current edition - 2023). NFPA 855 states separation can be reduced to at least 3 feet or 0.914m between BESS if tests such as UL 9540A shows propagation does not occur.*" Paragraph 2.1.10 of the **Framework BSMP [APP-205]** stipulates *"If the BESS system is designed to safely burn out without internal fire suppression systems (to remove the risk of stranded energy in the battery systems), full-scale free burn testing will be conducted to demonstrate that loss will be safely limited to one container without the intervention of SYFR. BESS designs available in 2024 compliant with this good practice include the Tesla Megapack 2XL, Fluence Cube, and Wartsila GridSolv Quantum BESS systems. These BESS designs have conducted UL 9540A and 3rd Party full scale free burn testing to validate safe equipment spacing and demonstrate that deflagrations do not occur or can be safely constrained. UL 9540A heat flux test data can also establish safe distances between containers and ESS equipment but will not be conclusive if full propagation of the battery system does not occur in the test.*" Paragraphs 2.1.23, 2.1.30, 2.1.31, 3.6.2, and 4.1.6 of the **Framework BSMP [APP-205]** demonstrate that the Applicant will provide comprehensive test data to validate the final equipment spacing configuration at the detailed design stage. Paragraph 3.2.3 of the **Framework BSMP [APP-205]** outlines that four water tanks will hold between 180,000-244,000 litres of water which incorporates both the existing, and draft revised NFCC guidance for water supply volume. The proposed site total water tank capacity for the Scheme is 720,000-976,000 litres, current NFCC guidance requires 488,000 litres. The Applicant emphasises that both solutions exceed NFCC guidelines. Paragraph 3.2.2 of the **Framework BSMP [APP-205]** states *"Fire Hydrants provided will achieve a flow rate of 1500 - 1900 litres per minute, flow rate will be agreed with SYFR and will align with the latest NFCC guidance at the time of the detailed design. The drainage solution will accommodate the agreed water supply volume*." The incorrect version of the NFCC guidance has been referenced in **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]**. The Applicant can confirm that the 2023 version of the NFCC guidance which has been used to inform the **Volume III, Appendix 9-4: Framework Drainage Strategy.**

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Topic - Penstock Document Reference 6.3 Environmental Statement - Volume III Appendix 9-4: Framework Drainage Strategy Issue Reference - EAGWCL-09 Issue - Omission to confirm if penstock valve will close automatically or manually in the event of a fire. Impact - Potential to pollute surface and groundwaters from contaminated firewater runoff. Solution - If firewater is to be applied automatically in the event of a fire, then the penstock should also be closed at the same time. If the automatic fire suppression system does not apply water, and therefore water will only be applied by the Fire and Rescue Service, then the requirement to close the penstock prior to the application of water should be reflected within the Battery Safety Management Plan.	While **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]** describes the approach to fire water collection, it does not state whether the penstocks used to isolate the area around a burning BESS Container would be automated. The Applicant confirms that an automatic internal BESS Fire Suppression System (if integrated) will have a separate drainage capture system. For SYFRS firefighting water requirements, drainage system/penstock operations protocols will be incorporated into the Emergency Response Plan (ERP) and Risk Management Plan drafted with SYFRS at the detailed design stage. The **Framework BSMP [APP-205]** references these obligations in Paragraphs 3.5.5 and 3.5.7 and is secured by Requirement 5 of Schedule 2 in the **Draft DCO [APP-220]**.
Water Resources Topic - Consumptive uses of water during construction Document Reference - Environmental Statement: Chapter 9 – Water Environment Issue Reference - EAWR-001 Issue - The ES omits to provide details of sources of supply and permitting requirements for all activities which require consumptive uses of water. This includes: • Vehicle washing and other cleaning water – noted in GPP 13 in the context of pollution risk; however, the source of supply for this use is not specified in the ES or subsequently in the CEMP. • Concrete wash water – suitable facilities for this use are described in the ES (9.8.52) and the CEMP in the context of pollution risk; however, the source of supply for this water use is not specified. • The ES describes an adequate water supply on the site required for effective dust/particulate matter suppression/ mitigation, using non potable water where practicable and appropriate. The source of supply for this high consumption use is not specified. Impact - Potential risk posed to water resources. Solution - Provision of a Water Supply Strategy which where possible quantifies water requirements for the uses described above and specifies the sources of supply considered. Additional Comments - Section 9.8.5 of the ES describes a Water Management Plan (WMP) that will support the final detailed CEMP and provide greater detail regarding the mitigation to be implemented to protect the water environment from adverse effects during construction. We would request that a more comprehensive and focussed Water Supply Strategy is included in this document which where possible quantifies water requirements for the uses described above and specifies the sources of supply considered. This will help to identify obstacles or potential restrictions and to evaluate any (further) mitigation required. This will also help to expedite the formal permitting determination process closer to commencement and help to avoid delays.	As discussed in Paragraph 2.7.58 in **Volume I, Chapter 2: The Scheme [APP-054],** the Applicant anticipates that the Scheme would obtain the water required for the Operations and Maintenance Hub and temporary facilities from an existing water supply from a nearby farm with a separate meter installed. However, to present a worst case at construction it is assumed that this would not be available until the operation and maintenance phase of the Scheme and that all water would be imported by road from nearby licenced water abstraction sources and stored on site in Intermediate Bulk Containers (IBC) or similar. The water supplies detailed will be used for all activities during the construction phase of the Scheme. The Water Management Plan (WMP) secured as part of the **Framework CEMP [APP-196]** will quantify water requirements for the uses described above and specify the sources of supply considered. The Applicant considers this is sufficient for the purposes of this Application.
Topic - Climate Change and Drought Document Reference - Appendix 6-2 Climate Change Risk Assessment Issue Reference - EAWR-002 Issue - No mitigation considered for surface water sources during periods of increased temperatures, low rainfall and Drought conditions. Impact - Potential that licences will be restricted by low flow cessation conditions. Solution - Mitigation should be considered for onsite storage of water to buffer this risk.	Paragraph 9.4.18 of **Volume I, Chapter 9: Water Environment [APP-061]** details that that the Scheme would obtain the water required for the Operations and Maintenance Hub and temporary facilities from an existing water supply from a nearby farm with a separate meter installed which are not considered to be affected by periods of increased temperatures, low rainfall, and drought conditions. In order to present a worst case at construction it is assumed that this would not be available until the operation and maintenance phase of the Scheme and that all water would be imported. Water will be transported to the Order limits by road from an existing nearby licenced water abstraction source and stored on site in IBC, or similar. During construction, the contractor will

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Additional - Comments The appendix makes provision for the effects of increased temperatures, low rainfall and Drought conditions. If water supply is intended to come from surface water sources of supply during these conditions, (especially for purposes such as dust suppression which is likely to have highest demand during prolonged dry weather) it is likely that licences will be restricted by low flow cessation conditions. Mitigation should be considered for on site storage of water to buffer this risk. In the absence of a full consideration of sources of water supply, this has not therefore been considered in this assessment.	monitor weather forecasts on a monthly, weekly, and daily basis, and plan works accordingly based on anticipated weather conditions. As construction is anticipated to commence in 2028, it is not expected that climate change will significantly impact current water supplies. A WMP secured as part of the **Framework CEMP [APP-196]** will quantify water required for the Scheme and specify the sources of supply considered. The Applicant considers this is sufficient for the purposes of this Application.
General / Cross-cutting Comments - Topic Required Environment Agency permits and licences Document Reference - Consents and Agreements Position Statement - EN10152/APP/3.3 Issue Reference - EAGCC-001 Issue - The list of consents and agreements may not be conclusive and, depending on situations encountered, others may be needed that have yet to be identified, for example, relating to water resources licencing, water discharge permits and waste management. Impact - There is a risk of delays to the delivery of the Scheme where consents and agreements are insufficiently comprehensive to allow the Environment Agency to effectively deal with permit applications, queries and fully understand what the project requires. Solution - The Applicant should review the Consents and Agreements Position Statement document and further consider what is required. To avoid any delays during the project the Applicant should ensure that the Consents and Agreements Position Statement comprehensively covers a range of scenarios that may, or may not occur, insofar as it is possible. Additional Comments - We recommend early engagement and pre-application advice is sought to ensure that all the consents, agreements and supporting management strategies are in place and issued without undue delay.	The Applicant requires a range of consents and agreements to construct and operate the Scheme. As explained in the **Explanatory Memorandum [APP-222]** powers which mean some of these consents are not separately required are provided for in the **Draft DCO [APP-220]**, however there are other consents from different regulatory organisations that will be required separately to the DCO. The need for such consents and how these are to be obtained is explained in the **Consents and Agreements Position Statement [APP-017].** The Applicant considers the combination of the draft DCO powers and the consents listed in the **Consents and Agreements Position Statement [APP-017]** are comprehensive.
Appendix 2 – Draft Development Consent Order and other documents – key issues and advice. Development Consent Order (DCO) Requirements Topic - Additional Requirement – Protection of the Thorpe Marsh Storage Area Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-001 Issue - We request an assessment that identifies the risks relating to works in proximity to the Thorpe Marsh flood storage area. Impact - Increased flood risk and potential adverse effects on flood assets Solution - Include a suitably worded Requirement in the DCO	The Applicant has responded to the specific issue raised in the rows above (EAFR-001). A new requirement is not required, as the Thorpe Marsh flood storage area will be sufficiently protected by the protective provisions included for the benefit of the Environment Agency at Schedule 14, Part 5 of the **draft DCO [APP-220]**.
Topic - Additional Requirement – Cable Depths/Buffer Zones Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference EAREQ-002 Issue - We request the inclusion of a DCO Requirement to agree and secure cable depths and buffer zones within the order limits Impact -To ensure the protection of flood related assets Solution- Include a suitably worded Requirement in the DCO	The Applicant has responded to the specific issue raised in the rows above (EAFR-002). A new requirement is not required, as the cable depths and buffers are secured by the protective provisions included for the benefit of the Environment Agency at Schedule 14, Part 5 of the **Draft DCO [APP-220]**, and by the **Outline Design Parameters Statement [APP-193]**, which is secured by Requirement 4 of the **draft DCO [APP-220]**.
Topic - Additional Requirement – Design life of retained components Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-003	The Applicant has responded to the specific issue raised in the rows above (EAFR-003). Requirement 18 of Schedule 2 in the **Draft DCO [APP-220]** has been updated to require City of Doncaster Council consults with the Environment Agency before approving the detailed DEMP to ensure they can comment in respect of matters like flood risk at the time of decommissioning.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Issue - We request the inclusion of a DCO Requirement relating to the reassessment of flood risk for the retained components. Impact - The flood risks associated with these components may not have been assessed for the period that they will be left in situ. Solution - Include a suitably worded Requirement in the DCO	
Topic - Additional Requirement – Decommissioning / DEMP Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-004 Issue - We request the inclusion of a DCO Requirement ensuring relevant stakeholders are consulted on the DEMP to consider issues such as: # • Defining timelines. • Components to be removed. • Conditions for removal to prevent flood impacts. Impact - Adverse effects to flood risk during decommissioning. Solution - Include a suitably worded Requirement in the DCO	The Applicant has responded to the specific issue raised in the rows above (EAFR-004). The Applicant has updated Requirement 18 in the Draft DCO for Deadline 1 to include the Environment Agency as a required consultee to ensure its input on these matters.
Topic - Additional Requirement – Impermeable areas Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-005 Issue - We request the inclusion of a DCO Requirement for an assessment and management of increased rate of runoff for all impermeable areas. This could be included within the Drainage Strategy. Impact - Increased flood risk. Solution - Include a suitably worded Requirement in the DCO	The Applicant has responded to the specific issue raised in the rows above (EAFR-005). A new requirement is not required as the drainage strategy is already secured within Requirement 9 of the **Draft DCO [APP-200]**. **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]** provides an assessment of and mitigation for the handling of surface water generated by new impermeable areas within this part of the Order limits, including the BESS Area and On-Site Substation.
Topic - Additional Requirement – Changes to the existing Thorpe Marsh substation Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-006 Issue - We request the inclusion of a DCO Requirement for an assessment regarding the proposed changes to the existing Thorpe Marsh substation to determine potential effects on flood risk. Impact - Potential flood impacts unknown. Solution - Include a suitably worded Requirement in the DCO	The Applicant has responded to the specific issue raised in the rows above (EAFR-006). Works to the Existing National Grid Thorpe Marsh Substation will be undertaken by National Grid, and do not fall within the scope of this draft DCO. It is therefore inappropriate and beyond the scope of the draft DCO for a new requirement to be included in respect of these works.
Topic - Additional Requirement – Flood storage compensation Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-007 Issue - We request the inclusion of a DCO Requirement to produce an assessment around the need for flood storage Compensation. Impact - Cumulative increase in flood risk. Solution - Include a suitably worded Requirement in the DCO	The Applicant has responded to the specific issue raised in the rows above (EAFR-007). A new requirement is not considered to be required, however, floodplain compensation will be provided to account for loss of floodplain volume where permanent Scheme infrastructure (comprising Solar PV Mounting Structures and Field Stations) are located within the Credible Maximum Scenario flood extent. This is secured in the Framework CEMP which has been updated for Deadline 1.
Topic - Additional Requirement – Clear span bridges and soffit level Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference EAREQ-008 Issue - We request the inclusion of a DCO Requirement for further information relating to the use of clear span bridges with a soffit 300mm above the design event for any new crossings.	The Applicant has responded to the specific issue raised in the rows above (EAFR-008). A new requirement is not required as the **Framework CEMP [APP-196]** already commits to clear-span bridges for new crossings but has been updated at Deadline 1 to include reference to the 300 mm soffit above the design event.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Impact - Increased flood risk and maintenance challenges. Solution - Include a suitably worded Requirement in the DCO	
Topic - Additional Requirement – Construction compound locations Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-009 Issue - We request the inclusion of a DCO Requirement to identify the siting of compound locations, which should be included within the CEMP. Impact - Compounds within the design flood extent could increase flood risk. Solution - Include a suitably worded Requirement in the DCO Additional Comments - If construction compounds are within the 1 in 100-year flood extent during construction, then we may require flood storage compensation, and this should be included within the CEMP.	The Applicant has responded to the specific issue raised in the rows above (EAFR-009). A new requirement is not required as the **Framework CEMP [APP-196]** has been updated for Deadline 1 to include a commitment to locating all construction compounds outside the 3.3% AEP flood extent (i.e. Flood Zone 3b).
Topic - Additional Requirement – Trenchless crossing locations Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-010 Issue - We request the inclusion of a DCO Requirement for further information regarding HDD locations and proposed proximity relative to watercourses and flood assets as the detailed design stage. Impact - Altered flood risk assessments. Solution - Include a suitably worded Requirement in the DCO Additional Comments - This may necessitate a detailed assessment of flood asset dimensions.	The Applicant has responded to the specific issue raised in the rows above (EAFR-010). A new requirement is not required because management of crossings of watercourses and flood assets held by the Environment Agency and IDBs will be sufficiently controlled by the protective provisions in favour of the Environment Agency and IDBs included in Schedule 14 of the **draft DCO [APP-220]**.
Topic - Additional Requirement – CEMP Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-011 Issue - We request the inclusion of a DCO Requirement to ensure the Environment Agency is consulted on all detailed CEMP(s) Impact - At this stage the Applicant can only provide a Framework CEMP, and the proposal is still developing which implies some uncertainty in the proposal. Solution - Include a suitably worded Requirement in the DCO Additional Comments - We may request additional considerations outside of the Framework CEMP as the proposal develops	The Applicant has responded to the specific issue in the rows above (EAFR-011). The Applicant has updated Requirement 11 of the Draft DCO at Deadline 1 to include the Environment Agency as a consultee on the detailed CEMP.
Topic - Additional Requirement – Construction phase timing Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-012 Issue – We request the inclusion of a DCO Requirement for details relating to the construction phase window. Impact - Increased flood risks from climate change beyond assessed levels. Solution - Include a suitably worded Requirement in the DCO	The Applicant has responded to the specific issue raised in the rows above (EAFR-012). A new requirement is not required as **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159]** already appropriately considers the likely time periods in which construction could occur, and Requirement 1 of the **Draft DCO [APP-220]** ensures construction cannot commence later than 5 years from the grant of the consent (which given the examination and decision timeframes within the Planning Act 2008 means that construction is unlikely to commence past 2031).
Topic Additional Requirement – Inspections / surveys Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-013	The Applicant has responded to the specific issue raised in the rows above (EAFR-013)). A new requirement is not required as the protective provisions included in Schedule 14 Part 5 of the Draft DCO allow the Environment Agency to have input and sign off on any detailed design which impact any assets managed by the Environment Agency.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Issue - We request the inclusion of a DCO Requirement to provide further information about investigations / surveys of assets which will be in proximity to the cable corridor. Impact - Unknown conditions of flood assets could exacerbate risks. Solution - Include a suitably worded Requirement in the DCO	
Topic - Additional Requirement – Cables within an existing vehicular crossing Document Reference Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-014 Issue - We request the inclusion of a DCO Requirement to: • assess the residual life of retained crossings which must be commensurate with the lifetime of the development • ensure the removal all utilities within bridges at the decommissioning phase. Impact - Increasing the cost of crossing replacements as it requires the diversion of utilities and potential maintenance issues Solution - Include a suitably worded Requirement in the DCO Additional Comments - If the life of the crossings are insufficient then the crossing should be replaced (preferably with a clear span bridge).	The Applicant has responded to the specific issue raised in the rows above (EAFR-014). A new requirement is not required as it notes that final decisions on whether to decommission cabling or not will be made at the time of decommissioning, and the Applicant proposes to include the Environment Agency as a required consultee on the final DEMP (Requirement 18 of the **Draft DCO [APP-220]**) and as such the Environment Agency will be able to comment on the status of crossings at the time of decommissioning.
Topic - Additional Requirement – Invasive Non-Native Species Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-015 Issue - We request the inclusion of a DCO Requirement for an INNS Management Plan Impact - This is to secure the production of an INNS Management Plan, to be agreed with the Environment Agency prior to commencing any construction works Solution - Include a suitably worded Requirement in the DCO	The Applicant has responded to the specific issue raised in the rows above (EAFBG-001). A new requirement is not required as the Biosecurity Plan referenced in the **Framework CEMP [APP-196]** will set out procedures to ensure that no INNS are brought onto or exported out of the Order limits. This is secured by Requirements 11 and 18 of Schedule 2 in the **Draft DCO [APP-220]**.
Topic - Additional Requirement – Sensitive receptors – Source Protection Zones Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference - EAREQ-016 Issue - We request the inclusion of a DCO Requirement to identify and protect Source Protection Zones Impact - Risks to Source Protection Zones may be overlooked Solution - Include a suitably worded Requirement in the DCO	The Applicant has responded to the specific issue raised in the rows above (EAGWCL-01). A new requirement is not required as Section 3.4 of the **Framework CEMP [APP-196]** addresses the potential impacts to groundwater and surface water resources. This has been updated for Deadline 1 to explicitly state that the mitigation measures are relevant to SPZ within the Order limits. Further detail will be added into the detailed CEMP post consent to incorporate any final mitigation confirmed at the detailed design stage.
Topic - Additional Requirement – Unsuspected Contamination Document Reference - Draft DCO, Schedule 2, Requirements Issue Reference EAREQ-017 Issue - We request the inclusion of a DCO Requirement for a plan to manage unsuspected contamination found on site. Impact - Risk to controlled waters Solution - Include a suitably worded Requirement in the DCO	The Applicant has responded to the specific issue raised in the rows above (EAGWCL-02). A new requirement is not considered to be required as Table 3-13 of the Framework CEMP has been updated for Deadline 1 to include specific controls regarding the discovery and management of contamination within the Order limits.
Book of Reference Document References - EN010152/APP/4.3 Book of Reference – October 2024 Comments - The Environment Agency has land interests that fall within the limits of the DCO. Details of which can be found in Appendix 3	The Applicant notes that the Environment Agency has land interests within the Order limits.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Appendix 3 – Environment Agency Land Ownership & Interests We have checked the shapefiles of the site boundary and the connection corridor against our GIS layers to check for EA land ownership and interest. There are 4 areas of affected EA land which are identified below. Each plan name refers to the relevant sheet number in the submitted document EN010152-000049-2.5 Location Plan.pdf Sheet 2: EA Freehold within site boundary, deed reference 21127 [image inserted] Sheet 4: EA Freehold within site boundary, deed reference 21127 [image inserted] Sheet 9: EA Registered land SYK620774 and freehold and tenancy, Estateman reference NE07609 'Smallholme & Tilts Plot 9' within the refined corridor [image inserted] Sheet 10: EA Registered land SYK586456, freehold and tenancy NE04050 'Don Plot 50, Barnby Dun' adjoining and within the refined corridor [image inserted]	The Applicant notes that the Environment Agency has four areas of land affected by the Scheme and understands that no objections have been raised regarding these. The Applicant has provisionally agreed a form of protective provisions for the benefit of the Environment Agency which are included within the **Draft DCO [APP-220]** as Part 5 of Schedule 14. These allow the Environment Agency to have input and sign off on any detailed design which impact any assets managed by the Environment Agency.
Appendix 4 – Supplementary advice to the Applicant **Flood Risk** **Disapplication of Flood Risk Activity Permits** Based on the submitted documents, the disapplication of FRAPs will not be acceptable for Fenwick Solar Farm at this time. This position relates to the Thorpe Marsh flood storage area which is proposed to be crossed by the cable corridor. Alongside concerns around the potential impact on storage capacity and impact on asset maintenance arising from the permanent works, is the potential damage caused by the construction of the cable route. If the applicant is currently able to disapply the permitting regulations it becomes more difficult to agree a safe construction method that includes the appropriate emergency mitigations and repair specifications as set out by the reservoir supervising engineer. During the FRAP process we would be able to work closely with the applicant to agree an appropriate working method to ensure our asset is not damaged, can be maintained by our Operations Team and continues to function in the way it was designed at the same capacity.	The Applicant has provisionally agreed a form of protective provisions for the benefit of the Environment Agency which are included within the **Draft DCO [APP-220]** as Part 5 of Schedule 14. Subject to the resolving of outstanding technical matters, the Applicant understands that the parties will be in a position to agree disapplication under the Environmental Permitting (England and Wales) Regulations 2016.
Residual Flood Risk In the context of the River Went outfall breach scenario: we advise the Applicant to raise finished floor level of the Field Station(s) to 300mm above this level or move outside of this flood extent. This will help to ensure that they can safely manage residual flood risk. (Notably FRA Table 5-2 suggests that Field Stations will be raised 300mm above the Credible Maximum Scenario flood level – of which there is only one in Field NE9.) Table 9-18 states that: "Due to the presence of flood defences along sections of the River Went and River Don, there is a residual risk of flooding to the Solar PV Site if there was overtopping or a breach of the flood defences." Please note that we would not consider overtopping to be residual flood risk.	Where Solar PV Panels are located within the Credible Maximum Scenario flood extent, the lower edge will be raised 400 mm above the flood level associated with this event and any Field Stations located within surface water flood extents (within Fields SW6, SW3, SW9, SW10, SW4, SW8, NE8, NE7, NE9, NW6) will be raised 300 mm above the surface water flood level. **Volume III, Appendix 9-3: Flood Risk Assessment [APP-156]** is being updated for Deadline 2 to confirm which Solar PV Panels will be raised to 400 mm above the Credible Maximum Scenario flood extent and the mitigation that will be provided.
Thorpe Marsh water storage area We may require HDD for the cable crossing under Thorpe Marsh flood storage area. FRA 6.6.3 states that:	As confirmed in **Volume I, Chapter 9: Water Environment [APP-061], Volume III, Appendix 9-3: Flood Risk Assessment [APP-158, APP-159],** and Section 3.4 of the **Framework CEMP**

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
"The risk of flooding from artificial sources is considered low during construction, operation and maintenance and decommissioning as the Grid Connection Cables will be buried." Until Thorpe Marsh flood storage area is considered in more detail we disagree with this conclusion. Section FRA 7.3.2 states that: "The depth and construction around the Thorpe Marsh WSA and flood defence embankments will be identified through liaison with the Environment Agency and horizontal directional drilling will be used at a sufficient depth to avoid compromising the structural integrity of the flood defence embankments and WSA." We will need extensive detail on programme timescales, justification, flood risk assessments ensuring that storage is not effected as a result of the cable laying, information on potential requirement for maintenance that would introduce "regular" digging up of the reservoir. We will need to discuss this matter with the Applicant to agree a way forward on this matter (e.g., appropriate depth / proximity, methodology, etc).	**[APP-196]**, the Applicant will continue to engage with the Environment Agency regarding the Scheme. The Applicant has provisionally agreed protective provisions with the Environment Agency in respect of flood risk management and impacts on its assets. These protective provisions include controls whereby the Environment Agency would need to approve works within its drainage and flood storage works, including the Thorpe Marsh flood storage area. The Applicant considers this will provide the Environment Agency the primary vehicle for input into works within the Thorpe Marsh WSA and its other flood defence assets. A detailed CEMP will be prepared (as secured by Requirement 11 of Schedule 2 of **Draft DCO [APP-220]**) for the approval by City of Doncaster Council as the relevant planning authority. Requirement 11 has been updated for Deadline 1 to include a requirement for consultation with the Environment Agency in the discharge of the detailed CEMP. The Applicant considers this appropriately addresses the Environment Agency's request in respect of a requirement. Given the security provided by the protective provisions and **Framework CEMP [APP-196]**, the Application does not propose to add additional construction methodology information to **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]** at this stage.
Reservoirs The Applicant should liaise with the reservoir undertakers to determine whether the proposal could alter the risk category of a reservoir.	**Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]** confirms that the Scheme is not expected to increase the risk category of a reservoir and, therefore, no liaison with reservoir undertakers is anticipated to be required.
Flood Modelling **Watercourse Crossings – Access Tracks** We welcome the proposal, as described in section 9.8.48, to use existing crossings where possible. Where new crossings are proposed we welcome the proposal to use open span bridges with abutments set back from the top of bank. Any proposed crossings should be designed so that the soffit level of any bridges sits above the design flood level. The design flood level for permanent crossings in this case would be the 1% (1 in 100) annual exceedance probability (AEP) plus higher central climate change scenario. For temporary crossings as part of the construction phase of the scheme the present day (without climate change) 1% (1 in 100) AEP scenario can be used. Careful consideration will need to be given to how the design flood level will be determined for the proposed crossings. Typically, this would be determined by undertaking hydraulic modelling or referring to existing detailed hydraulic modelling data (where available). The production of the new Risk of Flooding from Rivers and Sea dataset at the end of January 2025 may provide some useful information which may help inform crossing soffit levels. Further information is available online at: Updates to national flood and coastal erosion risk information - GOV.UK. If a reliance is being placed on existing flood risk products such as the Risk of Flooding from Surface Water (RoFSW) mapping to inform soffit levels, then clear justification should be provided as to why this is a suitable proxy for representing fluvial flood risk taking into consideration the effects of climate change. The proposed crossings should be designed such that they do not increase flood risk elsewhere.	Where the two culverts are being extended and one removed as part of the Scheme, the Applicant is undertaking hand calculations which will be presented in updates to **Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]** for Deadline 2 to demonstrate that there are no adverse impacts from these elements of the Scheme. This approach was discussed and agreed with the Environment Agency in meetings held on 28 February 2025 and 22 April 2025. This is considered proportionate given the size of the watercourses and the changes proposed to the culverts as part of the Scheme.
Groundwater & Land Affected by Contamination **Shallow Groundwater** The assumed hydrogeological setting of the site is discussed in various reports supplied. In ES Vol. I, Section 9.7.58 Table 9-7, the applicant notes that shallow groundwater (2-3mbgl) is expected. In 6.3 App. 9-4 Drainage, shallow groundwater at 0.6m to 3 m is noted (1.4.3). This is within the target foundation depth, so will need to be allowed for in construction design. Temporary or permanent	Table 3-4 of the Framework CEMP has been updated for Deadline 1 to include specific reference to the need for groundwater monitoring to be undertaken preconstruction. The update also includes a requirement for seasonal variation to be considered as part of the groundwater monitoring schedule. Further detail will be added into the detailed CEMP post consent and at the detailed design stage. Requirement 11 of Schedule 2 in the Draft DCO has been updated at Deadline 1 to include a requirement for consultation with the Environment Agency as part of the discharge of the detailed CEMP.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
dewatering may also be required, and we recommend the applicant considers this at the earliest opportunity. The WFD report, Section 2.4.2, identifies that "groundwater levels are estimated based on published sources and will be confirmed through ground investigation post consent, introducing a degree of uncertainty regarding the exact groundwater conditions." We recommend that the groundwater monitoring schedule should consider conditions at different times of year to allow for seasonal variation.	
Proposed intrusive investigation works The applicant is proposing intrusive ground investigation works post-consent (ES Vol. I Section 14.4.23, and WFD report, Section 2.4.2). This will need to be completed prior to the detailed CEMP and other relevant documents so that any pertinent ground conditions can be appropriately considered. The scope of the investigation is proposed to target potential sources of contamination identified in the Preliminary Risk Assessments (6.3 App. 14-3, Section 12.1.3). We suggest that the applicant may benefit from undertaking more widespread sampling to identify background conditions across the site. This sampling can also be used to undertake geotechnical and geochemical testing and analyses. Widespread sampling might be necessary for foundation and earthworks design. The applicant proposes that implementation of the recommendations of the GQRA into the detailed CEMP will be sufficient to ensure risks "to human health, controlled waters and other sensitive receptors is considered acceptable"	Ground investigation works will be undertaken prior to commencing construction as outlined in the **Framework CEMP [APP-196]**. The ground investigations will target areas identified for potential contamination, however, more widespread investigation (likely following a wide grid pattern) may be carried out to give a general overview of the shallow ground conditions. The Applicant notes that the Environment Agency considers the measures to ensure risk to human health, controlled waters and other sensitive receptors are considered acceptable.
Earthworks, soil management and waste The PRA reports refer to the CL:AIRE Definition of Waste: Code of Practice (DoW:CoP), which we agree with. It is also mentioned in the fCEMP, Section 2.10.4, but the reference is not repeated in Table 3-16, where we feel it would also be relevant. The DoW:CoP is not mentioned in the framework Soil Management Plan (fSMP) (such as in Section 1.1.3), which is a disappointing omission. In 6.3 App. 14-3, Section 12.1.3, the applicant states that the proposed ground investigation works "can be used to … allow for considering options for appropriate reuse". The scope of works currently suggested in 12.1.1 and 12.1.2 is unlikely to be sufficient to inform assessments for reuse of material. Any additional sampling could be carried out at a later time, when earthworks requirements are better understood. The fSMP refers to The Ministry of Agriculture Fisheries and Food's (MAFF) Good Practice Guide to Handling Soils (7.10 fSMP, Section 1.1.3 b.). The date given in the reference list is 2020, however this should be 2000. The guidance was withdrawn in 2009, as is clearly shown on the website given as a link in the references section. MAFF was dissolved in 2002, and its responsibilities were merged into Defra. The website for Institute for Quarrying's Good Practice Guide for Handling Soils in Mineral Workings (Ref. 3 in the fSMP) clearly states that it succeeds Defra's (i.e. MAFF's) guidance, rather than provides an update to it, as stated in the document. The applicant must ensure that they are using current guidance, and that they understand how to follow it. The applicant states that "Detailed soil surveys are not proposed for the Grid Connection Corridor because there would be no above ground infrastructure and therefore any impacts would be temporary during construction and subject to the measures outlined within this Framework SMP" (7.10 fSMP Section 1.1.6). Soil management and earthworks will be required while laying buried cables in the corridor, including at temporary construction compounds and HDD sites (such as excavations for catch pits). While these will be removed prior to the operational phase, the works and impacts must be considered and managed in accordance with all relevant guidance. The Framework Soil Management Plan has no figures or supporting information. The final detailed SMP will need significantly more information to serve as a functional product.	The **Framework SMP [APP-199]** relates to the agricultural soils within the Order limits. These soils are considered clean, naturally occurring materials and there is no intention to discard these agricultural soils off-site. For these reasons it was not considered that the soils meet the CL:AIRE Definition of Waste: Code of PracticeDoW:CoP. The date of the Ministry of Agriculture Fisheries and Food (MAFF) Good Practice Guide to Handling Soils reference is typed incorrectly. The Applicant can confirm that correct year of publication is 2000. The IoQ document was designed specifically to help the mineral industry and its contractors and provided a successor document from the MAFF/Defra document, for the sector. The information contained also has direct relevance to agriculture but in the context of agricultural land it was considered that it was more appropriate to refer to it as an update to the MAFF guidance.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Water Framework Directive In general, we are satisfied that the WFD report has been completed using appropriate methodology, and the current WFD status for groundwater has been identified. The report presents the findings of only the first stage in the WFD process and a WFD scoping assessment (6.3 App. 9-3 WFD, Section 1.1.8). We assume that stages 2 and 3 will be completed in due course. 6.3 App. 9-3 WFD, Section 2.4.2 states: "groundwater levels are estimated based on published sources and will be confirmed through ground investigation post-consent, introducing a degree of uncertainty regarding the exact groundwater conditions." We therefore expect this report to be updated when further information has been acquired, and the information used to support further stages of the WFD assessment. The applicant states that "A Study Area of 1 km from the Order limits has been considered in order to identify water bodies that are potentially hydrologically connected to the Scheme" (6.3 App. 9-3 WFD, Section 3.1.2). The Idle Torne - PT Sandstone Nottinghamshire & Doncaster (GB40401G301500) groundwater body is approximately 850m from the proposed substation and grid connection boundary in the south, but it is not listed as a water body within 1km of the site (Table 1). This water body is unlikely to be in hydrogeological connectivity with the site, but we are disappointed that it has not been acknowledged and screened based on the parameters the applicant has defined. The applicant is satisfied that the development meets the aims of the WFD and will not lead to deterioration of groundwater (6.3 App. 9-3 WFD, Section 7.1.6 Table 11). The CEMP, OEMP and DEMP are cited as being sufficient to mitigate all impacts (6.3 App. 9-3 WFD, sections 6.2.3, 6.4.4, 6.6.1). This can only be the case if all comments and concerns on the relevant documents are resolved. As the final detailed CEMP, OEMP and DEMP have not yet been completed, we cannot conclusively determine if we are satisfied. The whole DCO site is within a nitrate vulnerable zone. This is not mentioned anywhere in the WFD report, whereas we would expect it to be acknowledged.	The Applicant notes that the Environment Agency is satisfied with the Water Framework Directive (WFD) assessment presented in **Volume III, Appendix 9-2: WFD [APP-157]** and confirms that all stages of the WFD assessment have been completed for the Scheme. As noted, the Idle Torne - PT Sandstone Nottinghamshire and Doncaster (GB40401G301500) groundwater body is not likely to have hydrogeological connectivity to the Scheme. The Applicant can confirm that this groundwater body has been considered in **Volume III, Appendix 9-2: WFD [APP-157]** but that it was screened out of the WFD assessment. Ground investigation works will be undertaken prior to commencing construction as outlined in the **Framework CEMP [APP-196]**. The Applicant will produce a detailed CEMP post consent, during the detailed design stage, as secured by Requirement 11 of Schedule 2 in the **Draft DCO [APP-220]**. The Applicant acknowledges the presence of the nitrate vulnerable zone (NVZ) within the Order limits. This NVZ does not change the findings of the assessment.
Thorpe Marsh power station site 6.3 App14-4, Section 9.4.4, Table 9-4 notes "Potential Sources, Pathways and Receptors for the Grid Connection Corridor". In this table, the applicant identifies the former power station as a potential contamination source (source S1), and the likelihood of contamination leaching into aquifers as "unlikely". The superficial Alluvium in this location is a Secondary A aquifer, and we consider continuity with the bedrock Principal aquifer the be a plausible migration pathway. As such, and given the nature of the contamination source, we consider the likelihood of occurrence to be at least "Low" without further supporting evidence. This would make the risk at least "Moderate/Low", rather than "Low" as stated. The applicant has not presented any further information about this source, such as potential remediation or other site clean-up works that may be carried out as part of the demolition works, or planned construction of the new site. We expect this source to be considered further. In our responses to the Scoping Report and PEIR we expressed concern that Thorpe Marsh Power Station is a permitted landfill, and that the proposed development could potentially impact monitoring boreholes on the landfill. This does not appear to have yet been addressed in any of the reports submitted with the Environmental Statement. 6.3 App. 14-4 Figure 2 identifies "remnant gas holders" within the footprint of the former power station (identified on Fig. 3). These are not specifically mentioned in the report text, which is disappointing as they would be a potential source of gross contamination. We would expect remnant gas holders within this location to receive more detailed attention. Based on historical aerial imagery (for example, 6.3 App. 14- 4 Part 2, p. 367, photo from 2009) these appear to be cooling towers, not gas holders. We would recommend that this area is targeted in any intrusive investigation works.	The Applicant has refined the Grid Connection Corridor since the EIA Scoping Report and PEIR and no longer includes the area of historic landfill near Thorpe Marsh power station within the Order limits. This is detailed in Section 3 of Annex A in **Volume III, Appendix 14-4: Phase 1 Preliminary Risk Assessment (PRA) – Grid Connection Corridor (Part 2 of 2) [APP-185]** and Paragraph 14.8.13 of V**olume I, Chapter 14: Other Environmental Topics [APP-066]** outlines "*There is one permitted (currently closed) landfill site within 150 m of the Order Limits, located at the Existing National Grid Thorpe Marsh Substation. The Grid Connection Corridor is outside of this landfill site. Impacts on mineral and waste sites are not considered further in the assessment*." The Applicant accepts an amendment to the likelihood of occurrence to 'Low' making the risk 'Moderate/Low'. Ground investigation works will be undertaken prior to commencing construction as outlined in the **Framework CEMP [APP-196]**. The Applicant will produce a detailed CEMP post consent, during the detailed design stage, which must be substantially in accordance with the **Framework CEMP [APP-196]** as secured by Requirement 11 of Schedule 2 in the **Draft DCO [APP-220]**.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
Construction Phase Potential impacts on the water environment and associated mitigation are summarised as 7.7 fCEMP, Section 3.4, Table 3-4. Mitigation and measures for controlling runoff (such as lagoons) do not mention infiltration to groundwater. Monitoring requirements don't specifically include groundwater. Foundation works are not acknowledged or specifically addressed, but we consider these also have the potential to impact the water environment. Potential impacts on ground conditions and associated mitigation are given as 7.7 fCEMP, Section 3.13, Table 3-13. Our comments are: Mitigation measure (c) relates to containment measures; we suggest this also includes refuelling on impermeable surfaces, as is stipulated in Table 3-4. Mitigation measures (e) and (g) relate to identification of contaminated ground during works. We would request that where this is identified, all works stop within the identifiable or likely bounds of the maximum extent of the contamination until further investigation is completed. Any remediation will need to be agreed with the EA and LPA prior to commencement. Remedial works must be signed off as complete by those bodies before works re-commence. Note CDM regulations relate to human health, and do not apply to contamination of groundwater, which needs to be considered in addition. Mitigation measure (m) relates to piling design. If piling is anticipated to enter the bedrock principal aquifer, especially in areas of SPZ3, a hydrogeological risk assessment may also be required. The limited intrusive ground investigation proposed must therefore be sufficient to achieve this end. Currently the plan is to only target areas of suspected contamination sources which would not provide sufficient representative coverage.	Table 3-4 of the **Framework CEMP [APP-196]** notes that the relevant Good Practice Guidance (GPP) will be followed, specifically noting GPP6 Working on Construction and Demolition Sites. Table 3-4 also notes the use of SuDS in the design of the Scheme to minimise the risk of pollution to groundwater and that a WMP would be delivered as part of the detailed CEMP as secured through Requirement 11 of Schedule 2 in the **Draft DCO [APP-220]**. The WMP will include details of pre, during and post construction water quality monitoring and measures for both surface water and groundwater requirements, including SPZ. CIRIA C532, Control of water pollution from construction sites – guidance for consultants and contractors is noted as one of the documents which should be used. With regards to any contamination discovered, point g in Table 3-13 of the Framework CEMP has been updated for Deadline 1 to provide additional detail regarding the actions that, in the event contamination is identified, would be taken to protect construction workers, future site users, water resources, structures and services. Any remediation activities would be discussed with the Environment Agency and other relevant stakeholders prior to the construction phase commencing. However, the Scheme is not expected to introduce any significant new pollution pathways to groundwater.
Decommissioning During decommissioning, the reports are inconsistent whether underground cables and other infrastructure will be entirely removed or partially left in situ: • EA Vol. I Chapter 2.9.3: "When the operation and maintenance phase ends … All Solar PV Panels, mounting piles and concrete blocks, cabling … would be removed from the Solar PV Site" • 7.9 fDEMP, Section 1.1.4: "Within the Solar PV Site … all Solar PV Panels, mounting structures and concrete blocks, cabling … will be removed to plough depth" It is not specified in the fDEMP, but we assume the intention is that any cables below plough depth will be left in situ. The definition of "plough depth" is not given. This might not be the most environmentally suitable solution. In the grid connection corridor: • EA Vol. I Chapter 2.9.6: "it is possible that the On-Site Substation and Grid Connection Cables may remain in place/operational after the decommissioning phase of the Scheme. This cannot be confirmed at this time and will depend upon demand closer to the decommissioning date." • EA Vol. I Chapter 2.9.8 "Should the Grid Connection Cables be decommissioned, the mode of their decommissioning would be dependent upon government policy and good practice at that time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ" • 7.9 fDEMP, Section 1.1.6: "Currently, the most environmentally acceptable option is leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open up the entire length of the cable route." We expect the DEMP to consider the worst-case scenario, consistent with other parts of the EIA and in recognition of the Rochdale Envelope (ES Vol. 1 Chapter 2, Section 2.5.5). In this case, based on the information presented, that would be the requirement to remove the cables entirely; however, this option is only mentioned once in the plan (quoted above). The potential environmental impacts of leaving the cables in situ does not appear to have been discussed (for example, in 7.9 fDEMP, Section	As discussed in **Volume I, Chapter 2: The Scheme [APP-054]** and the **Framework DEMP [APP-198]**, the mode of decommissioning for the Grid Connection Cables and On-Site Cables will be dependent upon government policy and good practice at that time and therefore will be determined closer to the decommissioning phase commencing. The method of cable decommissioning will be confirmed in the detailed DEMP produced by the appointed contractor to be approved by the City of Doncaster Council as relevant planning authority prior to the decommissioning phase commencing which is secured by Requirement 18 in Schedule 2 of the **Draft DCO [APP-220]**. Requirement 18 of Schedule 2 in the Draft DCO has been updated to include a requirement for consultation with the Environment Agency in the discharge of the detailed DEMP.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
3.1, tables 4 and 15). Cables left in situ might degrade over time and could potentially have a negative impact on controlled waters.	
GWCL Permitting Guidance The proposed development includes stripping and reuse of topsoil and subsoil on the site (ES Vol. I, Section 2.7.21). This is anticipated to include "stockpiling, respreading, and ameliorating the soils" (7.10 fSMP, Section 2.1.2). Soil movement and storage, especially for reuse, and amelioration, may require environmental permits. The applicant must ensure that they are aware of permitting requirements for these activities. We recommend that the Environment Agency's National Permitting Service is contacted at a very early stage so that this can be understood and allowed for in work plans. At decommissioning, the applicant proposes to remove hardstanding and reinstate the soil profile using stockpiled site won soils (ES Vol. I, Section 2.9.4). This work must also be done under appropriate permits. Stockpiling of site won materials either during construction (indicated in 7.10 fSMP, Section 4.7.2), or for the life of the project, might be classed as storage of waste. 6.3 App. 9-3 WFD, Section 5.1.3, Table 8 outlines other scheme components scoped into the assessment. HDD and associated catch pits are identified. The applicant proposes to manage groundwater ingress by pumping and treating. Dewatering, or other groundwater activities, might need a permit or to be registered as an exemption. We recommend that this is confirmed with the Environment Agency at the earliest opportunity so that there is sufficient time to acquire any necessary permissions.	The **Framework SMP [APP-199]** relates to the agricultural soils within the Order limits. These soils are considered clean, naturally occurring materials and there is no intention to discard these agricultural soils off-site. For these reasons it was not considered that the soils meet the CL:AIRE DoW:CoP. Prior to construction commencing the appointed contractor will ensure all the necessary consents/ permits for construction activities are in place.
Protection of Controlled Waters – BESS Site & Fire Risk **Drainage design** The drainage design document (6.3 App. 9-4 Drainage) only considers the BESS Area and On-Site Substation, stating these are the only impermeable areas within the Order Limits during the operational phase (6.3 App. 9-4, Section 1.1.7). We understand that there will also be site offices (6.3 App. 9-4, Section 9.1.1: "Foul drainage from offices on site will be directed to an on-site cesspit"). We assume that some part of the office area will be impermeable, and this may need to be considered in the drainage strategy. Rows of BESS containers "will be mounted on a concrete foundation" (7.16 BESS, Section 2.1.25) placed on gravel-filled attenuation basins, and fire water runoff will be contained in these (6.3 App. 2-2 BESS, Section 1.1.4). Between each row will be an impermeable road, raised slightly above ground level (6.3 App. 9-4 Drainage, Section 3.1.3). As such, the whole BESS compound will be impermeable (6.3 App. 9- 3 WFD, Section 3.3, Table 2). Attenuation basins must therefore have capacity to store runoff from the roads, in addition to the BESS units they serve. 7.16 BESS, Section 2.1.25 states that "other types of foundations (for example ground screws, metal piles, or compacted stone/gravel) may be used depending on the local geology or land quality". If ground screws or piles are used, they must not affect the impermeable nature of the attenuation basins.	The buildings proposed as part of the On-Site Substation have been considered within **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]**. The only other building proposed as part of the Scheme is the Operation and Maintenance Hub in Field NW08 of the Solar PV Site. This is an existing building which is being repurposed and, therefore, does not introduce additional hardstanding. The surrounding area also comprises Solar PV Panels which will promote the current rates of runoff infiltration. The Drainage Strategy calculations for the BESS Area have assumed that the roads and areas between the units is impermeable. This has not been explicitly stated, however, Plate A1 in Annex A of **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]** shows the Information Drainage Model layout which includes the roads and areas between the BESS Containers. The impact of other foundation types will be considered at detailed design. The impermeability of the basin liner will be maintained.
Site Characterisation 7.16 BESS, Section 3.4.1 states: "the detailed BSMP will include a site plan that shows all sensitive receptors within a 1 km radius of the Order limits that could be affected by a fire". This should include geology and hydrogeology. It would have been useful for it to be included in the framework plan.	Section 4.5 of the **Framework BSMP [APP-205]** specifies that at the detailed design stage in alignment with 2024 NFCC draft guidelines (2024), a BESS system and site-specific Plume Analysis study will be conducted by the Applicant post consent once the specific battery technology to be used for the Scheme is confirmed. The site-specific Plume Analysis study will assess the environmental impact of an incident to sensitive receptors within a 1 km radius.
Clean agent and aerosol fire suppression systems The applicant refers to clean agent or aerosol fire suppression systems (7.16 BESS, Section 2.1.30 j.), specifically proposing to prohibit their use. If these products contain PFAS or other harmful chemicals, we are strongly against their use anywhere in the scheme.	The Applicant can confirm that any fire suppression system integrated into the BESS Containers will not contain Per- and polyfluoroalkyl substances (PFAS) (i.e. clean agent or foam systems will not be considered). Aerosols are potassium based (less harmful) but will equally have no

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
	capacity to stop thermal runaway propagation and increase explosion risks within BESS Containers.
Water consumption for fire water tanks Management of fire water is discussed in 7.16 BESS, Section 3.2. The applicant proposes to fill the fire water tanks by potable water mains connected to the tanks (Section 3.2.1). We recommend early consultation with the water supplier to ensure that the required volumes are available. This includes allowance for refill following a fire event.	The Applicant confirms that all requisite assurance over the continuity of water supply will be obtained. Water storage tanks, water tank checks/maintenance and SYFRS discharge requirements will meet all UK Fire and Rescue Service regulations as specified in the **Framework BSMP [APP-205].**
Water Resources The Environmental Statement chapters include details of sources of supply and permitting requirements for some activities which require consumptive uses of water. Some are unspecified which may pose some risks. **Water Resources Licensing** The Consents and Agreements Position Statement document (EN10152/APP/3.3) does not appear to include the intention to disapply any Water Resources licensing requirements. It is unlikely that the Environment Agency would agree to this if any determination of impacts is required from the licensing process (this can be identified during Pre-application for a licence). In other cases, such as low risk impoundment and dewatering guidance, there are already criteria which qualify where a licence is not required already identified above or by the applicant.	The Applicant will undertake any early engagement required to secure necessary preconstruction permits and licences, and notify the relevant water undertaker of construction activities. The Applicant includes the licences expected to be required for groundwater pumping and dewatering, and water discharge activities in Table 3-1 of the **Consents and Agreements Position Statement [APP-017]**.
Operational Issues The Environmental Statement describes ongoing water access required from mains water connections for future panel cleaning. We recommend early engagement with the water undertaker to ensure security of supply.	The WMP, which is listed as a required plan within the **Framework CEMP [APP-196]**, will include water requirements for the uses described and specify the sources of supply. The production of a detailed CEMP, including WMP, is secured by Requirement 11 of the **Draft DCO [APP-220]**. The Applicant will engage with the water undertaker during the preparation of the WMP.
Construction Issues – Dewatering The Environmental Statement describes the potential need for abstraction licences for the purpose of dewatering where (shallow) GW is encountered for example in the entry and exit pits over pumping at watercourse crossings (9.8.63-64). We agree that it is possible that activities may be exempt or considered low risk if quantities are small, timescales short and if the water is returned to surface water or to ground and deemed non-consumptive. However, timescales for licence determinations otherwise should not be underestimated and the use of the Environment Agency Pre-App service is recommended well in advance of commencement in order to avoid risking delays.	These comments are noted, and the Applicant will undertake any early engagement required to secure necessary preconstruction permits and licences, and notify the relevant water undertaker of construction activities.
Impoundment licences The Environmental Statement describes the potential need for impoundment licences for the purpose of laying cables (9.8.63). This is inferred to relate to the dewatering/over-pumping/fluming of watercourses where in channel works or crossings are required. We are pleased to see this considered and the early use of the Environment Agency Pre-App advice service is recommended. However, we would also encourage the applicant to evaluate the criteria for exemptions and low risk impoundment guidance found on our website here: Check if you need a licence to impound water - GOV.UK	
Horizontal Directional Drilling The Framework Construction Environmental Management Plan (CEMP) specifies that mains water will be used for supplying water for bentonite clay mixing for drilling fluids. We recommend early engagement with the water undertaker to ensure security of supply.	
Other consumptive uses of water during construction	As discussed in Paragraph 2.7.58 in **Volume I, Chapter 2: The Scheme [APP-054]**, the Applicant anticipates that the Scheme would obtain the water required for the Operations and

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Vehicle washing and other cleaning water is noted in GPP 13 in the context of pollution risk however the source of supply for this use is not specified in the ES or subsequently in the CEMP. Suitable facilities for concrete wash water are described in the ES (9.8.52) and the CEMP in the context of pollution risk however the source of supply for this water use is not specified. The ES describes an adequate water supply on the site required for effective dust/particulate matter suppression/ mitigation, using non potable water where practicable and appropriate. The source of supply for this high consumption use is not specified. Section 9.8.5 of the Environmental Statement describes a Water Management Plan (WMP) that will support the final detailed CEMP and provide greater detail regarding the mitigation to be implemented to protect the water environment from adverse effects during construction. We would request that a more comprehensive and focussed Water Supply Strategy is included in this document which where possible quantifies water requirements for the uses described above and specifies the sources of supply considered. This will help to identify obstacles or potential restrictions and to evaluate any (further) mitigation required. This will also help to expedite the formal permitting determination process closer to commencement and help to avoid delays.	Maintenance Hub and temporary facilities from an existing water supply from a nearby farm with a separate meter installed. However, to present a worst case at construction it is assumed that this would not be available until the operation and maintenance phase of the Scheme and that all water would be imported by road from nearby licenced water abstraction sources and stored on site in IBC or similar. The water supplies detailed will be used for all activities during the construction phase of the Scheme. The WMP, which is listed as a required plan within the **Framework CEMP [APP-196]**, will include water requirements for the uses described above and specify the sources of supply. The production of a detailed CEMP, including WMP, is secured by Requirement 11 of the **Draft DCO [APP-220]**.
Climate change and Drought The appendix 6-2 Climate Change Risk Assessment makes provision for the effects of increased temperatures, low rainfall and Drought conditions. If water supply is intended to come from surface water sources of supply during these conditions, (especially for purposes such as dust suppression which is likely to have highest demand during prolonged dry weather) it is likely that licences will be restricted by low flow cessation conditions. Mitigation should be considered for on site storage of water to buffer this risk. In the absence of a full consideration of sources of water supply, this has not therefore been considered in this assessment.	Paragraph 9.4.18 of **Volume I, Chapter 9: Water Environment [APP-061]** details that that the Scheme would obtain the water required for the Operations and Maintenance Hub and temporary facilities from an existing water supply from a nearby farm with a separate meter installed which are not considered to be affected by periods of increased temperatures, low rainfall, and drought conditions. In order to present a worst case at construction it is assumed that this would not be available until the operation and maintenance phase of the Scheme and that all water for construction would be imported. Water will be transported to the Order limits by road from an existing nearby licenced water abstraction source and stored on site in IBC, or similar. During construction, the contractor will monitor weather forecasts on a monthly, weekly, and daily basis, and plan works accordingly based on anticipated weather conditions.
Environmental Permits **Water Resources** The Consents and Agreements Position Statement document (EN10152/APP/3.3) does not appear to include the intention to disapply any Water Resources licensing requirements. It is unlikely that the Environment Agency would agree to this if any determination of impacts is required from the licensing process (this can be identified during Pre-application for a licence). In other cases such as low risk impoundment and dewatering guidance, there are already criteria which qualify where a licence is not required already identified above or by the applicant.	The Applicant will undertake any early engagement required to secure necessary preconstruction permits and licences, and notify the relevant water undertaker of construction activities. The Applicant includes the licences expected to be required for groundwater pumping and dewatering, and water discharge activities in Table 3-1 of the **Consents and Agreements Position Statement [APP-017]**.
Flood risk activity permit (FRAP) requirements The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place: • on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal) • on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission	The Applicant has provisionally agreed a form of protective provisions for the benefit of the Environment Agency which are included within the **Draft DCO [APP-220]** as Part 5 of Schedule 14. Subject to the resolving of outstanding technical matters, the Applicant understands that the parties will be in a position to agree disapplication under the Environmental Permitting (England and Wales) Regulations 2016.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
For further guidance please visit https://www.gov.uk/guidance/flood-risk-activitiesenvironmental-permits or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environmentagency.gov.uk. The Applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.	
<u>Dewatering – abstraction licence requirements</u> Dewatering is the removal/abstraction of water (predominantly, but not confined to, groundwater) in order to locally lower water levels near the excavation. This can allow operations to take place, such as mining, quarrying, building, engineering works or other operations, whether underground or on the surface. The dewatering activities on-site could have an impact upon local wells, water supplies and/or nearby watercourses and environmental interests. This activity was previously exempt from requiring an abstraction licence. Since 1 January 2018, most cases of new planned dewatering operations above 20 cubic metres a day will require a water abstraction licence from us prior to the commencement of dewatering activities at the site. More information is available on gov.uk: https://www.gov.uk/guidance/watermanagement-apply-for-a-water-abstraction-or-impoundment-licence#apply-for-alicence-for-a-previously-exempt-abstraction.	This comment is noted and the Applicant will undertake any early engagement required to secure necessary preconstruction permits and licences.
<u>CL:AIRE Definition of Waste: Development Industry Code of Practice (DoWCoP)</u> CL:AIRE DoWCoP guidance can be found via the following link: http://www.claire.co.uk/projects-and-initiatives/dow-cop/28-framework-andguidance/111-dow-cop-main-document. The DoWCoP sets out the lines of evidence that are needed to demonstrate that the excavated materials are not or have ceased to be waste. These are based on four factors: • Protection of human health and the environment (acceptable risk assessment of pollution). • Suitability for use without further treatment (no further processing and/or treatment, as demonstrated by a specification and a site-specific risk assessment including chemical, geotechnical properties and biological aspects). • Certainty of Use (outlined in the Remediation Strategy and Material Management Plan). • Quantity of Material (outlined in the Remediation Strategy and Material Management Plan). To demonstrate the factors a Materials Management Plan (MMP) needs to be produced to ensure all factors are considered and the correct determination is made. A Verification Plan needs to be set out in the MMP and must identify the recording method of materials being placed, as well as the quantity of materials to be used. It should also contain a statement on how the use of the materials relates to the remediation or design objectives. In general, any material that has to be treated in order to render it suitable for its intended use is considered to be a waste and waste controls apply. To demonstrate this to the Environment Agency's satisfaction, the processes and requirements detailed in the DoWCoP need to be followed in full. The requirements include: • desktop study of the site • conceptual modelling of the site(s) concerned • site investigation details (if appropriate) • and any details of contamination (if relevant) Regardless of whether the site is contaminated or not there the following documents should be produced: • Risk Assessments • Options Appraisal Report	As outlined in the **Framework CEMP [APP-196]** "*If required, a Materials Management Plan (MMP) would be developed under the Contaminated Land: Applications in Real Environments (CL:AIRE) Definition of Waste: Development Industry Code of Practice by the appointed construction contractor to support the reuse of excavated materials, minimise off-site disposal, and to demonstrate the necessary lines of evidence to support the proper reuse/off-site disposal of materials and ensure compliance with regulatory guidance*."

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
• Remediation Strategy (Contaminated soils) or Design Statement (Clean naturally occurring soils) • Materials Management Plan • Verification Report once the work is completed The decision to use the CL:AIRE DoWCoP is the responsibility of the holder of the materials. The project manager should collate all relevant documents; permissions, site reports, MMP etc. and consult with an independent Qualified Person (QP) to confirm that the site meets the requirements and tests for use of the DoWCoP. The Qualified Person must review the documentation and let the developer know that a Verification Report will be required before signing a Declaration. If the site meets the tests that materials are suitable for re-use, certain to be re-used, are not excessive in volume and pose no risk to the environment or harm to human health then the QP can make a formal Declaration to CL:AIRE. The formal Declaration must be submitted to CL:AIRE and the Environment Agency by a Qualified Person before any excavation activities or transfer of materials occurs. In these circumstances the QP is meeting the requirements of the Regulator to ensure appropriate environmental and human health protection is in place for the development to go ahead.	
Materials not used in accordance with the DoWCoP process in full may be deemed waste and will require a relevant permit for deposit. Materials illegally deposited or deposited at inappropriate sites may be subject to relevant landfill taxes, payable by all parties. Only robust due diligence is a defense against joint liability. For clarification, it is important to note that DoWCoP declarations cannot be made retrospectively. In addition to this if you wish to re-use material under the 'site of origin scenario' and this material has previously been imported to that site as waste without authorisation, for example a historical illegal deposit, then it does not originate at that site. It is not site derived material, and you cannot use DoWCoP site of origin scenario for this activity, you will require an appropriate waste authorisation such as an environmental permit.	
Control of emissions from Non-Road Going Mobile Machinery (NRMM) Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority. This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support LPAs and developers in improving and maintaining local air quality standards and support their net zero objectives. We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority. The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit. Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should	There are no Air Quality Management Areas located within 5km of the Order Limits. As reported in **Volume I, Chapter 14: Other Environmental Topics [APP-066]**, baseline pollutant concentrations within and surrounding the Order limits are very low. Emissions from non-road mobile machinery (NRMM) have been considered but not specifically assessed. It is very unlikely that NRMM vehicles to be utilised in construction would increase ambient NO_X and PM above statutory limits and measures to control NRMM emissions will be included within the Dust Management Plan (DMP), the production of which is mandated by the **Framework CEMP [APP-196]**. The measures detailed within the DMP will be proportionate to the risk level. City of Doncaster Council does not currently have a register for NRMM.

Comments from Relevant Representation – Environment Agency	Applicant's Response to Relevant Representation
be able to state or confirm the use of such machinery in their application to which this then can be applied.	

Table 2-6 Applicant's Response to Relevant Representations – National Grid Electricity Transmission plc [RR-004]

Comments from Relevant Representations- National Grid Electricity Transmission plc	Response to Relevant Representation
Relevant Representation of NGET ("National Grid Electricity Transmission Plc") in respect of the Fenwick Solar Farm DCO (the "Project") Introduction This relevant representation is submitted on behalf of National Grid Electricity Transmission Plc ("NGET") in respect of the Project, and in particular NGET's existing and proposed infrastructure and land interests which will be located within and in close proximity to the proposed Order Limits. The Project proposes to construct a solar farm and Battery Energy Storage System (BESS), connecting into NGET's existing Thorpe Marsh 400kV substation. The Applicant is seeking temporary and permanent rights over several plots owned by, or containing, NGET rights and assets including those shown on sheets 2, 4, 8, 9 & 10 of the Land Plans and referenced in the draft DCO as Works Number 1, 4(a), 4(b), 4(c), 5, 6, 8 and 9. NGET's Statutory Duties As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. NGET has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits. Additionally, NGET must protect its future proposed infrastructure.	The Applicant notes this comment.
NGET will therefore 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 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. Further discussion and agreement with the Applicant is required in relation to the impact on its apparatus and rights.	The Applicant and National Grid Electricity Transmission Plc (NGET) have agreed a form of bespoke protective provisions that have been included as Part 7 of Schedule 14 to the **Draft DCO** at Deadline 1. NGET has withdrawn its objection to the Scheme.
Existing NGET Apparatus NGET owns and operates the following assets that are located within and in close proximity to the Order Limits for the Project. These assets form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets impacted are as follows: • Thorpe Marsh 275kV Substation • Thorpe Marsh 400kV Substation • Associated overhead and underground apparatus including cables • Overhead Lines: o ZZG 275kV OHL Thorpe Marsh – West Melton 1 Thorpe Marsh – West Melton 2 o ZZH 400kV OHL Eggborough – Thorpe Marsh o ZZI 400kV OHL Drax – Keadby – Thorpe Marsh o 4ZH 400kV OHL Brinsworth – Thorpe Marsh 1 Brinsworth – Thorpe Marsh 2 o 4VH 400kV OHL Drax – Keadby – Thorpe Marsh • Cable Apparatus: o Thorpe Marsh – West Melton 1 o Thorpe Marsh – West Melton 2	The Applicant notes this comment and the identification of NGET's assets.

Comments from Relevant Representations- National Grid Electricity Transmission plc	Response to Relevant Representation
Future NGET Apparatus NGET must ensure adequate projection for its future projects both in terms of protection for future assets and future land and rights for the delivery of these projects. Overarching National Policy Statement (NPS) for Energy EN-1 states that "[t]o support the achievement of the transition to net zero, government is accelerating the co-ordination of the development of the grid network to facilitate the UK's net zero energy generation development" (para 4.11.3). This is reflected in the NPS for Renewable Energy Infrastructure EN-3 which states at paragraph 2.8.34 that "a more co-ordinated approach to offshore-onshore transmission is required." In line with good practice and the new policy considerations in the updated Energy NPS', particularly EN-5, which requires that "2.14.2 the construction planning for the proposals has been co-ordinated with that for other similar projects in the area on a similar timeline;", NGET will co-operate on co-ordination in respect of any future projects and seek to develop co-ordination and co-operation in the same localities with regards to those future projects.	The Applicant notes this comment.
Protection of NGET Assets NGET will require Protective Provisions to be included within the draft Development Consent Order (the "Order") for the Project to ensure that assets existing at the time of construction of the Project are adequately protected and to ensure compliance with relevant safety standards. NGET also requires that the Protective Provisions include protection for any future assets. The Awel Y Mor DCO provides a precedent for the protection of future assets via Protective Provisions. NGET is liaising with the Applicant in relation to such Protective Provisions. Accordingly, NGET has not appended the version of the Protective Provisions it requires to be included in the Order to this Relevant Representation. However, NGET will submit these at Written Representation Stage, if not agreed between the parties by that point, with an explanation of any outstanding issues. NGET requests that the Applicant continues to engage with it in relation to how the Applicant's works pursuant to the Order (if made) will ensure protection for those proposed NGET assets, along with facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations. NGET will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions.	The Applicant notes this comment and refers to its response above regarding a bespoke set of protective provisions and asset protection agreement, as requested by NGET.
Compulsory Acquisition Powers in respect of the Project Where the Applicant seeks powers of compulsory acquisition over NGET land or rights, the Protective Provisions must require that the Applicant obtain NGET's consent to any compulsory acquisition of any such land or rights. NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with any NGET projects identified during the Examination process, and as negotiations continue, but in the meantime will continue to liaise with the Project with a view to reaching a satisfactory agreement during the Examination process and will keep the Examining Authority updated in relation to these discussions.	The Applicant notes this comment and refers to its response above regarding a bespoke set of protective provisions and asset protection agreement, as requested by NGET.
NGET notes that the Thorpe Marsh National Grid Substation has been included within the Order limits for the purposes of Work No. 4 (works to connect into the substation) and this land is subject to the compulsory acquisition of permanent rights. It is noted that under the DCO, NGET will have the benefit of the Order in relation to these works. Further, there is a connection agreement in place between the Applicant and National Grid Electricity System Operator Limited and as is set out in the Grid Connection Statement submitted with the DCO Application: "NGET have confirmed that a bay within the Existing National Grid Thorpe Marsh Substation will be made available. All works to the Existing National Grid Thorpe Marsh Substation to accommodate the Scheme connection for the Grid Connection Corridor option would be undertaken by National Grid and are anticipated to include the installation of infrastructure to facilitate the efficient transmission of power	The Applicant notes this comment and refers to its response above regarding a bespoke set of protective provisions and asset protection agreement, as requested by NGET. These protective provisions appropriately address the compulsory purchase powers of the Scheme and how these apply to NGET's land and assets. The Applicant therefore considers this matter is resolved given the conclusion of negotiations on those protective provisions.

Comments from Relevant Representations- National Grid Electricity Transmission plc	Response to Relevant Representation
onto the electricity transmission network. All infrastructure within the Existing National Grid Thorpe Marsh Substation would remain under National Grid's control." As the works will be undertaken by NGET and the Applicant will obtain all required rights through the Connection Agreement, the compulsory acquisition of rights over this land is not required and it should be removed from the Order limits.	

Table 2-7 Applicant's Response to Relevant Representations – National Highways [RR-005]

Comments from Relevant Representations– National Highways	Response to Relevant Representation
National Highways has been appointed by the Secretary of State for Transport as a strategic highway company and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). In relation to the Fenwick Solar Project, our principal interest is in safeguarding the A1, M18 and A1. Although the SRN is outside the Order Limits, it is understood that construction traffic will be routed via the SRN. As such, we reserve the right to make written representations if an impact of construction traffic on the SRN is identified, or if changes to the application are made which result in other impacts to the SRN. Unique Reference number is: (Redacted). National Highways' principal interest is in safeguarding the A1, M18 and M62. Although the SRN is outside the Order Limits, the traffic impact of the site could be controlled through an appropriate CTMP and DEMP. We would hope to agree the following with the applicant, within the Draft DCO (EN010152-000045-3.1)	The Applicant accepts that some use of the Strategic Road Network (SRN) will be required by vehicles during the construction phase. Information provided within Table 16 of the **Transport Assessment [APP-179]** demonstrates that across the day, low volumes of traffic are anticipated to use SRN links within the Study Area, namely the M18, M180, and M62. Based on the initial assessment of routes likely to be used by vehicles during the construction phase, it was considered that the number of vehicles potentially using the A1 would be negligible. Therefore, links on the A1 were not included in the Study Area and, subsequently, the Scheme is not anticipated to impact upon the safe and efficient operation of the SRN. The highest volume of vehicles using an SRN link is predicted to occur on the M62 west of Junction 34 during the hours of 06:00–07:00 and 19:00–20:00, where 44 two-way construction worker vehicle movements are predicted. This constitutes an AM increase in traffic of 1.5% and a PM increase of 2.1%. As the volume of traffic expected during the network peak hours (e.g. 08:00–09:00 and 17:00–18:00) are zero, the Applicant has not undertaken assessments at any SRN junctions. Impacts on the SRN during the construction and decommissioning phases will be mitigated through measures included in the detailed CTMP and detailed DEMP.
1) Framework CTMP / Requirement 13 for CTMP – There are currently uncertainties relating to construction phase and therefore the potentially impacts cannot be fully assessed. The final CTMP produced to satisfy Requirement 13 will need to include additional information and ensure that construction is either appropriately controlled to avoid impact at the SRN or appropriate mitigation measures are included.	The Applicant considers the assessment undertaken and presented in **Volume I, Chapter 13: Transport and Access [APP-065]** to be robust. Where there are uncertainties regarding the construction phase, appropriate assumptions have been made to ensure a worst-case scenario has been assessed. A **Framework CTMP [APP-206, APP-207]** has been submitted as part of the Application and include measures to secure and control traffic impacts from the Scheme on the SRN and local road networks during the construction phase. In addition, the **Framework CTMP [APP-206, APP-207]** ensures mitigation such as Heavy Good Vehicle routing and staff shift timing is secured to minimise the impact of the Scheme. The **Framework CTMP [APP-206, APP-207]** will be developed into a detailed CTMP by the appointed contractor and, in accordance with Requirement 13 of the **Draft DCO [APP-220]**, submitted and approved by the relevant planning authority in consultation with National Highways prior to the construction phase commencing. This will be substantially in accordance with the **Framework CTMP [APP-206, APP-207]** and is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**.
2) Requirement 18 for a DEMP – The timescales as set out in the Requirement need clarifying as to whether a DEMP needs to be agreed before the start of decommissioning. The content of the submitted DEMP under this Requirement should by reviewed by National Highways (or any subsequent national highway authority) and should include an appropriate assessment in line with the current policies of the time. Therefore, to expect this assessment to be substantially in line with current framework DEMP may not be appropriate. It should also include a traffic management section in line with the final agreed CTMP (adjusted for the guidance at the time of submission). It is not clear that all these issues will be covered given the framework DEMP.	A **Framework DEMP [APP-198]** has been submitted as part of the Application and includes measures to control traffic impacts from the Scheme on the SRN and local road networks during the decommissioning phase. This will be developed into a detailed DEMP by the appointed contractor and discussed with relevant stakeholders, including National Highways (or its successor at the time), prior to the decommissioning phase commencing. The detailed DEMP will be substantially in accordance with the **Framework DEMP [APP-198]** and is secured by Requirement 18 in Schedule 2 of the **Draft DCO [APP-220]**. In relation to National Highways' concern around timescales, the Applicant notes that the wording of this Requirement states that the detailed DEMP must be submitted 'for approval' which indicates that decommissioning cannot take place before the detailed DEMP is agreed with the relevant planning authority. Following consideration of National Highways' comments regarding the **Framework DEMP [APP-198]**, the Applicant has updated the Framework DEMP for Deadline 1 of Examination to ensure

Comments from Relevant Representations– National Highways	Response to Relevant Representation
	that this document specifically refers to consultation with National Highways as part of the preparation of the detailed DEMP.

Table 2-8 Applicant's Response to Relevant Representations – Natural England [RR-006]

Comments from Relevant Representation– Natural England [RR-006]	Response to Relevant Representation
Summary of Natural England's Advice Natural England considers that the Applicant has provided insufficient evidence and is not yet satisfied that that the following issues have been addressed; • Internationally designated sites o Potential loss of functionally linked land (FLL) for SPA / Ramsar birds. o Potential noise disturbance during construction to FLL for SPA / Ramsar birds. o Nightjar Foraging Distances o In-combination impacts • Biodiversity Net Gain o Statutory Biodiversity Metric o Assessment Boundary o Watercourse Baseline Data o Trading Rules • Protected Species o Badger exclusion zones	The Applicant notes this comment and provides full responses to the detailed advice section of Natural England's' Relevant Representation below.
Part I: Summary and Conclusions of Natural England's advice 1.1 Natural England's advice in these relevant representations is based on information submitted by Fenwick Solar Project Limited ('the Applicant') in support of its application for a Development Consent Order ('DCO') in relation to Fenwick Solar Farm ('the project'). 1.2 Part I of these representations summarises what Natural England considers the main issues1 to be in relation to the DCO and indicate the principal submissions that it wishes to make at this point. Natural England will develop these points further as appropriate during the examination process. It may have further or additional points to make, particularly if further information about the project becomes available. 1.3 Our comments are set out against the following sub-headings which represent our key areas of remit: • Internationally and nationally designated sites • Biodiversity net gain • Protected species	The Applicant notes this comment and provides full responses to the detailed advice section of Natural England's' Relevant Representation below.
1.4 Our comments are flagged as red, amber, yellow, green or grey: Red are those where there are fundamental concerns which it may not be possible to overcome in their current form. Amber are those where further information is required to determine the impacts of the project and allow the Examining Authority to properly undertake its task and/or where further information is required on mitigation/compensation proposals in order to provide a sufficient degree of confidence as to their efficacy. Yellow are those where Natural England does not agree with the Applicant's position or approach. We would ideally like this to be addressed but are satisfied that for this particular project it is unlikely to make a material difference to our advice or the outcome of the decision-making process. However, we reserve the right to revise our opinion should further evidence be presented. It should be noted by interested parties that whilst these issues/comments are not raised as significant concerns in this	The Applicant notes this comment and provides full responses to the detailed advice section of Natural England's' Relevant Representation below. The Applicant will continue to engage with Natural England during and after the Examination to discuss the Scheme. A signed SoCG between the Applicant and Natural England has been prepared and submitted for Deadline 1 of Examination. All matters included in the SoCG regarding the Application have been agreed between the Applicant and Natural England.

Comments from Relevant Representation– Natural England [RR-006]	Response to Relevant Representation
instance, it should not be understood or inferred that Natural England would be of the same view in other cases or circumstances. Green are those which have been successfully resolved (subject always to the appropriate requirements being adequately secured). Grey are notes for Examiners and/or competent authority.	
1.5 Natural England has been working with AECOM on behalf of Fenwick Solar Project Limited to provide advice and guidance on the Fenwick Solar project since May 2024 through Natural England's Discretionary Advice Service (DAS). We note that Natural England's most recent work with the Applicant through DAS was on 31 October 2024, and elements of the advice were unable to be incorporated into the application due to the submission immediately following this. Natural England will be happy to attend meetings with the Applicant, or engage through written advice, with a view to progressing Statements of Common Ground as part of the Examination process and to try to resolve any outstanding issues ahead of the Examination.	The Applicant appreciates the engagement with Natural England undertaken to date and will continue to engage during and after the Examination to discuss the Scheme. A signed SoCG between the Applicant and Natural England has been prepared and submitted for Deadline 1 of Examination. All matters included in the SoCG regarding the Application have been agreed between the Applicant and Natural England.
1.6 Part I of these representations provides an overview of the issues and a summary of Natural England's advice. Section 2 identifies the natural features relevant to this application. Section 3 summarises Natural England's overall view of the application and the main issues which it considers need to be addressed by the Examining Authority. 1.7 Part II of these representations sets out all the issues which remain outstanding, and which Natural England advises should be addressed by Fenwick Solar Project Limited and the Examining Authority as part of the examination process in order to ensure that the project can properly be consented. 1.8 Natural England will continue discussions with AECOM on behalf of Fenwick Solar Project Limited. to seek to engage to ensure all issues are considered appropriately along with any future matters that may arise.	The Applicant notes this comment and provides full responses to the detailed advice section of Natural England's' Relevant Representation below. The Applicant appreciates the engagement with Natural England undertaken to date and will continue to engage during and after the Examination to discuss the Scheme. A signed SoCG between the Applicant and Natural England has been prepared and submitted for Deadline 1 of Examination. All matters included in the SoCG regarding the Application have been agreed between the Applicant and Natural England.
1.9 The Examining Authority may wish to ensure that the matters set out in these relevant representations are addressed as part of the Examining Authority's first set of questions to ensure the provision of information early in the examination process. 1.10 Due to the extensive documentation submitted for review within the consultation period, in addition to resource constraints within the team, Natural England has prioritised detailed review of key documents and associated figures, including Chapter 8 Ecology; Chapter 9 Water Environment; Chapter 10 Landscape and Visual Amenity; 7.7 Framework Construction Environmental Management Plan; 7.8 Framework Operational Environmental Management Plan; 7.11 Biodiversity Net Gain Assessment; and 7.12 No Significant Effect Report. Therefore, we may have additional comments to make in our Written Representations. 1.11 Natural England has no comments to make on the draft Development Consent Order (DCO) at this stage.	The Applicant notes the documents reviewed by Natural England.
2.The natural features potentially affected by this application 2.1 Please note that for each of the below issues, we have included the Natural England 'key issue' reference used in the detailed advice section (Part II), to make it easier to cross-reference where necessary. This reference begins with 'NE' and then includes a number; and will be highlighted in bold for each issue.	The Applicant notes this comment and provides full responses to the detailed advice section of Natural England's' Relevant Representation below.
Internationally designated sites 2.3 Our position regarding impacts on internationally designated sites is summarised below. Further detail on our reasoning for this is given against each impact pathway within Part II.	The Applicant has provided a full response to NE4 which provides detailed comments regarding internationally designated sites in the rows below.

Comments from Relevant Representation– Natural England [RR-006]	Response to Relevant Representation
2.4 On the basis of the information submitted, Natural England is not yet satisfied for 'amber' issues identified in the text below. We advise that there is currently not enough information to rule out the likelihood of significant effects. Uncertainties remain relating to effects that may become significant when considered in combination with other plans or projects: • In-combination impacts on international designated sites (construction and operation) ('amber') [NE4]	
2.5 Natural England has also noted a number of 'yellow' issues in relation to the Humber Estuary designated sites. As stated in section 1, we would ideally like these to be addressed, but we are satisfied that for this particular project it is unlikely to make a material difference to our advice or the outcome of the decision-making process. Please find a summary of each 'yellow' issue below, and refer to Table 1 for further details: • Potential loss of functionally linked land (FLL) for the Humber Estuary SPA / Ramsar (construction and operation) ('yellow') [NE1] • Noise and visual disturbance during construction to FLL for the Humber Estuary SPA / Ramsar (construction) ('yellow') [NE2] • Nightjar foraging distances for the Thorne & Hatfield Moors SPA ('yellow') [NE3]	The Applicant has provided a full response to NE1, NE2 and NE3 which provides detailed comments regarding internationally designated sites in the rows below.
Nationally designated sites 2.6 We note that the Humber Estuary Site of Special Scientific Interest (SSSI) and Thorne, Crowle and Goole Moors SSSI nationally designated site features that are affected by this proposal are broadly the same as the internationally designated site features. 2.7 Please refer to the points in the 'Internationally designated sites' section for all 'amber', 'yellow' and 'grey' issues, that also apply to the Humber Estuary SSSI and Thorne, Crowle and Goole Moors SSSI.	The Applicant has provided a full response to NE1, NE2 and NE3 which provides detailed comments regarding internationally designated sites in the rows below.
Biodiversity Net Gain 2.8 Natural England's position regarding provision of Biodiversity Net Gain (BNG) is summarised below. Further detail on our reasoning for this is given in Part II: 1• It is recommended that the original excel file(s) for the BNG metric is shared as part of the submitted documents ('grey') (NE5A). 2• Natural England advises that the biodiversity baseline included within the metric is based upon all land within the development's order limits (red line boundary). This includes all areas required for environmental mitigation ('grey') (NE5B). 3• As outlined in the Statutory Biodiversity Metric Guide, watercourses (other than ditches and culverts) should be surveyed by conducting a river condition assessment (RCA) and this person should be RCA trained and accredited. It is not clear in the Biodiversity Net Gain Assessment whether this has been followed ('grey') (NE5C). 4• It is noted that the trading rules are not met for 'Urban – Open Mosaic Habitat of Previously Developed Land' (OMH). Comments on the use of the BNG metric for this development are provided in Table 1 ('grey') [NE5D]. 5• We recommend that the target increase in BNG is secured across all biodiversity unit types ('grey') [NE5E]	The Applicant has provided a full response to NE5 which provides detailed comments regarding BNG in the rows below.
Protected species 2.9 Natural England's position regarding protected species is summarised below. Further detail on our reasoning for this is given in Part II:	The Applicant has provided a full response to NE6 which provides detailed comments regarding Badger in the rows below.

Comments from Relevant Representation– Natural England [RR-006]	Response to Relevant Representation
• Natural England advises that exclusion zones for badger are set at 30m for all heavy plant, Horizontal Drilling and excavations ('amber'). [NE6].	
Natural England's overall conclusions 3.1 Natural England's advice is that there are a small number of matters which have not been resolved satisfactorily as part of the pre-application process that must be addressed by Fenwick Solar Project Ltd and the Examining Authority as part of the Examination and consenting process before development consent can be granted, as summarised in Section 2 above and outlined in further detail in Part II below. 3.2 There are several additional issues where Natural England does not agree with the applicant's approach which ideally should be addressed. However, these issues are unlikely to make a material difference to our advice or the outcome of the decision-making process. 3.3 There are also a number of notes for the Examiner and/or the competent authority included in the response. 3.4 The specific issues and comments in relation to each are detailed in Part II.	The Applicant notes the conclusion received from Natural England and provides full responses to the detailed advice section of Natural England's' Relevant Representation below. The Applicant has responded to all comments from Natural England below, including those highlighted as 'yellow' and 'grey' issues.
Natural England's Relevant Representations 4. Part II: Natural England's detailed advice 4.1 Part II, Table 1 of these representations expands upon the detail of all the significant issues ('amber' issues) which remain outstanding and includes our advice on pathways to their resolution where possible. Table 1 also shows, 'yellow' and 'grey' issues. Please refer to Part I for definitions of these. 4.2 Natural England will continue engaging with the Applicant to seek to resolve outstanding concerns throughout the Examination. Natural England advises that the matters indicated as 'amber' will require consideration by the Examining Authority during the Examination.	The Applicant notes the comments received from Natural England and provides full responses to the detailed advice section of Natural England's' Relevant Representation below. The Applicant appreciates the engagement with Natural England undertaken to date and will continue to engage during the Examination to discuss the Scheme. A signed SoCG between the Applicant and Natural England has been prepared and submitted for Deadline 1 of Examination. All matters included in the SoCG regarding the Application have been agreed between the Applicant and Natural England.
Natural England's Relevant Representations, Part II, Table 1 NE Key issue ref. - NE1.1 Topic - International designated sites • Humber Estuary Special Protection Area (SPA) • Humber Estuary Ramsar Issue summary. (C) – construction phase (O) – operational Phase - Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA / Ramsar sites. (C) and (O) Natural England commentary and advice on the further information required to enable assessment. - No Significant Effects Report – Loss of Functionally Linked Land (FLL) Further information is recommended for the assessment of loss of FLL. It would be helpful to identify species relevant to the Humber Estuary SPA, including justification for screening species out of the assessment where relevant. The number of relevant species recorded within and adjacent to the redline boundary should also be presented as a percentage of the most recent Humber Estuary Wetland Bird Survey (WeBS) 5-year average count (2018/19- 2022/23), rather than the national population. The assessment of potential impacts should be informed by the data collected rather than the reliance upon the 10km Impact Risk Zone (IRZ) for wading birds alone. Golden plover and lapwing for example, can forage 15 – 20km from roosting sites within the Humber Estuary. The SSSI IRZs are designed to guide consultations relating to the likely impacts of development on terrestrial SSSIs under Schedule 4 (w) of The Town and Country Planning (Development Management	Paragraph 6.3.7 of the **NSER [APP-201]** reduces reliance of the generic IRZ in Natural England's national guidance and also makes use of survey-specific data indicating the very small number of lapwing and golden plover birds recorded within the Order limits, in accordance with Natural England's request. Following a meeting held on 28 January 2025 with Natural England and the Applicant, Natural England confirmed that the updates to the **NSER [APP-201]** submitted as part of the Application addressed comments regarding the identification of species relevant to the Humber Estuary (Special Protection Area) SPA and justification regarding the IRZs. Natural England requested that survey results for all relevant species screened in are presented in the NSER as a percentage of the most recent WeBS 5-year average count. The Applicant has addressed this point in updates to the NSER for Deadline 1. The Applicant understands that this matter is now agreed with Natural England.

Comments from Relevant Representation– Natural England [RR-006]	Response to Relevant Representation
Procedure) (England) Order 2015 and section 28I of The Wildlife and Countryside Act 1981. The SSSI IRZs are primarily intended for Local Planning Authority (LPA) and Natural England use. They do not alter or remove any other statutory requirements to consult Natural England including on Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008, Environmental Impact Assessments (EIA) the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 or Local Plans under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Very large scale development and strategic plans under legislation such development was not fully factored in when setting the scale and thresholds used to define the SSSI IRZs. Natural England has taken a risk based approach restricting IRZs in relation to wintering golden plover and lapwing to 10km, rather than applying the maximum foraging distance of 15-20km. This is on the basis of reduced sensitivity beyond 10km. However, for very large scale development, there may be a higher risk to foraging land for the species at such distances and additional site-based evidence should be taken into account for such projects. Therefore, we recommend that the bird survey results and other relevant evidence is considered in the assessment of impacts, rather than relying on the IRZ justification. It is noted in this case that numbers of golden plover and lapwing were only recorded in relatively low numbers during the non-breeding bird surveys, so the conclusion is still likely to remain Unchanged. Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO - N/a – Further information recommended. Risk (Red/ Amber/ Green) - 'Yellow' NE Key issue ref. - NE1.2 Topic - International designated sites • Humber Estuary Special Protection Area (SPA) • Humber Estuary Ramsar Issue summary. (C) – construction phase (O) – operational Phase - Potential loss of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA / Ramsar sites. (C) and (O) Natural England commentary and advice on the further information required to enable assessment. - Comments on the No Significant Effects Report – Site Size It is claimed in section 5.3.7 that sites that are smaller than 2ha are unlikely to support a large enough population of birds to constitute 1% of as SPA/Ramsar population. Natural England does not dispute this claim in this case; however, it should be noted that the total area of smaller sites that support SPA birds could in combination support in excess of the 1% 'rule of thumb'. Therefore, we recommend that information should be provided on the species recorded within fields smaller than 2ha; however, this is not anticipated to fundamentally affect the outcomes of the assessment. For information, Natural England has generally advised that if ≥1% of a Humber Estuary bird species population could be affected by a proposal, alone or in combination with other plans or projects, then further consideration is required. However, where species are particularly vulnerable due to declines in the Humber population, then it may not be appropriate to rely on the 1% of the estuary population as the critical threshold. Mitigation measures may be required where lower numbers of vulnerable species are using a site that is proposed for development.	Paragraph 6.3.7 of the **NSER [APP-201]** reduces reliance of the generic IRZ in Natural England's national guidance and makes use of survey-specific data indicating the very small number of lapwing and golden plover birds recorded within the Order limits. It is confirmed that the numbers reported are the maximum recorded across the entirety of fields within the Order limits, not just in parcels of more than 2 ha. The Applicant understands that this matter is now agreed with Natural England.

Comments from Relevant Representation– Natural England [RR-006]	Response to Relevant Representation
Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO - N/a – Further information recommended. Risk (Red/ Amber/ Green) - 'Yellow'	
NE Key issue ref. - NE1.3 Topic - International designated sites • Humber Estuary Special Protection Area (SPA) • Humber Estuary Ramsar Issue summary. (C) – construction phase (O) – operational Phase - Disturbance placement of functionally linked land (FLL) for the relevant qualifying bird features of the listed SPA / Ramsar sites. (O) Natural England commentary and advice on the further information required to enable assessment. - Comments on the No Significant Effects Report – Displacement Disturbance During Operation Section 5.1.9 of the NSER states that disturbance displacement are unlikely to be significant particularly in comparison with wind farms that have larger vertical structures and fast moving parts. Whilst it is true that solar PV developments do lack these features, there may be other impacts, such as the expanse of panels affecting the perceived openness of surrounding areas for relevant species that rely on open vistas for foraging. It is acknowledged however that relevant species such as golden plover and lapwing were recorded in relatively low numbers in surrounding areas in this case. It is advised that the information within the non-breeding bird survey reports is incorporated to improve the justification for the conclusion of no significant effect. Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO - N/a – Further information recommended. Risk (Red/ Amber/ Green) - 'Yellow'	Detail regarding openness of surrounding areas is set out in Paragraph 6.3.17 of the **NSER [APP-201]**. The Applicant also confirms that information within **Volume III, Appendix 8-8: Non-Breeding Bird Report [APP-154]** has indeed been incorporated to justify the conclusion of no significant effect. The Applicant understands that this matter is now agreed with Natural England.
NE Key issue ref. - NE2 Topic - • Humber Estuary Special Protection Area (SPA) • Humber Estuary Ramsar Issue summary. (C) – construction phase (O) – operational Phase - Noise and visual disturbance during construction to potential FLL for the relevant qualifying bird features of the listed SPA / Ramsar sites. (C) Natural England commentary and advice on the further information required to enable assessment. - Comments on the No Significant Effects Report – Noise & Visual Disturbance During Construction The NSER includes the following definition within section 6.2.1: "Significant disturbance is defined to occur where it changes the local distribution/abundance of qualifying birds on a continuing or sustained basis"	Detail regarding the length of the construction phase is provided in Paragraph 6.2.4 of the **NSER [APP-201]**. The Applicant also considers the numbers of relevant SPA birds present within the Order limits in Paragraphs 6.2.2 and 6.3.7 of the **NSER [APP-201]** as part of the justification for its conclusion. Natural England confirmed via email on 13 February 2025 that the required Supplementary Advice on Conservation Objectives (SACO) data has been referred to in the **NSER [APP-201]** and, therefore, the Applicant understands that this matter is now agreed with Natural England.

Comments from Relevant Representation– Natural England [RR-006]	Response to Relevant Representation
In paragraph 6.2.3& it is stated that noise levels may rise above 55dB which may cause disturbance to birds. It the explains that qualifying birds (specifically geese) are likely to move to less disturbed parts of fields or to completely different areas and compares the potential impact to baseline levels of farming activity. However, consideration should also be given to the anticipated length of the construction period within the relevant areas, number of vehicles, erection of fencing, etc. which is not directly comparable to farming activity. It is advised that bird numbers and other relevant information is discussed in this section to justify the conclusion that this level of disturbance will not be significant in this case. Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO - N/a – Further information recommended. Risk (Red/ Amber/ Green) - 'Yellow'	
NE Key issue ref. - NE3 Topic - International designated sites • Thorne & Hatfield Moors Special Protection Area (SPA) Issue summary. (C) – construction phase (O) – operational Phase - Nightjar Foraging Distances (C) (O) Natural England commentary and advice on the further information required to enable assessment. - Comments on the No Significant Effects Report – Nightjar Foraging Distances Table 7 of the NSER details IRZs for different functional groups of birds including nightjar which states that nightjar may forage up to 4km from their roosts but prefer foraging in habitats that lie closer. The Supplementary Advice on Conservation Objectives (SACO) for Thorne and Hatfield Moors details foraging distance up to 5km for nightjar with the majority of foraging visits up to 3km. Natural England acknowledges that this does not affect the outcome of the assessment in this case, however it is worth noting in the assessment. Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO - N/A Risk (Red/ Amber/ Green) - 'Grey'	Paragraph 6.3.2 and Table 7 of the **NSER [APP-201]** clarifies the foraging distance for nightjar and now incorporates the local evidence from the SACO cited by Natural England (i.e. that very few Nightjar flew more than 3km from the Order limits to feed based on tracking data). The Order limits are almost 9km from the SPA and therefore well outside the Zone of Influence. The Applicant understands that this matter is now agreed with Natural England
NE Key issue ref. - NE4 Topic - International designated sites All relevant international designated sites Issue summary. (C) – construction phase (O) – operational Phase - In-combination Assessment. (C) (O) Natural England commentary and advice on the further information required to enable assessment. - Comments on the No Significant Effects Report – In-combination Assessment Natural England advises that more information should be provided in the in-combination assessment of the NSER. More detail is required as to whether there are any residual effects that could act in-combination with other projects. The in-combination requirement ensures that the effects of numerous proposals, which alone would not result in a significant effect, are assessed to determine whether their combined effect would be significant enough to require more detailed assessment. Therefore, where	The Applicant updated Table 11 of the **NSER [APP-201]** prior to the Application to include a more detailed assessment of the potential effects impacts of each individual cumulative development, as well as the potential residual effects resulting from the Scheme in-combination with these cumulative developments. This includes consideration of smaller effects of the Scheme and cumulative developments which were not significant alone. Following the meeting held on 28 January 2025 between Natural England and the Applicant, Natural England requested further detail, including bird survey results and assessments of cumulative developments, to determine if there are any anticipated effects which may combine. The Applicant has updated the NSER for Deadline 1 to address this point in Section 7 and understands that this matter is now agreed with Natural England

Comments from Relevant Representation– Natural England [RR-006]	Response to Relevant Representation
there are small effects which are not significant alone, these should be addressed alongside small effects of other projects which were not significant alone. Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO - N/a: Further information required Risk (Red/ Amber/ Green) - 'Amber'	
NE Key issue ref. - NE5 Topic - Biodiversity Net Gain (BNG) Issue summary. (C) – construction phase (O) – operational Phase - Comments on the Biodiversity Net Gain Strategy. Natural England commentary and advice on the further information required to enable assessment. - Comments on 7.11 Biodiversity Net Gain Assessment Natural England welcome the commitment to delivering BNG on this project. By reviewing the project's BNG assessment at this early stage, it gives us an opportunity to help maximise outcomes and reduce risks. We would like to highlight some areas within the current BNG proposals that could be improved to further enhance the project's overall environmental outcomes. • NE5a: Statutory Biodiversity Metric Natural England is encouraged to see the use of the Statutory Biodiversity Metric, for completeness it is recommended that the original excel file(s) is shared as part of the submitted documents. • NE5B: Assessment Boundary We advise that the biodiversity baseline included within the metric is based upon all land within the development's order limits (red line boundary). This includes all areas required for environmental mitigation. This presents a 'worst case scenario' approach and is consistent with the approach taken for other types of development, including Town and Country Planning Act. The baseline area will likely be refined over time and subsequent iterations of the metric calculations can then be used. We encourage developments to continue to maximise their potential biodiversity outcomes throughout the detailed design process. • NE5C: Watercourse Baseline Data As outlined in the Statutory Biodiversity Metric Guide, watercourses (other than ditches and culverts) should be surveyed by conducting a river condition assessment (RCA) and this person should be RCA trained and accredited. It is not clear in the Biodiversity Net Gain Assessment whether this has been followed. We recommend that developers adhere to the rules and principles set out within the metric guidance. • NE5D: Trading Rules It is noted that the trading rules are not met for 'Urban – Open Mosaic Habitat of Previously Developed Land' (OMH). Trading rules are established to ensure losses are compensated for through creating or enhancing habitats on a 'like-for-like' basis, and of equal or higher value. Although we recommend that the trading rules should be met to align with guidance and industry best practice, Natural England notes the justification provided that the proposed works are temporary, and the habitats will be reinstated. It is encouraging that the Scheme has sought to minimise the area affected and that there is an opportunity for the works to be beneficial to the habitat. • Natural England also notes that OMH is a rare habitat and one which can be mis-identified. We are aware that it has not been possible for the developer to gain access to survey the specific area so is	The Applicant notes that Natural England welcomes the commitment to deliver BNG on this Scheme, as set out in the **BNG Assessment [APP-200]**. The Applicant is committed to delivering BNG, with this commitment being secured in Requirement 7 in Schedule 2 of the **Draft DCO [APP-220]** which requires the Applicant to produce a BNG strategy substantially in accordance with the prescriptions set out in the **Framework LEMP [APP-203]**, which in turn, accords with the terms of the **BNG Assessment [APP-200]**. A detailed LEMP must be approved by the relevant local authority prior to construction and is itself secured by Requirement 6 in Schedule 2 of the **Draft DCO [APP-220]**. <u>Statutory Biodiversity Metric</u> The Applicant provided Natural England with the original excel file of the Statutory Biodiversity Metric. This was shared with Natural England on 8 April 2025. <u>Assessment Boundary</u> The deviation from the Town and County Planning Act methodology has only been applied in relation to the Grid Connection Corridor, with the approach being to focus on the Cable Construction Corridor. The reasoning behind this is that the Order limits in relation to the Grid Connection Corridor is larger than the eventual impact will be, to allow for flexibility in design route optioneering for the Grid Connection Cables. This approach has been accepted within other DCO applications that have been examined by the Planning Inspectorate, such as East Yorkshire Solar Farm and Tillbridge Solar Project. As is discussed in Section 2.2, Paragraph 2.2.1 of the **BNG Assessment [APP-200]**, *"this approach is designed to focus on areas and habitats that are to be directly impacted by the Scheme and ensure that the proposed mitigation is proportionate to that impact. Therefore, areas that are not to be impacted will be excluded from the assessment (i.e. those areas where trenchless crossing methodology has been used to avoid impacts). This prevents the baseline habitat unit score from being inflated by areas of habitat that are not to be impacted and, therefore, does not disproportionately increase the required mitigation."* The Applicant will continue to explore ways to maximise the potential biodiversity outcomes of the Scheme throughout the detailed design process. <u>Watercourse Baseline Data</u> The Applicant can confirm that the surveyors conducting the RCA were appropriately trained and accredited. <u>Trading Rules</u> The Applicant notes and welcomes this comment. As noted in Paragraph 3.3.2 and 3.3.3 in the **BNG Assessment [APP-200]**, whist there is a failure to meet the trading rules due to a loss of 'Urban – Open mosaic habitat, this is not considered significant as there is potential that the temporary disturbance could be beneficial, particularly if supplemented with wider management and enhancement of surrounding habitat present within the wider Order limits.

Comments from Relevant Representation– Natural England [RR-006]	Response to Relevant Representation
classifying the habitat as OMH on a precautionary basis. Natural England recommends that should the DCO be granted, the appropriate surveys are undertaken to determine whether the habitat is in fact OMH as this might alter the results of the adherence to the trading rules. NE5E: Target increase in BNG across biodiversity unit types. We welcome the inclusion of Requirement 7 to secure the BNG Strategy, substantially in accordance with the Landscape and Ecological management Plan (LEMP). We note the LEMP states that "The Applicant will provide at least 10% BNG as part of the Scheme." However, we recommend that the target increase in BNG is secured across all biodiversity unit types. Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO - N/A Risk (Red/ Amber/ Green) - 'Grey'	The Applicant notes the comments regarding Open Mosaic Habitats on Previously Developed Land and confirms that prior to any works commencing further surveys will be undertaken to determine the value and condition of these habitats and the impact of the Scheme on these. As stated in Table 3-3 of the **Framework CEMP [APP-196]**, pre-construction site walkovers will be undertaken in advance of mobilisation/any potential advance works to re-confirm the ecological baseline conditions and to identify any new ecological risks. <u>Target Increase in BNG</u> As set out in the **BNG Assessment [APP-200]**, the Scheme is predicted to deliver a net gain of 36.46% for area habitat units, 62.75% for hedgerow units, and 24.97% for watercourse units.
NE Key issue ref. – NE6 Topic - Protected Species Issue summary. (C) – construction phase (O) – operational Phase - Protected species – Badger Natural England commentary and advice on the further information required to enable assessment. - Chapter 8 Ecology – Table 8-10: Embedded Avoidance and Mitigation Measures & 7.7 Framework Construction Environmental Management Plan – Table 3.3 Ecology. An exclusion zone of 'up to 30m around setts' is described within the table to avoid any impacts to badgers. Natural England advises that, although some limited activities can be undertaken within 30m (work with hand tools for example), a hard 30m limit should be imposed for works with heavy machinery, horizontal drilling and heavy plant vehicles. Natural England comment on the mechanism for securing mitigation / compensation measures in the DCO - N/A Risk (Red/ Amber/ Green) - 'Amber'	The Applicant has updated Table 3.3 of the Framework CEMP for Deadline 1 to include the commitment of a hard 30 m exclusion zone around Badger setts for construction works involving heavy machinery, horizontal drilling and heavy plant vehicles. The Applicant understands that this matter is now agreed with Natural England.

Table 2-9 Applicant's Response to Relevant Representations – Network Rail Infrastructure Ltd [RR-007]

Comments from Relevant Representations	Response to Relevant Representation
APPLICATION BY FENWICK SOLAR PROJECT LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR FENWICK SOLAR FARM Planning Inspectorate Reference Number: EN010152 Section 56 Planning Act 2008: Relevant Representation of Network Rail Infrastructure Limited This is the section 56 representation of Network Rail Infrastructure Limited (Network Rail) provided in respect of Fenwick Solar Project Limited's (Applicant) application for a Development Consent Order (Order) to authorise the project comprising the installation of solar photovoltaic (PV) generating panels, associated electrical equipment, cabling and energy storage facilities together with grid connection infrastructure (Scheme). Network Rail is a statutory undertaker and owns, operates and maintains the majority of the rail infrastructure of Great Britain (Railway). Network Rail wishes to ensure that the Scheme will not have a detrimental impact on the operation of the Railway and that the safety of the Railway is maintained during the construction, operation and ongoing maintenance requirements of the Scheme. The Applicant seeks authority and powers in the draft Order to: permanently acquire rights over land in the ownership of Network Rail (Railway Land) over the following plots: a) plot 5/03 - Permanent acquisition of new rights over 5059 square metres of public highway (Moss Road), verge, drain (Copley Spring) and level crossing over railway (East Coast Main Line), Moss, Doncaster, and overhead cables; b) plot 9/09 (in respect of sub-soil) - Permanent acquisition of new rights over 21352 square metres of public highway (Thorpe Bank), verge, and bridge structures over drains (Thorpe Marsh Engine Drain, Thorpe Marsh Drain), Barnby Dun, Doncaster, and overhead cables; c) plot 10/01 - Permanent acquisition of new rights over 3594 square metres of trees, shrubbery, drain and culvert, west of Thorpe Lane, Barnby Dun, Doncaster; d) plot 10/02 - Permanent acquisition of new rights over 3279 square metres of railway line (CJS Carcroft Junction to Stainforth Junction Line), Barnby Dun, Doncaster; e) plot 10/04 - Permanent acquisition of new rights over 9080 square metres of disused railway line, hardstanding, grassland, trees and shrubbery, west of Thorpe Lane, Barnby Dun, Doncaster; and f) plot 11/07 - Permanent acquisition of new rights over 6661 square metres of public highway (Station Road), footway and level crossing over railway (in respect of a level crossing). Extinguish existing rights or restrictive covenants for the benefit of Network Rail (in so far as they are inconsistent with the new rights proposed to be acquired by the Applicant) over the following plots: a) plot 8/14 - in respect of a restrictive covenant on title SYK26546; b) plot 9/02 - in respect of a restrictive covenant on title SYK490734; c) plot 9/04 - in respect of a restrictive covenant on title SYK490734; d) plot 9/07 - in respect of a restrictive covenant on title SYK110502; e) plot 9/10 – in respect of rights; f) plot 10/03 - in respect of a restrictive covenant on title SYK364907; and g) plot 10/09 - in respect of a restrictive covenant on title SYK432770. As the Applicant proposes to: Compulsorily acquire new rights over Railway Land (including the operational CJS Carcroft Junction to Stainforth Junction Line at Barnby Dun, Doncaster, Moss Level Crossing at Moss Lane, Doncaster and the Askern Level Crossing at Station Road, Askern); and	The Applicant and Network Rail have agreed a form of bespoke protective provisions that have been included as Part 4 of Schedule 14 to the **Draft DCO** at Deadline 1. The Applicant and Network Rail are also finalising a corresponding side agreement, which is anticipated to be agreed and signed shortly. Following this, the Applicant understands that Network Rail will be in a position to withdraw its objection to the Scheme. The Applicant has also obtained the necessary business and technical clearance from Network Rail. The Applicant and Network Rail have also reached an agreed form on a voluntary Option Agreement for the land rights required, which awaits signature subject to the provision of a revised easement plan. Therefore, the Applicant considers that the compulsory acquisition rights in the **Draft DCO [APP-220]** are appropriate.

Extinguish existing rights or restrictive covenants for the benefit of Network Rail (in so far as they are inconsistent with the new rights proposed to be acquired by the Applicant),

Network Rail hereby objects to the making of the Order in principle on the ground that the powers sought are likely to interfere with the safe and efficient operation of the Railway and cause a serious detriment to the carrying on of Network Rail's statutory undertaking. Network Rail also objects to all other compulsory powers in the Order to the extent that they affect, and may be exercised in relation to, Network Rail's property and interests.

In order for Network Rail to be in a position to withdraw its objection Network Rail will require adequate protective provisions to be included within the Order and an agreement with the Applicant to ensure that the new rights sought are exercised in regulated manner to prevent adverse impacts to the Railway.

Network Rail is continuing to review the Applicant's plans, draft Order and application documents, and will continue to work constructively with the Applicant to clarify any issues raised. The Examining Authority and the Secretary of State will need to be satisfied that railway safety and operations will not be compromised by the making of the Order.

Network Rail hereby requests that the Examining Authority treats Network Rail as an Interested Party for the purposes of the Examination and Network Rail reserves the right to produce additional and further grounds of concern when further details of the Scheme and its effects on Network Rail's assets are available.

Table 2-10 Applicant's Response to Relevant Representations – Office of Road and Rail [RR-008]

Comments from Relevant Representations– Office of Road and Rail	Response to Relevant Representation
Office of Rail and Road note from the Fenwick Solar Project documentation that the order limits for the project will impact two level crossings (Askern level crossing OS grid reference: SE564136 and Moss level crossing OS grid reference: SE587143). Although the actual solar project will not be built immediately adjacent to these level crossings, the documentation confirms that the level crossings will be within an area subject to temporary traffic signal and banksman control during the construction of the project. This will potentially impact the operation of the level crossings and impact vehicle/pedestrian users, as well as any freight and passenger train services. Alterations to the use of the level crossings from temporary traffic control also has the potential to impinge routine maintenance of the level crossings. I would recommend that any proposed traffic management impacting the level crossings at Moss and Askern as part of the Fenwick Solar project are discussed and assessed with Network Rail, the infrastructure manager, to ensure that any foreseeable risks from the proposals are identified and mitigated as necessary.	The Applicant has prepared a **Transport Assessment [APP-179]** and **Framework CTMP [APP-206, APP-207]** which outline the specific vehicle routing requirements during construction. The reports highlight that usage of both the Askern and Moss rail level crossings would need to be used to enable access to the Order limits. The **Framework CTMP [APP-206, APP-207]** also sets out measures to minimise the impacts and disturbance caused by construction traffic on the local and strategic road network. This includes a description of measures to be introduced to minimise impacts associated with traffic using the level crossings. The Applicant does not propose to affect the operation of the level crossing either through use as part of construction routes or through any proposed temporary traffic management. Where staff or delivery traffic uses the level crossing, drivers will comply with the operation of the level crossing, rather than affecting the operation of the crossing itself. In addition, the Applicant has agreed with Network Rail a bespoke set of protective provisions and is in the process of finalising a corresponding framework agreement, as requested by Network Rail, in order to address Network Rail's concerns in relation to the Scheme. A detailed CTMP will be prepared which will need to be approved prior to construction by City of Doncaster Council as the relevant planning authority in consultation with Network Rail. This must be substantially in accordance with **Framework CTMP [APP-206, APP-207]** and this is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**.

Table 2-11 Applicant's Response to Relevant Representations – South Yorkshire Fire and Rescue Service [RR-009]

Comments from Relevant Representation– South Yorkshire Fire and Rescue Service	Response to Relevant Representation
To whom it may concern, Legislation: Fire and Rescue Services Act 2004 Address: Fenwick Solar Farm, near Doncaster, South Yorkshire Planning Proposal: Solar PV electricity generating facility exceeding 50MW, with Battery Energy Storage System (BESS) connection to national grid via National Grid's Thorpe Marsh Substation. South Yorkshire Fire and Rescue (SYFR) have provided the following comments for consideration following review of application EN010152. The following recommendations are advisory only and do not form part of any current legal requirement of this Authority. The information is provided to ensure that, in the event of an incident at the site, the Fire and Rescue Service (FRS) is able to act quickly and effectively to protect lives, infrastructure and the environment. SYFR would request due consideration be given by the applicant and the planning authority to ensure a fire involving BESS can be safely contained.	The Applicant acknowledges receipt of SYFRS' advisory recommendations and responds to each comment in full in the rows below.
1. Guidance The FRS advises that the guidance in the following documents is considered as part of the design process: □ NFCC Grid Battery Energy Storage Systems Planning – Guidance for FRS □ National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems. □ FM Global Property Loss Prevention Data Sheets 5-33, as revised January 2024	The Applicant can confirm that all SYFRS referenced documents were considered during the drafting of the **Framework BSMP [APP-205]** and to inform illustrative site design plans.
2. Firefighting Arrangements SYFR procedures for fighting BESS fires may involve the use of multiple high reach appliances. This is to ensure that sufficient distance can be created to safeguard our attending crews from residual electrical current. Please ensure that suitable access roads are provided to support the weight of these appliances; please also ensure that there are no overhead obstructions (i.e. trees or overhead power lines) in the area around the BESS. Markings externally to the containers (similar to aircraft) to notify crews where a lance or stinger can be used without damaging any cells. Clear instructions and markings will aid crews in being able to tackle the fire quickly with the working site knowledge of the system.	As specified in Paragraph 3.3.5 of the **Framework BSMP [APP-205]**, a swept path analysis for emergency vehicles has been undertaken and the roads leading to the BESS Area have been confirmed as suitable for emergency vehicle access. The relevant access roads within the Order limits have been designed to support the weight of fire-fighting appliances, as required. Section 3.3 of the **Framework BSMP [APP-205]** also confirms the proposed width of access roads around the BESS Area will be 8 m and that there are no dead-end access routes. Road networks within the Order limits will enable unobstructed access to all areas of the BESS Area, and two separate SYFRS access points to the BESS Area have been integrated to ensure firefighters do not have to drive through a smoke or gas plume to access the BESS Area. The Applicant can confirm that BESS Containers will not be sited in areas with overhead power lines that would restrict incident observation platform use. Operational protocols will be established and integrated into the ERP which will be prepared following detailed design, as secured in the **Framework BSMP [APP-205]**, to ensure that incident observation and thermal imaging activities are conducted without interference from infrastructure, prioritising both safety and functionality. The Applicant's approach to firefighting protocols is outlined in Section 3.6 of the **Framework BSMP [APP-205]**. The Applicant does not support the use of lance or stinger devices for BESS designs due to increased explosion risks posed to firefighters. Paragraph 2.1.30 of the **Framework BSMP [APP-205]** outlines automatic and dry pipe suppression systems that will be considered for the Scheme, together with fire testing requirements, and all systems must operate effectively in conjunction with a gas exhaust/ventilation system. The Applicant has

Comments from Relevant Representation– South Yorkshire Fire and Rescue Service	Response to Relevant Representation
	engaged with SYFRS to discuss the approach and good practice for BESS fire suppression proposed for the Scheme.
3. Site Access The NFCC guidance states at least 2 separate access points to the site to account for opposite wind conditions/direction. Firefighters should not have to enter the BESS site or drive through a vapour / gas cloud to reach the scene of operation, therefore an alternative access point, taking into account wind direction, is preferable. The principles contained within Approved Document B, in support of B5 may assist in providing proportionate and adequate provision of access and facilities for firefighting. Section 15 provides information relating to access routes and hardstanding areas that consider the dimensions of fire service vehicles. eWhere access is over 20m from the access road, a turning circle, hammerhead or other point at which a vehicle can turn should be provided. Road / hard standing should be suitable to accommodate fire service vehicles in all weather conditions.	The authorised development provides two separate access points to provide emergency services with the required flexibility to access the Order limits in the event of an emergency. Access 1 is sited off Moss Road, will constitute the main access to the authorised development. Access 4, sited off Fenwick Common Lane, constitutes the secondary access during operation for emergency services. Details of these accesses are provided in Appendix A of the **Framework CTMP [APP-206, APP-207]**.
Appliance dimensions are variable and designers should take account of this. SYFR appliance dimensions for the current fleet are as follows: Scania Rescue Pumps and Scania Turntable Ladders [table of dimensions included within original relevant representation document] It is noted from the site plans, the access locations. In respect of the BESS, it is noted that an access track has been given to enable FRS access via the access track to enable a choice of direction and sufficient space for vehicle access. FRS access is noted for the various location points. Access for the BESS is given via a loop track, allowing choice of approach. Sufficient track width should be maintained over the lifetime of the site to give suitable access and space for any firefighting operations.	Access off the local highway for construction and emergency service vehicles has been considered by the Applicant and it can confirm that the vehicle dimensions can undertake the appropriate turning movements to access the Scheme. It should be noted that Access 4, off Fenwick Common Lane onto Haggs Lane, due to its overall width, would only function as a one way access route during construction, with egress being provided onto Moss Road from Access 1. Details of these accesses are provided in Appendix A of the **Framework CTMP [APP-206, APP-207]**.In the event of access being required for emergency vehicles during operation, it is anticipated that Access 4 could be utilised as an access or egress to allow the emergency operators flexibility to attending to the needs of any emergency. In respect to the height of these vehicles, any statutory undertaker assets which may act as a constraint will be reviewed in conjunction with the Statutory Undertaker to determine if any protection and/or diversions are required for both the construction and operation of the authorised development. The Applicant confirms that the access track is suitable for the named SYFRS appliances and confirms that track width will be maintained for the lifetime of site use.
4. Water Supply In the event of a fire involving BESS, it is likely that SYFR will need to apply a higher than average volume of water to restrict fire spread. Please ensure that there is an adequate water supply within 90m to allow continuous firefighting operations to take place; please also ensure due consideration has been given to containing fire water run-off. Separators, under the site can be introduced, to container fire water run-off. Firefighting run-off water can have a serious impact on the environment and nearby open water. Having water separators under the site to contain this hazard means the water can be properly disposed of after the incident. aHydrant location and water tanks are noted to be provided within the site, and understood to be pressurised.	Section 3.2 of the **Framework BSMP [APP-205]** outlines the Applicant's proposed fire water provision for the BESS Area, namely four separate pressurised water tanks providing a total of 720,000-976,000 litres of water for firefighting. The Applicant notes SYFRS' request that no water hydrant (pump driven supply) will be located more than 90 metres from the furthest BESS Container. Fire Hydrant positioning and flow rate will be agreed with SYFRS at the detailed design stage and will align with the latest NFCC guidance. As outlined in Paragraph 3.2.5 of the **Framework BSMP [APP-205]** "*The BESS scheme will integrate external firefighting water capture drainage. To prevent potential contamination to the surrounding ground, the gravel basins will be non-infiltrating, underlain with an impermeable liner. Penstocks will also be in place at the outlets from the gravelled areas to hold any fire water in that cell of the system. This allows the stored water to be tested before release or, if necessary, removed by tanker and treated offsite*."
5. Spacing between BESS units	The Applicant has drafted the **Framework BSMP [APP-205]** to incorporate all the key NFCC guidelines and NFPA 855 recommendations listed in point 5 of SYFRS's response.

Comments from Relevant Representation– South Yorkshire Fire and Rescue Service	Response to Relevant Representation
In order to restrict fire spread it is essential that suitable space be maintained around the BESS. If this space is not provided this may allow rapid fire to spread to nearby structures and combustible items. The emergency response plan should be predicated on the scenario of the fire will not spread beyond the BESS container of origin. With fire and rescue operations limited to boundary cooling of surrounding BESS and monitoring the BESS involved in thermal event. This outcome can be achieved through a number of different routes including: □ Adequate separation between the BESS enclosures to ensure that the radiant heat from a thermal event in one BESS will not trigger a secondary event. □ Provision of fire resistant materials that will prevent direct flame impingement or radiated heat affecting adjacent BESS and allowing the incident to develop beyond BESS of origin. The provision of a suppression system to the BESS is unlikely to provide a compensatory feature to allow reduced spacing between BESS.	The System Layout content in the **Framework BSMP [APP-205]** (Paragraphs 2.1.18 to 2.1.24) details equipment spacing and NFCC guideline commitments ensuring risk should be adequately minimised to limit a fire event to a single BESS Container or ESS structure. As detailed in the **Framework BSMP [APP-205]**, if a BESS automatic fire suppression system is integrated to provide thermal runaway mitigation it will conform to NFPA 855 (2023) guidelines, and the suppression system will be tested to UL 9540A latest standard or significant scale third party fire and explosion testing. Fire suppression system performance will be benchmarked against free burn testing. An independent Fire Protection Engineer specialising in BESS will be contracted by the Operations, Engineering and Maintenance Contractor to review all UL 9540A test results and any additional fire and explosion test data which has been provided and validate the suppression system design.
In the event that the developer cannot demonstrate that a thermal event / fire can be contained to the BESS of origin, then the developer should be referred to guidance such as the separation distances within NFPA 855 (current edition - 2023). NFPA 8551 states separation can be reduced to at least 3 feet or 0.914m between BESS if tests such as UL 9540A shows propagation does not occur.	The Applicant confirms that as stated in Paragraph 2.1.5 of the **Framework BSMP [APP-205]** *"As a minimum, the battery system will have completed unit or installation level UL 9540A testing, demonstrating that thermal runaway propagation will not spread between modules or between battery racks and the generation of explosive gases will not threaten container structural integrity. This offers a high level of protection against fire and explosion risk."* Paragraph 2.1.10 of the **Framework BSMP [APP-205]** further clarifies "*If the BESS system is designed to safely burn out without internal fire suppression systems (to remove the risk of stranded energy in the battery systems), full-scale free burn testing will be conducted to demonstrate that loss will be safely limited to one container without the intervention of SYFR. BESS designs available in 2024 compliant with this good practice include the Tesla Megapack 2XL, Fluence Cube, and Wartsila GridSolv Quantum BESS systems. These BESS designs have conducted UL 9540A and 3rd Party full scale free burn testing to validate safe equipment spacing and demonstrate that deflagrations do not occur or can be safely constrained. UL 9540A heat flux test data can also establish safe distances between containers and ESS equipment but will not be conclusive if full propagation of the battery system does not occur in the test.*"
Consideration should also be given to the provision of automatic suppression systems within each container to delay fire spread to neighbouring BESS units. With consideration for 'In rack' suppression as the external system may not penetrate the racks. Design of the suppression system is key to reducing the fire and fire spread, design of the system should be created by a Responsible Person such as a Fire Engineer. External audible and or visual warning to denote if the detection has activated or if the suppression has been deployed. Information and clear indication of warning and activation of systems is vital to fire operations on site. This will give notice to fire crews if another unit on site is affected by the fire or system malfunction. cRemote activation of the suppression system so that the monitoring station can activate. When a site is monitored remotely, remote activation and communication between crews on site and the remote monitoring centre should be made available with clear instructions on how to do so with a 24hr telephone number.cBlast walls across each entrance and between units to reduce the blast risk to first responders and limit radiated heat to other units. Reducing the risk of fire spreading to more than one unit a prioritised concern for the fire crews so any facilitation to reduce this risk is more than beneficial.	Paragraph 2.1.30 of the **Framework BSMP [APP-205]** details the Applicant's approach to explosion prevention/protection together with fire suppression standards and testing requirements which must be fulfilled. Fire and gas detection equipment will comply with NFPA 855 (2023) and NFPA 69 standards, with gas detection systems having external BESS beacon and audible alert facilities. Final specifications will be fully agreed with SYFRS at the detailed design stage and fully align with NFPA and NFCC guidance. Signage will be installed in a suitable and visible location on the outside of the BESS Containers, identifying the presence of a BESS system. Signage would be as per NFCC guidelines and will also include details of: • Relevant hazards posed i.e. the presence of High Voltage DC Electrical Systems is a risk, therefore their location should be identified; • The type of technology associated with the BESS Area; • Any suppression system fitted; • 24/7 Emergency Contact Information; and • Signs on the exterior of a building or enclosure will be sized such that at least one sign is legible at night at a distance of 30 m or from the Order limits, whichever is closer.

Comments from Relevant Representation– South Yorkshire Fire and Rescue Service	Response to Relevant Representation
	The Emergency Response plan template detailed in Paragraph 3.5.5 of the **Framework BSMP [APP-205]** will include: • How the fire service will be alerted and incident communications and monitoring capabilities; • Up-to-date details of the emergency response co-ordinator including the subject matter expert (SME) for the Order limits; and • Details and explanation of warning systems and alarms on site and locations of alarm annunciators with alarm details (smoke, gas, temperature).
6. Spacing to other buildings beyond site perimeter Proposed distances should take into account risks including the impact of any vapour cloud and also any mitigation factors that have been incorporated into the site design. However, an initial minimum distance of 30m is proposed prior to any mitigation such as blast walls. This distance is based upon the 100ft distance cited in NFPA 855 for remote installations	Paragraph 2.1.20 of the **Framework BSMP [APP-205]** confirms this commitment in alignment with NFPA 855 (2023) requirements and NFCC guidance.
7. Environmental Impact A well-developed fire involving BESS may have a large negative impact on the local environment. The Environment Agency should be involved at an early stage to discuss ways in which the environmental impact of this can be mitigated. A plan should be prepared to assist in discussions with developers and planners regarding the suitability of a site location highlighting all sensitive receptors within a 1km radius of the site to allow for appropriate emergency planning. Examples of sensitive receptors may include: □ Schools, hospitals, nursing and care homes, residential areas, workplaces. □ Protected habitats, watercourses, groundwater, boreholes, wells and springs supplying water for human consumption. Further habitat information can be found on the DEFRA MAGiC map website. □ Roads, railways, bus stations, pylons (on or immediately adjacent to the site only), utilities, airports. Any plans created should have a compass rose showing north and the prevailing wind direction.	The Applicant will continue to engage with the Environment Agency regarding the Scheme, including the environmental impact and mitigation proposed in relation to BESS Container fires. The **Framework BSMP [APP-205]** stipulates "*As recommended in NFCC guidelines (2024) a BESS system and site specific Plume Analysis study will be conducted to assess the environmental impact of a site incident to sensitive receptors within a 1km radius. Toxic gas emissions to sensitive receptors must be below Public Health England (PHE) guidelines when the battery system of a BESS is fully consumed (burnt out). In addition to toxic gas emissions, production of Particulate Matter (PM) in a BESS fire should also be included in the assessment. The plume study will also include a visibility impact assessment on any transport links within a 1km radius of the BESS area.*" Section 4.5 of the **Framework BSMP [APP-205]** specifies that at the detailed design stage in alignment with 2024 NFCC draft guidelines (2024), a BESS system and site-specific Plume Analysis study will be conducted by the Applicant post consent once the specific battery technology to be used for the Scheme is confirmed. The site-specific Plume Analysis study will assess the environmental impact of an incident to sensitive receptors within a 1km radius. **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]** describes how the drainage system around the BESS Containers has been sized to allow collection of firefighting water during fire event and a concurrent two-year storm event. This volume would be held within the gravel surrounding the BESS Containers and would be prevented from discharging by a penstock. This will allow any stored water to be tested and discharged appropriately. **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]** also notes that the gravel area will be lined to prevent infiltration into the ground.
8. Emergency Plans Site operators should develop emergency plans and share these with the Fire and Rescue Service. A Risk Management Plan should be developed by the operator, which provides advice in relation to potential emergency response implications including: □ The hazards and risks at and to the facility and their proposed management. □ Any safety issues for firefighters responding to emergencies at the facility.	The Applicant confirms that commitments to developing a Risk Management Plan and Emergency Response Plan are fully aligned with NFCC guidance and minimum requirements are detailed in Paragraphs 3.5.7 and 3.5.5 of the **Framework BSMP [APP-205]**. Paragraph 3.5.6 of the **Framework BSMP [APP-205]** confirms "*The operator will develop a post-incident recovery plan that addresses the potential for reignition of the BESS and de-energizing the system, as well as removal and disposal of damaged equipment.*"

Comments from Relevant Representation– South Yorkshire Fire and Rescue Service	Response to Relevant Representation
□ Safe access to and within the facility for emergency vehicles and responders, including to key site infrastructure and fire protection systems. □ The adequacy of proposed fire detection and suppression systems (e.g., water supply) on-site. □ Natural and built infrastructure and on-site processes that may impact or delay effective emergency response.	Requirement 5 of the **Draft DCO [APP-220]** requires a battery safety management plan to be submitted to and approved by City of Doncaster Council as the relevant planning authority in consultation with the South Yorkshire Fire Service. The battery safety management plan must be substantially in accordance with the **Framework BSMP [APP-205]**.
An Emergency Response Plan should be developed to facilitate effective and safe emergency response and should include: □ How the fire service will be alerted □ A facility description, including infrastructure details, operations, number of personnel, and operating hours. □ A site plan depicting key infrastructure: site access points and internal roads; firefighting facilities (water tanks, pumps, booster systems, fire hydrants, fire hose reels etc); drainage; and neighbouring properties. □ Details of emergency resources, including fire detection and suppression systems and equipment; gas detection; emergency eye-wash and shower facilities; spill containment systems and equipment; emergency warning systems; communication systems; personal protective equipment; first aid. □ Up-to-date contact details for facility personnel, and any relevant off-site personnel that could provide technical support during an emergency. □ A list of dangerous goods stored on site. □ Site evacuation procedures. □ Emergency procedures for all credible hazards and risks, including building, infrastructure and vehicle fire, grassfire and bushfire Site Information box (SIB) with action cards, plans and a risk assessment. Up to date and accurate site data will aid firefighters on arrival at site, upon fire incidents.	
9. Recovery A post-incident recovery plan should be developed that addresses the potential for reigniting of ESS and de-energizing the system, as well as removal and disposal of damaged equipment.	
Fire Protection A direct, 24-hour contact number should be provided to allow SYFR to contact the monitoring station for the site and request further information. Before the site goes 'live' it is recommended that contact is made with the local fire station in order to arrange for Site Specific Risk Information (SSRI) to be collected, this will enable fire crews to familiarise themselves with the development and protection measures that have been installed and location of site information box and associated response plans. .Please quote our reference number on all correspondence. .If have any queries concerning these matters may be directed to the inspector named above. .Yours sincerely .Chief Fire Officer ..Data Protection Act 2018.Information provided relating to any application made to South Yorkshire Fire & Rescue will be retained and may be used for future enforcement purposes and monitoring statutory compliance by SYFR and related enforcement agencies. Disclaimer – Any legal liability howsoever arising from any information contained in this correspondence is hereby excluded	The Applicant confirms it will provide a direct 24-hour contact number for SYFRS. In addition, in accordance with NFCC guidelines, signage will be displayed prominently within the BESS Area listing 24/7 Emergency Contact Information. The Applicant confirms that before operations commence all SSRI information will be made available to the local fire station; these materials will be agreed with SYFRS and minimum content is detailed in Paragraph 3.5.4 of the **Framework BSMP [APP-205]**.

Table 2-12 Applicant's Response to Relevant Representations – Danvm Drainage Commissioners [RR-013]

Comments from Relevant Representation– Danvm Drainage Commissioners	Applicant's Response
Danvm Drainage Commissioners are the Internal Drainage Board for the development site, and the relevant authority for matters related to land drainage. The Board have been in discussions with the developers, and have agreed the drainage principles as set out so far. The Board currently has no objection to the plans that have been provided, or the methodology relating to watercourse crossings, access strips and discharge rates / attenuation.	The Applicant welcomes the confirmation that the Danvm Drainage Commissioners have no objections to the current plans and methodologies proposed for the Scheme. The Applicant will continue to work with the Danvm Drainage Commissioners regarding the Scheme and is currently awaiting confirmation from the Danvm Drainage Commissioners of its position on their application for the East Yorkshire Solar Farm and will adopt the same approach for this Scheme.
The development will include a DCO, which will include the setting aside of Board Byelaws and the usual Land Drainage Consent application process for works affecting watercourses. The Board's solicitors are in the process of agreeing the wording of a DCO for a similar proposal from the same applicant in a different area, and the Board understands the wording of the protective provisions attached to this development will reflect these discussions.	The Applicant's proposed wording seeks to disapply the need for consent under Section 23 of the Land Drainage Act 1991, alongside any byelaws made under the Section 66 of the same Act, which is standard procedure following DCOs recently made of a similar nature. The Applicant is currently awaiting confirmation from the Danvm Drainage Commissioners of this position on their application for the East Yorkshire Solar Farm and intends to use a similar form of protective provisions for this Scheme, which it is hopeful of reaching agreement on by Deadline 2. In any event, the Applicant also notes that Part 3 of Schedule 14 of the **Draft DCO [APP-220]** provides standard protective provisions for the protection of drainage authorities. The Applicant notes the recent guidance *"Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects"* which confirms *"The presumption should be therefore that where an applicant proposes a provision within their DCO to remove a requirement for a prescribed non-planning consent to be granted by the relevant body, the body that would normally be responsible for granting this consent is expected to make every effort to agree to the proposal. Such a body should only object to the inclusion of such provision with good reason, and after careful consideration of reasonable alternatives."*
The Board would welcome ongoing discussions with the developer as more detailed plans become available, particularly with regards to access to Board-maintained watercourses and ensuring any landscaping schemes are compatible with the Board's activities. In addition to more detailed plans, at an appropriate stage the Board will require details of the ongoing management arrangements of surface water drainage infrastructure, and any landscaped areas that interact with watercourses, over the lifetime of the development. If any further information is required from the Board at this stage, please get in touch with its development control team.	The Applicant will continue to engage with the Danvm Drainage Commissioners regarding the Scheme. Details of the proposed works will be shared with the Danvm Drainage Commissioners for further comment once the design and programme are finalised. The Applicant will consider any comments received from the Danvm Drainage Commissioners when preparing the Surface Water Drainage Strategy, which must be prepared in accordance with Schedule 2, Requirement 9 of the **Draft DCO [APP-220]** and which will need to be approved prior to construction by City of Doncaster Council. Paragraph 20(2) of the standard protective provisions for the protection of drainage authorities, contained in Part 3 of Schedule 14 of the **Draft DCO [APP-220]**, also requires the Applicant to submit plans, and any further details requested, of a proposed specified work for approval prior to the construction phase. The Applicant notes that any separately agreed protective provisions for the benefit of the Danvm Drainage Commissioners will also include this requirement.

Table 2-13 Applicant's Response to Relevant Representations – Northern Powergrid (Yorkshire) plc [RR-018]

Comments from Relevant Representations– Northern Powergrid (Yorkshire) plc	Response to Relevant Representation
The following representations are submitted on behalf of Northern Powergrid (Yorkshire) Plc ('Northern Powergrid') as an electricity undertaker for the area within which the Fenwick Solar Farm is to be located: There is a significant amount of Northern Powergrid infrastructure within the red line boundary area of the Order and thus the project has a direct impact on Northern Powergrid's existing critical national infrastructure which serves significant numbers of customers in the local and wider area. Northen Powergrid's rights for these assets are essential in maintaining an uninterrupted power supply to the customers they serve. Northern Powergrid has a statutory duty to provide its customers with an uninterrupted supply of electricity and thus rightly raises concerns to any scheme that would result in a breach to its duty. The proposed development seeks to interfere with Northern Powergrid's existing apparatus; there are many points at which the required infrastructure in the Order Land crosses NPG's overhead lines and underground cables both of which are vital for Northern Powergrid's existing operations. Northern Powergrid therefore reserves the right to review the position as the scheme progresses and protect its existing apparatus including with bespoke protective provisions in the Order, as at this stage, the specific details of the DCO infrastructure including the depth, diameter and respective easement strips are unknown. NPG's existing apparatus may need to be diverted to accommodate the DCO project and therefore NPG requires bespoke protective provisions to protect its position and recover the costs of any required diversions or relocations. Northern Powergrid also has concerns over the currently proposed protective provisions contained within the draft Order as they do not take into account site specific issues and do not accord with Northern Powergrid's standard protective provision requirements. The compulsory purchase powers incorporated into the DCO seeks to acquire land and interests which, if acquired, would adversely affect Northern Powergrid's ability to use, access, maintain and where necessary upgrade its equipment. It is not necessary to acquire these interests where an agreement between the parties would be more appropriate. Northern Powergrid is keen to discuss its concerns with Fenwick Solar Project Limited ('the Applicant') to reduce the project's impacts on Northern Powergrid's apparatus and agree bespoke protective provisions within the draft Order.	The Applicant and Northern Powergrid (NPG) have agreed a form of bespoke protective provisions that have been included as Part 8 of Schedule 14 to the **Draft DCO** at Deadline 1. The Applicant and NPG have also agreed a form of the corresponding side agreement, which is out for signature by both parties. Once this side agreement is signed and completed, the Applicant understands that NPG will withdraw its objection to the Scheme – this is anticipated to take place by Deadline 2.

2.5 Persons with an Interest in the Land

Table 2-14 Applicant's Response to Relevant Representations – Persons with an Interest in the Land

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
RR-016	H J Banks and Company Ltd	Category 1 and 3 interest (freehold owner and occupier)	FENWICK SOLAR FARM NOTICE OF ACCEPTANCE OF AN APPLICATION FOR A DEVELOPMENT CONSENT ORDER BY THE SECRETARY OF STATE UNDER SECTION 56 OF THE PLANNING ACT 2008: REGULATION 8 OF THE INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORM AND PROCEDURES) REGULATIONS 2009 ("APFP REGULATIONS"); REGLUATION 16 OF THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017. This consultation response in in relation to Application EN010152 and your letter of 4th December 2024 and is the response of H J Banks and Company Ltd "HJB". HJB are the registered owners of part of the land at Thorpe Marsh Power Station. We have granted Thorpe Marsh Green Energy Hub Limited "TMGEHL" and UK Transition Power Holdings Ltd, part of Fidra Energy an option to acquire land at the Thorpe Marsh Power Station site.	The Applicant notes this comment.
RR-016	H J Banks and Company Ltd	Category 1 and 3 interest (freehold owner and occupier)	Part of HJB's registered title falls within the current red line boundary (RLB) of the proposed Fenwick Solar Farm development as referenced on plan EN010152/APP/2.2 titled Works Plan – Sheet 10 of 11. The area of interaction is on the eastern boundary of the HJB land and includes a section of the West Circuit site access track as well as Marsh Lane, the access road into our site from Forstead Lane, which is also the main road access into the Thorpe Marsh National Grid substation facility. These access roads also have rights of access by National Grid, Elba Ltd as well as other parties and tenants on our registered title.	The Applicant notes this comment.
RR-016	H J Banks and Company Ltd	Category 1 and 3 interest (freehold owner and occupier)	We have held two Teams meetings with representatives of Boom Power Ltd before and since the publication of the Draft Development Consent Order, and we have explained that our concerns relate to the following matters: • The area of the DCO order covers the access road into the site and that road is required for 24/7 access into the site by various parties and cannot be adversely affected or restricted by the Boom Power Ltd proposal • The area interacts with the boundary of the option that we have granted to TMGEHL and Fidra Energy for a Battery Storage Scheme "BESS" that is currently well advanced in the planning process, and the Boom Power Ltd DCO area covers	The Applicant notes the response provided. Works to facilitate access to the Grid Connection Corridor will ensure that access for Local Road Users is maintained. Where works to the Local Highways to facilitate the construction of the grid connection corridor will require traffic management to be installed, this would be for a limited time period and through traffic would be maintained under partial lane closures. Details of all construction traffic activities are included within the **Framework CTMP [APP-206, APP-207]**. Temporary Traffic Management arrangements are included between Paragraphs 5.2.4 and 5.2.8.

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
			the planning boundary of that site, the access and part of the schemes grid connection route. Adverse impacts with these are not acceptable. During the Teams calls, Boom Power Ltd have indicated that it is their current intention for their grid routing to be to the east side of the DCO area at Thorpe Marsh accessing the substation from the east side and therefore there will be no or limited interaction with HJB land, other than for possible use of the access route. However, this could change when detailed design works are undertaken in the future and we note from the DCO that the works proposed on the HJB land are set out in the schedule as Works No4 and Works No 8. As currently defined in the draft DCO, Works 8 are wider than merely use for access as they provide for improvement and construction works to the road itself. We have explained that the access into our site via Marsh Lane and West Circuit is needed on an unrestricted basis not only for current users but the use for the Battery Storage Scheme where access is needed for construction, maintenance, employees and emergency uses on a 24/7 basis. Works to Marsh Lane that interrupted this ability to access the Thorpe Marsh site would not be acceptable to us, however normal access activities that simply kept the road in a useable and free flowing basis should be acceptable.	
RR-016	H J Banks and Company Ltd	Category 1 and 3 interest (freehold owner and occupier)	Our land interests are also covered by and adjacent to Works 4 which relate to the laying of electrical cables. This land is part of the grid route for the Battery Storage Scheme being developed by TMGEHL. While it is highly likely that the TMGEHL's cabling works will be completed well in advance of the DCO works, any interruption or interaction with the BESS cable or works is not acceptable if the western route for the grid connection was to be used.	The Applicant notes this comment and will work with National Grid and others with land interests in this area to facilitate the cable install. The applicant is aware that National Grid are undertaking works at Thorpe Marsh to facilitate the number of projects connecting there, and will review this at the detailed design stage upon the granting of the Development Consent Order.
RR-016	H J Banks and Company Ltd	Category 1 and 3 interest (freehold owner and occupier)	We understand the technical details of the grid connection final routing is not yet available. On this basis and having discussed matters with TMGEHL we are prepared to wait to determine if an interaction agreement will need to be sought by the Boom Power Ltd scheme. Any agreement that Boom Power Ltd may seek to secure in the future with HJB will be subject to Approval of the HJB Board and Banks Group Board and that of TMGEHL at that time. Any such agreement would need to include the following: - • Non-interference with the access into the site from Fosteads Lane, ensuring that 24/7 access is maintained without interruption	The Applicant notes this comment and is committed to negotiating an interaction agreement between parties post consent to facilitate the cable installation should it become necessary following the detailed design phase and confirmation of the works at the Existing National Grid Thorpe Marsh Substation by National Grid. The current routing of the cable, does not interact with HJ Banks, but this is subject to detailed design, and National Grid Confirmation of works, therefore the application currently retains a degree of flexibility for detailed design.

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
			• Non-interference with any aspect of the BESS project during construction, operation, maintenance or other unscheduled works • Non-interference with the procedures set out in the Thorpe Marsh Lagoons Reservoir Emergency Action and statutory responsibilities. • No interaction or interference with the grid connection corridor for TMGEHL's BESS project, be that for construction, maintenance, power import and export or safety works. • Suitable commercial terms to the satisfaction of the Banks Group Board, and payment of HJB and TMGEHL legal and agents fees associated with any agreement.	
RR-016	H J Banks and Company Ltd	Category 1 and 3 interest (freehold owner and occupier)	We remain supportive of the proposed development in principle subject to these matters above. Given the potential for interaction with TMGEHL's BESS development as well as our continuing land interests (and those of our tenants) we are seeking to safeguard our existing rights and those of our tenants and option holders. We recognise that developments such as the one being proposed here can however be subject to change as they move forward. We therefore request that if any amendments to the proposed development are made resulting in a change or clarification of the position which results in potential interaction on the access road and / or our landholding that will affect HJB, we and TMGEHL be notified and given the opportunity to provide comment accordingly. To the extent that HJB are not promoting the proposed development on our land, I can confirm, as landowners, we support and endorse the response to this consultation you have received from TMGEHL.	The Applicant notes this comment and is committed to informing H J Banks and Company Limited of any amendments to the Scheme that impacts its land interests, both during examination of the application and during the development of detailed design post consent.
RR-015	Fidra Energy - Thorpe Marsh Green Energy Hub	NB: Fidra Energy do not have a formal land interest currently recorded in the Book of Reference, but based on their RR and direct discussions with Fidra and HJ Banks & Company Ltd, it is understood they have interests under Option for parts of the H J Banks land. For this reason, their RR is included in this table to reflect the aligned interest with H J Banks.	Representation about Application EN010152 Proposed Fenwick Solar Farm Development DCO We are writing this in response to Application EN010152 for the proposed Fenwick Solar Farm Development. Fidra Energy acquired the development rights and a land option for a total of 1.45GW battery energy storage system ("BESS") project at Thorpe Marsh from H J Banks & Company Limited ("HJB"), via its UK Transition Power Holdings entity in October 2023. This project is named Thorpe Marsh Green Energy Hub Limited ("TMGEH"). Planning consent is expected in early 2025 and full construction will begin in late 2025 / early 2026. The facility will be constructed on the land adjacent (to the west) of National Grid's 400kV substation and Northern Power Grid's 66kV substation. Full commercial operations for the 1.4GW facility connecting into	The Applicant notes this comment and explanation of Fidra Energy's interests.

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
			the 400kV substation is expected by the end of 2027 and for the 50MW project connecting to Northern Power Grid's 66kV substation around 2028.	
RR-015	Fidra Energy - Thorpe Marsh Green Energy Hub	As above	For both these connections, the underground electrical cable route will be west-east along Ash Field Road, until West Circuit Road where it will turn to run north-south alongside West Circuit Road and South Road, until a suitable point to turn west-east again to connect into the substations. This also is the main access route to the project. Fidra Energy and HJB have held two Teams discussions with Boom Power (Helen Standing and Rob Smith) - on 13 May 2024 and 7 January 2025. From these discussions our understanding is that Boom Power's current plans in relation to the Fenwick Solar Farm development are to: • Begin construction in 2030; • Begin commercial operations in 2032 – with a desire to bring forward both if possible; • Connect to the National Grid substation via the north-east of their redline boundary (RLB) around the National grid substation - avoiding West Circuit Rd; and • Use Fordstead Lane / Marsh Lane / South Road / West Circuit road as a potential access route. Boom Power further advised that the routes and technical details have not yet been finalised. This is not unusual given the stage of the development. In these meetings we explained to Boom Power our potential areas of interaction/concern as outlined below.	The Applicant can confirm the meetings referred to occurred, and the description of the intended programme and works for the Scheme are correct.
RR-015	Fidra Energy - Thorpe Marsh Green Energy Hub	As above.	Potential Interaction with TMGEH Project Based on the Fenwick Solar DCO and its RLB there are two potential impacts on the TMGEH project. These are both referenced in EN010152/APP/2.2 Works Plan Sheet 10 of 11. 1. Cabling route to the substation (Works 4 and 8) Boom Power have advised that it will most likely be entering the national grid substation via the north-east. However, in the event plans change and it wishes to use the western side of the RLB for any cabling works, the connection cable would run close to / cross the TMGEH underground electrical connections – which will likely be installed by the time of the Fenwick Solar construction. As such, the Fenwick Solar cable will need to be designed and routed to avoid any adverse effects on the TMGEH cables and ensure electrical integrity (during both construction and operations / maintenance).	As with the response to RR-016 above, the Applicant can confirm that current designs for the Scheme avoid interaction with the TMGEH project. However, should this change at the point of detailed design, the Applicant commits to further engagement with Fidra Energy (including on a interaction agreement if necessary) to ensure adverse effects on the Thorpe Marsh Green Energy Hub assets are avoided.
RR-015	Fidra Energy - Thorpe Marsh Green Energy Hub	As above.	2. Access (Works 8)	The Applicant notes the response provided by Thorpe Marsh Green Energy Hub, and any works to facilitate

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
			Access to the TMGEH project (and for others with rights of access to the area) is via Fordstead Lane / Marsh Lane / South Road / West Circuit. This forms part of the Fenwick Solar DCO. The associated works package 8 allows for works to facilitate access such as widening and surfacing. It is essential that this route remains useable without interruption (24/7) during construction, operations and maintenance for TMGEH (and also for other users). This is essential not just for operational reasons but for safety.	access to the Grid Connection Corridor would ensure that access for Local Road Users is maintained. Any works to the Local Highways to facilitate the construction of the Grid Connection Corridor will require traffic management to be installed, however this would be for a limited time period and through traffic would be maintained 24/7 under partial lane closures. Details of all construction traffic activities are included within the **Framework CTMP [APP-206, APP-207]**.
RR-015	Fidra Energy - Thorpe Marsh Green Energy Hub	As above.	Next Stage Having discussed the plans and these matters with Boom Power and HJB, Fidra Energy is prepared to wait to until Boom Power's plans are progressed further to see whether an interaction agreement will be required. Such an agreement would need to address the cabling route and access items outlined above. In the meantime we have requested that Boom Power remain in contact and in particular inform us of any changes relating to the potential interaction between the projects (for example technical design / route for connection to the substation, construction plan and operational/maintenance plans). TMGEH is supportive of large-scale infrastructure projects such as this and – subject to the above - is not objecting to the Fenwick Solar development. Thank you for the opportunity to submit a response. Yours sincerely David Murray Growth and Strategy Manager	The Applicant notes this comment and is committed to working with Thorpe Marsh Green Energy Hub if an interaction agreement becomes necessary.
RR-024	Christopher Tonkinson	Category 1 (Subsoil Interest)	I would like to register my objection to the proposals and raise my summary of concerns below: Size and scale of the proposed development will take over most of Fenwick's and a huge element of Moss parish and effecting almost all of the public access areas , footpaths and bridle ways, roads etc.	The Government has identified through its energy policy, most recently in the NPS EN-1 and EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and wide-ranging stakeholder engagement. All comments received

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
				regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable, as set out in the **Consultation Report [APP-022]** and summarised in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]**. As set out in the **Design and Access Statement [APP-191]**, design principles have guided, and will continue to guide, the Scheme from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures.
RR-024	Christopher Tonkinson	Category 1 (subsoil Interest)	Environmental impact concerns as to the impact during the construction phase and for the next c 40 years turning what was once an area of wide biodiversity and tranquillity into an noisy and industrialised area effecting land, wildlife and the community in a way never seen and that should not be under rated by the inspectorate.	An assessment of noise impacts from equipment, such as transformers and inverters, on residential receptors is presented in **Volume I, Chapter 11: Noise and Vibration [APP-063]** of the Environmental Statement. With proposed mitigation measures in place, noise from equipment is not considered to be significant and is likely to be less than ambient noise levels. Working hours are set out in the **Framework CEMP [APP-196]** with the use of high noise generating plant during construction limited to the hours between 08:00 and 18:00 from Monday to Friday and between 08:00 and 13:00 on Saturday. There will be no works undertaken on Sundays or Bank Holidays unless crucial to construction (for example HDD which must be a continuous activity) or in an emergency. The BESS Area and On-Site Substation do emit some noise when operating and these have therefore been carefully located with respect to residential receptors. Operational noise impacts are assessed in **Volume I, Chapter 11: Noise and Vibration [APP-063]** which concludes that operational impacts will be negligible at all residential receptors. Amenity related impacts will be managed to acceptable levels through the suite of construction, operation and decommissioning management plans proposed and secured via Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Group will be also set up and is secured by Requirement 3 in Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Officer (or alternative role) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the impacts of the Scheme. The implementation of requirement 3 will allow feedback on

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
				impacts of the Scheme and mitigation measures to be considered and acted upon if required. **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**.
RR-024	Christopher Tonkinson	Category 1 (subsoil Interest)	The huge coverage of the scheme means there will be a loss of agricultural land and disruption to the area on a scale never witnessed like this in 100's of years causing loss of opportunities and jobs for the rural community	<u>Loss of agricultural land</u> In identifying areas that could be suitable for a Solar PV Site the Applicant considered locations that would avoid BMV agricultural land. To identify these locations the Applicant used provisional Agricultural Land Classification (ALC) mapping published by Natural England. The results of this exercise are set out in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055].** As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-064]** of the Environmental Statement, an agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV land. With the exception of a relatively small area of BMV land proposed for structural planting (0.78 ha), impacts on this BMV land will be temporary and reversible. In addition, due to the small scale of this BMV land, it is not currently farmed for high-quality agricultural food production and was recently used for biomass crops. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
				activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**. Prior to the start of construction, a detailed SMP will be submitted to and approved by the local authority (as outlined in the **Framework CEMP [APP-196]** and secured by Requirement 15 of Schedule 2 to the **Draft DCO [APP-220]**). This will ensure soils are not degraded and farming activities can re-commence following completion of the construction phase along the Grid Connection Corridor and decommissioning phase within the Solar PV Site. <u>Economic Impacts</u> As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]**, GVA per construction worker in the Yorkshire and the Humber is estimated to be £63,314 per head. By applying this figure to the gross direct construction workers generated by the Scheme, it is estimated that construction would contribute approximately £12.6 million to the national economy, of which £5.7 million would be within a 60-minute drive time from the Order limits. Construction activities associated with the Scheme will provide access to employment in this phase. Similar economic benefits are also anticipated for the decommissioning phase. The application includes a **Framework SSCEP [APP-204]** which identifies potential opportunities for activities relating to skills, supply chain and employment that the Applicant could take forward post-consent. A detailed SSCEP is secured by requirement 16 of the **Draft DCO [APP-220]** and requires the Plan to be substantially in accordance with the Framework Skills, Supply Chain and Employment Management Plan.
RR-024	Christopher Tonkinson	Category 1 (subsoil Interest)	The introduction of battery storage and a substation to facilitate the development and for no other gain to the locality should also be seriously questioned as there is one proposed at Thorpe Marsh on a brown field former power station site (where this proposal will join the grid) there are plans for battery storage for over 320,000 homes, why the need for this here on green field land	The BESS Area has a direct relationship with the Solar PV Site and will support its operation by storing electricity produced during times of peak capacity until it needs to be released. This increases the efficiency of the Solar PV Site as a renewable energy project aiding both its operation as a generating station and the export of electricity to the National Electricity Transmission System. The need to have flexibility and integrated technologies, such as BESS Containers, is recognised by the Overarching National Policy Statement for Energy (Paragraphs 3.3.5 and 3.3.6). In addition, Paragraph 2.10.10 of the National Policy Statement for Renewable Energy provides policy support for schemes that include co-located solar and storage technologies because both

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
				technologies are needed and co-location maximises the efficiency of land use. In addition, the BESS system will provide the ability to import energy from the national grid at times of excess electricity generation, discharging the stored energy at times of peak demand and assisting in balancing the UK's electricity supplies. The BESS Area component of both the Scheme and the battery storage facility identified for Thorpe Marsh are part of the response to the need to store renewable power generated during periods of oversupply of renewable electricity, which is then released when there is insufficient supply of renewable generation (such as when there is less sunshine). Therefore, the projects are complementary in that they will help ensure reliable and stable electricity grid operation at times of peak demand, thus helping to improve the UK's energy security over the long term. Further information regarding the need for the Scheme can be found in the **Statement of Need [APP-192]** and an appraisal of the Scheme against relevant local and national planning policy can be found in the **Planning Statement [APP-246]**.
RR-024	Christopher Tonkinson	Category 1 (subsoil Interest)	The huge effect on the community, road infrastructure, safety and the right for the community peaceful enjoyment will be negatively affected whist construction during c 2 years and for the next 40 years with the schemes visual, noise and environmental effects.	<u>Traffic Impact</u> A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within **ES Volume I, Chapter 13: Transport and Access [APP-065]** of the Environmental Statement. Traffic during the operation and maintenance phase would be minimal. The **Transport Assessment [APP-179]** and **Framework CTMP [APP-206, APP-207]** provide full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes measures such as suitable agreed Heavy Good Vehicle routes and timing restrictions, the use of traffic marshals at site accesses and crossing points, and the development of a communications strategy for those working on the Scheme. A detailed Construction Traffic Management Plan (which must substantially accord with the Framework CTMP) will need to be approved post consent prior to construction with the relevant local authority and this is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**. <u>Noise Impact</u>

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
				An assessment of noise impacts from equipment, such as transformers and inverters, on residential receptors is presented in **Volume I, Chapter 11: Noise and Vibration [APP-063]** of the Environmental Statement. With proposed mitigation measures in place, noise from equipment is not considered to be significant and is likely to be less than ambient noise levels. Working hours are set out in the **Framework CEMP [APP-196]** with the use of high noise generating plant limited to the hours between 08:00 and 18:00 from Monday to Friday and between 08:00 and 13:00 on Saturday. There will be no works undertaken on Sundays or Bank Holidays unless crucial to construction (for example HDD which must be a continuous activity) or in an emergency. <u>Visual Impact</u> The Landscape and Visual Impact Assessment in **ES Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** recognises that there will be some visual impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme. Where the potential for adverse visual impacts has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Whilst there will be views of the Scheme from some places in year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A. A detailed LEMP (which must substantially accord with the Framework Plan) will need to be approved post consent prior to construction with the relevant local authority and this is secured by Requirement 6 in Schedule 2 to the **Draft DCO [APP-220]**. <u>Community Impacts</u> Community amenity related impacts will be managed to acceptable levels through the suite of construction, operation and decommissioning management plans proposed and secured via Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Group will be also set up and is secured by Requirement 3 in Schedule 2 of the

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
				Draft DCO [APP-220]. A Community Liaison Officer (or alternative role) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the impacts of the Scheme. The implementation of Requirement 3 will allow feedback on impacts of the Scheme and mitigation measures to be considered and acted upon if required.
RR-024	Christopher Tonkinson	Category 1 (subsoil Interest)	I would also question the impartiality of the reports included as part of the planning application, these have been provided by and on the instructions of the developer I would expect the inspector insist on independent review and fact checking of these findings I am not against solar or renewable energy in any way however I believe not enough though if any has been given to finding alternative brown field or more suitable sites in the area or even across the country. I also understand the need to move towards clean energy but this should not be at any cost be that economical, environmental or political and would suggest that any decision on something of this scale should not be taken until the NESO report has been produced and a national strategy for storage and power generation is decided.	The assessments have been undertaken by a team of specialists with relevant qualifications and experience in their respective fields. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and wide-ranging stakeholder engagement. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable, as set out in the **Consultation Report [APP-022]** and summarised in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** which also includes a thorough consideration of alternative and brownfield sites. The Government has identified through its energy policy, most recently in the NPS EN-1 and NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. The **Statement of Need [APP-192]** also notes that, whilst decentralised generation has an important role to play in decarbonisation, 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. Therefore, smaller scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, the need for large-scale, ground-mounted solar like this Scheme. Brownfield land was considered for the Scheme following a review of the local authority brownfield land register. However, it was concluded that there was no available or suitable brownfield land for the Scheme as it would compete or be in conflict with local planning policy seeking to deliver housing and mixed-use developments, and the land next to the Existing National Grid Thorpe Marsh Substation was being developed for another

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
				energy project. This is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement.
RR-026	Clifford Braham	Category 1 (subsoil Interest)	We attended an open day at Fenwick Institute earlier this year, we spoke with one of your representatives about our concerns with your project having a detrimental impact to our business and our privacy as a resident. We reside at (Redacted). We were assured by your representative that it would have no detriment to our property or business, however the letter we have received paints a completely different picture. On the map with the letter there is an area labelled order limits which runs all the way down the side of our property and to the rear of our property, can you please confirm What is this area going to be used for, is it for the siting of the battery energy storage system. Will there be a constant thoroughfare for vehicles used for the Solar farm Will the hedgerow be removed leaving our property exposed to all and sundry how much noise impact will we receive All of this will have a massive impact on the privacy to our property. As well as a detrimental impact on the value of our property and possibly very off putting to potential vendors should we decide to sell in the future.	Works Areas Works to the east of Moss are shown on Sheet 6 of the **Works Plan [APP-214]** and mainly comprises of Works 4 (a) and (b) which allow the installation of the grid connection corridor cable between the Solar PV Site and the Existing National Grid Thorpe Marsh Substation. Construction activities within Works 4 (a) and (b) are not likely to be undertaken immediately adjacent to the interest party's property as the proposed indicative cable route passes on the eastern side of the cable corridor. The cable will be buried and, therefore, no above ground infrastructure will remain in this area following the completion of the proposed cable works. Also, any hedgerow that is adjacent to the interested party's property will be unaffected by the works. Access to the interested party's property will be retained at all times. Any solar panel or battery energy storage infrastructure will be sited further to the north, with the battery storage closer to Haggs Lane. The location of the different types of infrastructure (including solar panels and the battery storage) are presented on **Volume II, Figure 2-3 Indicative Site Layout [APP-074].** Impact on Privacy As noted above, given there will be no above ground infrastructure adjacent to the interest party's property, it not considered that there would be any long term impacts on the privacy. Noise Impacts An assessment of noise impacts from equipment, such as transformers and inverters, on residential receptors is presented in **Volume I, Chapter 11: Noise and Vibration [APP-063]**. With proposed mitigation measures in place, noise from equipment is not considered to be significant and is likely to be less than ambient noise levels. Working hours are set out in the **Framework CEMP [APP-196]** with the use of high noise generating plant limited to the hours between 08:00 and 18:00 from Monday to Friday and between 08:00 and 13:00 on Saturday. There will be no works undertaken on Sundays or Bank Holidays unless crucial to construction (for example HDD which must be a continuous activity) or in an emergency.

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
				The BESS Area and On-Site Substation do emit some noise when operating and these have therefore been carefully located with respect to residential receptors. Operational noise impacts are assessed in **Volume I, Chapter 11: Noise and Vibration [APP-063]** which concludes that operational impacts will be negligible at all residential receptors. Amenity related impacts will be managed to acceptable levels through the suite of construction, operation and decommissioning management plans proposed and secured via Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Group will be also set up and is secured by Requirement 3 in Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Officer (or alternative role) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the impacts of the Scheme. The implementation of Requirement 3 will allow feedback on impacts of the Scheme and mitigation measures to be considered and acted upon if required.
RR-026	Clifford Braham	Category 1 (subsoil Interest)	MOST IMPORTANTLY We run a haulage Company for which we have had planning for 30 plus years, something you have clearly not taken into account. We have 8 HGV articulated Trucks and Trailers which operate from the premises daily 7 days per week. These vehicles need access to and from the property at least twice per day. It states on the letter we received that you are considering underground cabling which i am guessing will be put in the area hi lighted blue (new rights) on the map you provided. So Again if you could confirm answers to the below How do you propose to lay the cables, and what impact will this have on the road outside our property. How will we gain access to our property both in and out with articulated vehicles, this business is our living and only source of income. Disturbance to our business will not only have a massive impact on us financially but will also affect relations with our clients. I cannot stress how frustrated we feel and how opposed we are to this project. I agree with green energy, however im sure there are more suitable sites that dont impact residents and businesses.	Details of traffic numbers associated with the scheme are provided within Section 6 of **Volume III, Appendix 13-4: Transport Assessment [APP-179]**. The Applicant has sought to limit the impact on the village of Moss by implementing a split access strategy which caters for the construction workforce and construction HGV movements, which is detailed in Section 5.5 of **Volume III, Appendix 13-4: Transport Assessment [APP-179]**. The construction of the Scheme is anticipated to take approximately 2 years, during which the core construction working hours would be 7am–7pm Monday to Friday and 7am–1pm Saturdays. The majority (75%) of construction worker vehicles (predominantly small private cars) will access the Order limits off Fenwick Common Lane and Haggs Lane using Access 5, which will act as a one way access, and will exit onto Moss Road via Access 1. The Applicant anticipates that approximately 100 construction worker vehicles will egress from Access 1 onto Moss Road and travel westbound through the village of Moss in the PM peak construction hour (7pm–8pm). For construction HGV movements, access and egress from the Order limits will be via Access 1. HGV movements are not permitted to use Access 5 off

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
				Fenwick Common Lane and Haggs Lane as the junction of Moss Road and Fenwick Common Lane is too small. **Volume III, Appendix 13-4: Transport Assessment [APP-179]** estimates that up to 36 two-way HGV movements per day would pass along Moss Road enroute to using Access Point 1. These numbers are during the peak of construction and have been assessed to show a worst-case scenario – meaning there are unlikely to be this many movements through the entire construction phase. For the installation of the grid connection corridor, there will be a haul road constructed between Access 2 on Moss Road and Access 3 on Trumfleet Lane. This will enable construction traffic to travel to the southeast of the village without using local roads within the village of Moss. It is assumed in **Volume III, Appendix 13-4: Transport Assessment [APP-179]** that up to 6 two-way HGV movements will utilise this haul road between Access 2 and 3. This haul road will be removed following the completion of the grid connection corridor construction works. The **Framework CTMP [APP-206, APP-207]** provides details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. Where works to the Local Highways to facilitate the construction of the grid connection corridor will require traffic management to be installed, this would be for a limited time period and through traffic would be maintained under partial lane closures. Details of all construction traffic activities are included within the **Framework CTMP [APP-206, APP-207]**, with Temporary Traffic Management arrangements outlined between Paragraphs 5.2.4 and 5.2.8.
RR-030	Debbie Braham	Category 1 (subsoil Interest)	We attended an open day at Fenwick Institute earlier this year, we spoke with one of your representatives about our concerns with your project having a detrimental impact to our business and our privacy as a resident. We reside at (Redacted). We were assured by your representative that it would have no detriment to our property or business, however the letter we have received paints a completely different picture. On the map with the letter there is an area labelled order limits which runs all the way down the side of our property and to the rear of our property, can you please confirm What is this area going to be used for, is it for the siting of the battery energy storage system.	RR-030 is a duplication of RR-026 and therefore the same response applies.

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			Will there be a constant thoroughfare for vehicles used for the Solar farm Will the hedgerow be removed leaving our property exposed to all and sundry how much noise impact will we receive All of this will have a massive impact on the privacy to our property. As well as a detrimental impact on the value of our property and possibly very off putting to potential vendors should we decide to sell in the future. MOST IMPORTANTLY We run a haulage Company for which we have had planning for 30 plus years, something you have clearly not taken into account. We have 8 HGV articulated Trucks and Trailers which operate from the premises daily 7 days per week. These vehicles need access to and from the property at least twice per day. It states on the letter we received that you are considering underground cabling which i am guessing will be put in the area hi lighted blue (new rights) on the map you provided. So Again if you could confirm answers to the below How do you propose to lay the cables, and what impact will this have on the road outside our property. How will we gain access to our property both in and out with articulated vehicles, this business is our living and only source of income. Disturbance to our business will not only have a massive impact on us financially but will also affect relations with our clients. I cannot stress how frustrated we feel and how opposed we are to this project. I agree with green energy, however im sure there are more suitable sites that dont impact residents and businesses.	
RR-031	Elizabeth Lois Dobbin	Category 1 (subsoil Interest)	There will be massive increase in heavy traffic for a long time. I have to rely on my car to access the nearest place, Askern, for shopping and health care. (Redacted) I am very concerned that I will not be able to easily access Askern when the projected amount of very heavy traffic is filling the roads I need to use.	Details of traffic numbers associated with the scheme are provided within Section 6 of **Volume III, Appendix 13-4: Transport Assessment [APP-179]**. As shown in Table 6 within this report, the large majority of traffic movements will be associated with staff vehicles, which will only be travelling between the periods of 06:00-07:00 and 19:00-20:00, in conjunction with shift start and end times. In terms of staff traffic movements through Askern during these periods, 108 one-way traffic movements are expected in the AM period with 108 in the PM period. Traffic movements during other periods of the working day (e.g. 09:00-17:00) will be restricted to HGV movements only, where

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
				up to 6 additional two-way movements per hour can be expected through Askern (a total of 36 two-way movements per day – some hours will have less than 6 two-way movements). This number is associated with the peak of construction and would not be evident throughout the entirety of the construction phase, which in itself is a temporary effect. The **Framework CTMP [APP-206, APP-207]** provides details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads and is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**.
RR-049	Stephen Fowle	Category 1 (subsoil Interest)	We have been told this solar farm will produce electricity for 78,000 homes which seems great but I have been told that this is not 24 ,7. And still needs other sauces of electricity production so how long does this supply power the 78,000 homes. The battery storage imports and exports electricity. This surly is a separate business. Where does this imported electricity come from. ??? Bought cheap on European markets then feed into battery storage imports then resold as solar energy. Come on stop taking the (Redacted) !!!! The amount of of land acres taken doses not justified the little amount of electricity produced. 11% to 20% efficient. Who can say this justified covering so muck land area. This doesn't justify the destruction of of the country side for so little gain these. Solar farms are just political vanity. How dose the great British people's sacrifice justify the cost this is not going to reduce global warming unless the rest of the world contributes. And really are our electricity bills going to come down. We already pay more than countries like Cambodia. , Vietnam for electricity these countries don't even have there own power stations. So I think (Redacted) and your delusional dreams. Merry Christmas.	The Scheme has a 237.5MW connection at the Existing National Grid Thorpe Marsh Substation. As explained in **Volume I, Chapter 6: Climate Change [APP-063]**, renewable energy generation from the Scheme during the first full year of operation and maintenance is estimated to be 352,766 MWh. Taking into consideration a 2% reduction in solar PV panel performance during the first year and applying a 0.45% degradation factor for each subsequent year, this gives a total energy generation figure of 12,940,146 MWh over the assessed 40-year Scheme design life. Ofgem estimates that the typical household in Britain uses 2,700 kWh of electricity per annum. Therefore, the Scheme will generate enough electricity to power approximately 120,000 homes per annum. The BESS system will have the ability to store electricity generated from the Scheme and/or import energy from the grid at times of excess generation, discharging the stored energy at times of peak demand and assisting in balancing UK's electricity supplies. The Government has identified through its energy policy, most recently in the EN-1 and the NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme.

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
RR-052	Sylvia Wisniewska	Category 1 (subsoil Interest)	The impact solar farm will have on rural location and everyday lives to residents, nature and protected species, including building solar farm and the consequences this will have on noise, traffic and condition of roads that are not well maintained as it is.	As set out in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]**, **Volume I, Chapter 11: Noise and Vibration [APP-063]** and **Volume I, Chapter 13: Transport and Access [APP-066]** of the Environmental Statement, measures to minimise community disturbance from noise, lighting and traffic and minimise impacts on visual amenity as a result of the Scheme are provided in the **Framework CEMP [APP-196],** the **Framework CTMP [APP-206, APP-207]**, and the **Framework OEMP [APP-197]**. Detailed management plans will need to be approved post consent, and prior to construction, by City of Doncaster Council. These detailed management plans must substantially accord with the framework management plans, meaning the Applicant must implement mitigation which has been promised, and are secured by Requirements 11 to 13 in Schedule 2 to the **Draft DCO [APP-220]**. A Community Liaison Group will be also set up and is secured by Requirement 3 in Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Officer (or alternative role) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the impacts of the Scheme. The implementation of Requirement 3 will allow feedback on impacts of the Scheme and mitigation measures to be considered and acted upon if required. **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**.

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
AS-003	Broadfield Law UK LLP on behalf of Elba Securities and Able UK Ltd	Category 1 (freehold and occupation)	Dear Sir or Madam Project: Fenwick Solar Farm (PINS Reference Number: EN010152) Relevant Representation of Able UK Limited and Elba Securities Limited 1. We write on behalf of both Able UK Limited (AUK) and Elba Securities Limited (ESL); AUK is the UK Asset Manager for ESL which is a company incorporated in Jersey. AUK and ESL (collectively referred to as 'ABLE' hereafter) object to the Fenwick Solar Farm Project (the Project), as proposed by Fenwick Solar Project Limited (the Applicant). This letter constitutes a Relevant Representation (RR) made by ABLE. 2. We acknowledge that the deadline for submission of RRs was 24 January 2025, however due to unavoidable circumstances it has not been possible to meet that deadline, and we apologise for this. ABLE are affected parties given the direct impact the Project has on their land interests, making it a Person with an Interest in Land for the purposes of section 56 of the Planning Act 2008 (PA 2008) and Regulation 16 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.	The Applicant notes this comment.
AS-003	Broadfield Law UK LLP on behalf of Elba Securities and ABLEUK Ltd	Category 1 (freehold and occupation)	Objection to Compulsory Acquisition of ABLE's Land Interests 3. ABLE strongly objects to the Applicant's case for compulsorily acquiring its land interests in carrying out the Project as set out in the Book of Reference (BoR) and corresponding Land Plans (LP). The Applicant seeks to acquire rights over the following plots, which fall within Category 1 (and in some cases Category 2 and 3) land interests held by ABLE: a. 9/09 – BoR (page 100), LP (sheet 9) b. 9/15 – BoR (page 104), LP (sheets 9 and 10) c. 10/03 – BoR (page 105), LP (sheets 9 and 10) d. 10/05 – BoR (page 106), LP (sheet 10) e. 10/06 – BoR (page 108), LP (sheet 10) f. 10/07 – BoR (page 109), LP (sheet 10) g. 10/08 – BoR (page 111), LP (sheet 10) h. 10/09 – BoR (page 113), LP (sheet 10) i. 10/10 – BoR (page 114), LP (sheet 10) j. 10/13 – BoR (page 118), LP (sheet 10) 4. ABLE objects to the acquisition of any of these land interests, but particularly plot 10/05 which is of strategic importance to ABLE. Plot 10/05 concerns what was historically the Thorpe Marsh Power Station site, which ABLE acquired in 1995. Since then, the site has been subject to substantial investment and decommissioning efforts. The	The Applicant notes the objection by Elba Securities and ABLE UK Ltd (Able) to the acquisition of its land, particularly plot 10/05. Since Able's relevant representation and comments made at Issue Specific Hearing 1, the Applicant and Able have had initial discussions regarding an appropriate location for the cable route through Able's land, with the intention to capture this in a voluntary property agreement. The Applicant remains committed to continuing these discussions with Able. The Applicant does note that the Electricity Act Consent provided for the Thorpe Marsh (Combined Cycle Gas Turbine (CCGT) mentioned within Able's relevant representation as granted 31 October 2011 includes a condition at 4(2) providing that "*The commencement of any phase of the Development shall not be later than five years from the date of this consent, or such longer period as the Secretary of State may hereafter direct in writing*." The Applicant does not understand that commencement of the Thorpe Marsh CCGT Development occurred by 31 October 2016, nor that a longer period was granted by the Secretary of State. As such, the Applicant understands that the consent referred to has since lapsed and cannot be relied upon for future development at the site. ABLE's response appears to acknowledge this in part by indicating that

Ref No.	Name	Land Interest	Comments from Relevant Representations	Response to Relevant Representation
			work undertaken on the site thus far was undertaken to enable the construction of a new 1500 MW capacity electricity generating station. The generating station obtained consent from Department of Energy and Climate Change on 31 October 2011 pursuant to Section 36 of the Electricity Act 1989 (view here: Thorpe Marsh CCGT Consent). 5. Due to changes in energy policy the generating station has not been constructed, but the site's immediate access to the National Grid infrastructure make it a prime location for other development requiring grid access.	instead the site would be used for "*other development requiring grid access*".
AS-003	Broadfield Law UK LLP on behalf of Elba Securities and Able UK Ltd	Category 1 (freehold and occupation)	6. ABLE disputes the Applicant's rationale for compulsory acquisition of ABLE's land, particularly plot 10/05, given that it forms part of a site that has previously been consented for major development. The proposed compulsory acquisition would directly conflict with the significant work undertaken over several years and undermine the long-term strategic development objectives of the site as envisaged by ABLE. This would be a highly disruptive and unnecessary outcome that would derail ABLE's efforts invested thus far. The Applicant has failed to provide sufficient justification as to why ABLE's land specifically is crucial for the Project, and has not demonstrated that reasonable alternative locations for the development generally and the cable route in particular, have been adequately explored. 7. Section 122(3) PA 2008 stipulates that the Secretary of State may grant compulsory acquisition powers to a developer when 'there is a compelling case in the public interest for the land to be acquired compulsorily'. In this instance, the Applicant has not met this threshold, as the land is being developed by ABLE and such development would be constrained by the presence of underground cables. We note that NPS EN-3 (Renewable Energy Infrastructure) at paragraphs 2.10.28 and 2.10.29 provide that *'solar is a highly flexible technology and as such can be deployed on a wide variety of land types'*, whereby in considering the suitability of a site, the Applicant should *'where possible, utilise suitable previously developed land'*. It is both confusing and irrational that the Applicant has decided to select plot 10/05, which is a site that has previously obtained consent for critical national infrastructure and for which ABLE will most likely submitting an application for development that may itself constitute a Nationally Significant Infrastructure Project.	The Applicant remains committed to continuing to engage with Able in respect of reaching agreed property agreements for the cable route and any associated easements, such that both parties interests can be met. However, the Applicant does not agree with the suggestion that the Applicant has failed to outline the compelling case in the public interest for the land to be compulsorily acquired. The Applicant refers to the **Statement of Reasons [APP-018]** which sets out in detail (within Section 7 in particular) the compelling case for the use of compulsory acquisition powers, and retains its position in respect of these powers subject to the parties coming to an agreed position. The references to Paragraphs 2.10.28 and 2.10.29 in NPS EN-3 relate to the site selection process for Solar PV Site, i.e. the land in which Solar PV Panels will be placed. Plot 10/05 is within the Grid Connection Corridor for the Scheme, and any Scheme infrastructure will be for the laying of cables – as such these Paragraphs are not relevant to the particular need for Plot 10/05. The Applicant considers it is clear why Plot 10/05 is necessary for the cable connection of the Scheme to the Grid, given the Applicant has an agreed Grid Connection with National Grid at the Thorpe Marsh Substation site immediately adjacent to Plot 10/05 in Plot 10/06. The Applicant undertook a thorough site selection search within the surrounding area to this Grid Connection as outlined in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** which resulted in the selection of the Principal Solar PV Site to the north of the Existing National Grid Thorpe Marsh Substation. The Grid Connection Corridor has been selected for the most direct connection to the National Grid Substation, so as to minimise effects. The Applicant considers another route to avoid Plot 10/05 (for example circumventing the site to connect into the substation from an alternative

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				direction to the east or west of Plot 10/06) would be inefficient, particularly given the exact location of the grid connection within Plot 10/06 has yet to be confirmed, so doing so risks the cabling coming into the wrong side of Plot 10/06.
AS-003	Broadfield Law UK LLP on behalf of Elba Securities and Able UK Ltd	Category 1 (freehold and occupation)	8. ABLE maintains its position that any form of mitigation negotiated with the Applicant in respect of the plots identified at paragraph 3 above will only be acceptable where it is deemed unavoidable to use ABLE and the mitigation does not impede the realisation of ABLE's plans. Any agreement or arrangement reached between ABLE and the Applicant to accommodate any aspect of the Project would be entirely at ABLE's discretion. 9. Mitigation measures, if deemed unavoidable, should address the following list of non-exhaustive concerns: a. Any infrastructure installation on ABLE's land must not obstruct or restrict ABLE's ability to progress with any development brought forward in the future, including the location of such installation and its timing. b. If ABLE's land is disturbed during the construction or operation of the Project, it is imperative that such land is restored to its original condition, thereby allowing future development of the land to continue as planned. c. Should ABLE allow the development to progress on its land with suitable mitigation, ABLE is entitled to compensation for any temporary or permanent interference.	The Applicant remains ready and willing to continue discussions with Able as to the nature of Able's future development and how the Scheme can appropriately be sited and designed to avoid conflicts, subject to the operational requirements of the Scheme. The Applicant can confirm that any disturbance to land caused during construction would be restored. However, the Applicant continues to seek compulsory acquisition powers in the event that such agreement cannot be reached and reiterates its position that a compelling case for the award and use of those powers has been appropriately set out within the **Statement of Reasons [APP-018]**.
AS-003	Broadfield Law UK LLP on behalf of Elba Securities and Able UK Ltd	Category 1 (freehold and occupation)	10. Given ABLE's development plans, we request that the Planning Inspectorate reject the Applicant's request for compulsory acquisition of the relevant plots. However, if elements of the Project must pass through ABLE's land, particularly parcel 10/05, we request that the Applicant engages in meaningful dialogue with ABLE to agree adequate mitigation measures to reach a satisfactory position prior to any work commencing. 11. Any costs incurred by ABLE in dealing with this application should be met by the Applicant.	As set out above, the Applicant remains ready and willing to continue discussions with Able as to the nature of Able's future development and how the Scheme can appropriately be sited and designed to avoid conflicts, subject to the operational requirements of the Scheme. In respect of the comment on costs, the Applicant notes the Ministry of Housing, Communities and Local Government Guidance *Planning Act 2008: awards of costs- examinations of applications for development consent orders* which provides in Part B at Paragraph 6 that all parties will normally be expected to meet their own costs in respect of the examination of applications for orders granting development consent under the Planning Act 2008.

2.6 Public Comment

Table 2.15 Applicant's Response to Relevant Representations – Public Comments

Ref No.	Comments from Relevant Representations	Response to Relevant Representation
RR-010	We attended an open day at Fenwick Institute earlier this year, we spoke with one of your representatives about our concerns with your project having a detrimental impact to our business and our privacy as a resident. We reside at (Redacted). We were assured by your representative that it would have no detriment to our property or business, however the letter we have received paints a completely different picture. On the map with the letter there is an area labelled order limits which runs all the way down the side of our property and to the rear of our property, can you please confirm What is this area going to be used for, is it for the siting of the battery energy storage system. Will there be a constant thoroughfare for vehicles used for the Solar farm Will the hedgerow be removed leaving our property exposed to all and sundry how much noise impact will we receive All of this will have a massive impact on the privacy to our property. As well as a detrimental impact on the value of our property and possibly very off putting to potential vendors should we decide to sell in the future. MOST IMPORTANTLY We run a haulage Company for which we have had planning for 30 plus years, something you have clearly not taken into account. We have 8 HGV articulated Trucks and Trailers which operate from the premises daily 7 days per week. These vehicles need access to and from the property at least twice per day. It states on the letter we received that you are considering underground cabling which i am guessing will be put in the area hi lighted blue (new rights) on the map you provided. So Again if you could confirm answers to the below How do you propose to lay the cables, and what impact will this have on the road outside our property. How will we gain access to our property both in and out with articulated vehicles, this business is our living and only source of income. Disturbance to our business will not only have a massive impact on us financially but will also affect relations with our clients. I cannot stress how frustrated we feel and how opposed we are to this project. I agree with green energy, however im sure there are more suitable sites that dont impact residents and businesses.	Please see response to RR-026 in table 2-14 of 'Applicant's Comments on Relevant Representations – Persons with Interest in Land.'
RR-012	This is a moderate scale solar PV application, whose design, or approval thereof, may be regarded as a template for further applications, including common lands such as the one we own. I feel it is important that we get to appreciate both the design constraints (if any) of such developments, and the processes that such projects will pass through from conception to completion. This project has, at first glance, all the characteristics of a single objective - a solar array - and sufficient - possibly literal - shrubbery, to the exclusion of all other considerations, in the quest for an energy secure future.	The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and wide-ranging stakeholder engagement. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable. As set out in the **Design and Access Statement [APP-191]**, design principles have guided, and will continue to guide, the Scheme from an early stage to develop a good design that balances the need to maximise renewable energy

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		generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures.
RR-014, RR-033, RR-037	The construction period will effect our daily life of our residents with the effect extra traffic, specifically large trucks and wagons on already damaged roads and single track lanes which already have daily farm, haulage, delivery truck traffic. These lanes are used as a rat race during periods of up to one week, when the two nearby railway crossings are closed for repairs and worse still, for emergency closures due to damage/accidents on the line, instead of using the official diversion. DMBC are well aware of this problem with local traffic. These single track lanes have NO passing places or turning areas and damage occurs regularly from traffic cutting up the grass verges and damaging hedgerows. We live on one of these lanes with no paths and when extra traffic is using the lanes, they become even more dangerous to walk, horse ride, dog walk and are not safe to use for pedestrians. We have elderly residents using motability scooters and walkers which will too dangerous to use. The alternative routes for the project traffic will take many extra mileage for project workers/delivery and as now, will NOT be used and the rat races will be used through Fenwick and Haywood.	As indicated within Section 5.5 of the **Volume III, Appendix 13-4: Transport Assessment [APP-179]** which describes the vehicle access arrangements and routing, no construction traffic is expected to travel through Fenwick village or on roads in Haywood. All construction traffic associated with the Solar PV Site will access via either the Fenwick Common Lane/Haggs Lane access (with vehicles accessing Fenwick Common Lane off Moss Road) or the access from Moss Road (east of Moss village). Any construction traffic travelling to the Grid Connection Corridor will travel via Askern/Moss, access to the Grid Connection Corridor will seek to utilise a haul road to the southeast of the village of Moss to avoid HGV using the junction of Trumfleet Lane/Moss Lane. **Volume I, Chapter 13 Transport and Access [APP-065]** includes a comprehensive assessment of the impact of construction traffic. Paragraph 13.7.29 onwards sets out the assessment in terms of road safety. Table 13-24 shows that the magnitude of safety impact of the Scheme would be very low and is not a significant impact. The **Framework CTMP [APP-206, APP-207]** provides details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes HGV routes which use the most appropriate routes to and from the Order limits, to limit the impact on local lanes and communities. Swept Path Analysis has been undertaken for construction routes and construction accesses. These accesses have been designed to accommodate the largest vehicles expected to use them, and local off-site highways improvements such as verge clearance and hedge cutting in relation to access locations will be made where necessary. A detailed CTMP (which must substantially accord with the **Framework CTMP [APP-206, APP-207]**) will need to be approved by City of Doncaster Council post consent prior to construction with the relevant local authorities. The detailed CTMP is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**. Pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant Local Highway Authority, as referenced in Section 5.2 of the **Framework CTMP [APP-206, APP-207]**.
RR-014, RR-033, RR-037	The noise from the 2 yr plus of construction whilst the land is prepared for the instillation of the HUGE numbers of panels with piling etc will carry around the area for 6 days a week , 10 hours aday. We are a quiet country village and noise travels more disturbing the tranquille life style, disturbing rest, sleep and disturbing use of outdoor areas during the summer months. Residents of Fenwick chose to live in Fenwick because of what the village is, and how we live and enjoy our lives, but this proposal will change everyones LIFESTYLE, and retirement ,with no discussion, no imput and totally changing everyones lives without any say which will be taken into account, of how we live our lives.	An assessment of construction noise effects during construction of the Solar PV Site is provided in **Volume I, Chapter 11: Noise and Vibration [APP-063]**. Construction of the Solar PV Site will require an estimated 24 months covering an area of approximately 407 hectares (ha) so construction works would not occur at any one location for extended periods of time. Table 11-10 of **Volume I, Chapter 11: Noise and Vibration [APP-063]** presents worst-case levels of construction noise when activities are taking place in close proximity to sensitive receptors. No adverse construction noise effects are identified so although construction noise may result in temporary effect on the acoustic character of the area, no changes to quality of life are expected. The core working hours are defined in the **Framework CEMP [APP-196]**. Noise generating activities near residential properties, such as use of power tools or piling, would be limited to the hours between 08:00 and 18:00 from Monday to Friday and between 08:00 and 13:00 on Saturday. A construction noise monitoring scheme shall be developed and agreed with the relevant local authorities following appointment of a Contractor and prior to commencement of construction works. A detailed CEMP, which must be substantially in accordance with the Framework CEMP, will need to be

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		approved prior to construction by the relevant local planning authority and is secured through Requirement 11 of Schedule 2 to the **Draft DCO [APP-220]**.
RR-014, RR-033, RR-037	Mental health issues - since this proposal as been made public, the unknown issues we will be dealing with over the next 2 years and well beyond, if the proposal is accepted have caused many endless night sleep, concerns and worries over how residents lives will change and how we will manage them, health issues from the BESS proposal being so close as theres little evidence that these things are safe to be living so close to. This proposal if accepted, will change our agricultural village into a industrial site, a small cluster of homes surrounded by metal and black glass instead of green countryside.	The Applicant recognises that the potential for future environmental changes associated with the Scheme during construction, operation and decommissioning is a source of worry and concern for local residents. The Applicant has undertaken a comprehensive and robust environmental impact assessment so that any likely significant effects of the Scheme can be identified and mitigated as far as possible, in consultation with local stakeholders, including local residents through the public consultation processes. Detailed work has been undertaken relating to potential effects including **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]**, **Volume I, Chapter 11: Noise and Vibration [APP-063]** and **Volume I, Chapter 13: Transport and Access [APP-065]** amongst other topics so that the potential for impacts is clearly set out. The Applicant is committed to ongoing consultation with the community so that anxieties can be communicated and as far as possible addressed throughout all stages of the Scheme. The **Framework BSMP [APP-205]** extensively documents how the probability of a BESS Container failure incident is minimised by the design and proposed operating procedures, and that if a failure occurs these ensure this will be limited to one BESS Container. The **Framework BSMP [APP-205]** sets out the controls in place to ensure that, in the unlikely event a fire did occur, any impacts arising from the fire (such as fumes, or water run off) will be managed so there are no impacts on local communities beyond the Order limits. The **Draft DCO [APP-220]** includes Requirement 5 in Schedule 2 which secures the Battery Safety Management Plan ('BSMP'). The detailed BSMP is to be approved by City of Doncaster Council and South Yorkshire Fire and Rescue Service. The detailed BSMP must be in accordance with the **Framework BSMP [APP-205]** which has been prepared for the application**.** The Landscape and Visual Impact Assessment in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** of the Environmental Statement recognises that there will be landscape and visual impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme. Whilst some impacts will remain at year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting. Where the potential for adverse visual effects has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A showing the planned planting for the Solar PV Site.
RR-014, RR-033, RR-037	Security - we have a large (Redacted) in and around the area, we already suffer from criminal activities as any countryside village does, with thefts and home breakins, this project will bring more attention from these people to our area and we are concerned that more home invasions, thefts and damage will occur to our properties. Theres also a concern over the quality of workers on this project and the potential criminal activity this could bring to the village.	As described in **Volume I, Chapter 2: The Scheme [APP-054]**, the Scheme incorporates fencing and various security measures, such as CCTV with 24-hour response personnel, which will mitigate against the risk of criminal activity. The perimeter of the Solar PV Site would be secured with a stock proof mesh-type security fence with wooden posts. Palisade fencing would be used around the BESS Area and On-Site Substation which would provide an added layer of security. These measures are considered to be appropriate for a scheme of this nature, similar to other consented solar schemes, and are in line with what will be required by the Scheme's insurers.

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RR-014, RR-033, RR-037	The village have an abundance of wildlife from water fowl, jays, badgers, foxes, deer, swans and large flocks of geese moving around the area, several different breeds of owls, buzzards and once they have been forced out of the area, will NOT return, and many flocks of geese and swans flying over the huge expanse of reflecting glass will die trying to land on the glass thinking its water and unable to take off again from the glass.	**Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which identifies the habitats and species present and considers if they are likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by detailed ecological surveys and a design team with qualified professional ecologists. This includes avoidance and retention of habitats of greater value for biodiversity, such as hedgerows and woodlands, buffers to protect existing features, and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. In addition, the Scheme will create and enhance a wide range of habitats, such as grasslands, hedgerows and trees, that will benefit wildlife present in the area. Details of habitat creation and enhancements are set out in the **Framework LEMP [APP-202]** The erection of solar panels will not result in any bird collisions. Wild geese and swans are migratory species that fly vast distances between breeding and wintering grounds, passing over many man-made structures on their routes. There is no evidence from the UK (or Europe) that collisions will occur.
RR-014, RR-033, RR-037	7.There seems to insufficient number of reports that have been gathered by boom to back up their reasons for using countryside land, 3 independent reports from companies employed by independent organisations, Not government or companies with proposals to build the solar farms, to be able to get an average of 3 and not one that just backs up both government and companies that employ them. With any report written on the positive side, there will be another on the negative side, therefore 3 should give a more realistic result.	The Solar PV Site has been chosen through a thorough site selection process which is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement and assessed against relevant planning policy in the **Planning Statement [APP-246]**. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable. The assessments have been undertaken by a team of specialists with relevant qualifications and experience in their respective fields. An independent and impartial Examining Authority has been appointed by the Planning Inspectorate to gather evidence and test information during the Examination of the application. During examination, as during the statutory consultation, government and non-government organisations, like the Environment Agency will have the opportunity to comment on the submitted application documents. The decision whether or not to grant development consent will be made by or on behalf of the relevant Secretary of State, after receiving the recommendation from the Examining Authority.
RR-014, RR-033, RR-037	There is obviously a concern over fire issues with the BESS, fire and emissions. As the batteries used are Lithium ones and the damage small battery fires have caused as seen already, with a HUGE number of these batterie makes for a very serious situation.	The **Framework BSMP [APP-205]** extensively documents how the probability of a BESS Container failure incident is minimised by the design and proposed operating procedures, and that if a failure occurs these ensure this will be limited to one BESS Container. The **Framework BSMP [APP-205]** sets out the controls in place to ensure that, in the unlikely event a fire did occur, any impacts arising from the fire (such as fumes, or water run off) will be managed so there are no impacts on local communities beyond the Order limits. The **Draft DCO [APP-220]** includes a requirement (Requirement 5 of Schedule 2) for the submission and approval of a detailed Battery Safety Management Plan. This will need to be substantially in accordance with the **Framework BSMP [APP-205]** and will ensure the implementation of the proposed control measures to manage battery safety.
RR-014, RR-033, RR-037	There is concern regarding the impact of the Scheme in the event of severe weather conditions, such as the recent named storms that have hit the area. This includes damage to panels, metal and glass being broken and spread around the area on high winds, into private property, injuring and killing grazing livestock still in the area, along with leaving broken glass	The Scheme has been designed to withstand the weather experienced in the UK. As detailed in Section 2.2 of the **Framework Operational Management Plan [APP-197]**, it is anticipated that regular maintenance and servicing would take place during the operation and maintenance phase, including the inspection, removal, reconstruction, refurbishment or

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	in hedgerows, grass verges and grass fields, where many residents walk their dogs and for the local horse riders.	replacement of faulty or broken equipment. This will ensure the continued safe and effective operation and maintenance of the Scheme. An assessment of Major Accidents and Disasters, which includes extreme weather events, is set out in **Volume I, Chapter 14: Other Environmental Topics [APP-066]**. The chapter concludes that there is the potential for significant effects if an event does occur, however, the risk of such events occurring is low for the Scheme and significant effects on the environment are therefore not anticipated.
RR-014, RR-033, RR-037	There remains a concern over the sale ability and house prices during and after completion of any proposal. As these panels only have a 10 yr life span, the village would go through something similar every 10 yrs when the panels need replacing.	Impacts on property prices are not a material consideration in the NSIP planning process and therefore are not a factor to be considered by the Secretary of State when determining the application for development consent. The Applicant will comply with the Compensation Code in respect of any compulsory acquisition associated with the Scheme, including any injurious affection or depreciation of land value in accordance with the relevant statutory tests. The design life of the key components of the Scheme, including the Solar PV Panels, are set out in Table 2-3 of **Volume I, Chapter 2: The Scheme [APP-054]**. This outlines how many times these components may need to be replaced, during the operational lifetime of the Scheme. This commits that there will be no wholesale replacement of Solar PV Panels, although replacement of any individual faulty or damaged individual Solar PV Panels will occur as part of normal maintenance of the Scheme.
RR-014, RR-033, RR-037	There seems to be a HUGE rush to get these plans in place all over the country with little thought or evidence to the long term effects they will have on residents and no evidence that costs for the public will be reduced, as always, these suggested costs at the beginning of these plans, are always way under estimated and will treble or more before the projects even get started, as we saw in the HS2 debarcale, again, ruining lives for many people, having to move out of much loved homes, when in the end, they didn't need too.	The **Funding Statement [APP-199]** provides details on how the Scheme is and will continue to be funded. The Applicant has appointed a number of professional advisors in connection with the development of the Scheme, including solicitors, project managers and technical consultants, all of whom have extensive experience of working within projects similar to the Scheme. Having taken and assessed the advice of these professional advisors the Applicant is confident that the Scheme is commercially viable and will be funded, if development consent is granted. The Applicant would highlight that it carried out three rounds of consultation during the pre-application period ahead of finalising its proposals for the Scheme. The Applicant has considered the inputs received from the community during these consultation processes when developing the Scheme. Full details on the consultation process are set out within the **Consultation Report [APP-022]**. An Environmental Impact Assessment has been undertaken (ES Volume 1 Chapters 1 to 16) which sets out the assessment of Environmental Effects.
RR-014, RR-033, RR-037	As a community or the parish council, have not been contacted by DMBC to discuss these plans and have gone ahead without any options gathered from the people this proposal would effect greatly during the last 2 yrs of discussion they have held. The village back in 2006/7 had a village plan completed by several residents of Fenwick where it was clear no such industrialisation to be made within the Village and to remain as a agricultural village, ironically, several of this committee, are now, stakeholders looking to do exactly the opposite on the back of huge amounts of money going into their pockets, which will bring no benefit to Fenwick at all but running residents lives for the POUND in their pockets.	The Applicant notes this comment and would highlight that it carried out three rounds of consultation during the pre-application period ahead of finalising its proposals for the Scheme. The Applicant also encouraged contact with the project team during the statutory and targeted consultations via email, freephone and Freepost to answer any queries or questions which were not answered at consultation events or covered within the consultation material. The Applicant has considered the inputs received from the community during these consultation processes when developing the Scheme. Full details on the consultation process are set out within the **Consultation Report [APP-022]**.
RR-017	We are not against the use of solar but we strongly disagree with this type of approach where schemes are developer led with a primary objective to make profits in areas where no other type of development would be allowed.	The Government has identified through its energy policy, most recently in the EN-1 and the NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation,

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	In brief we have some major concerns about the location and in size of the proposed solar plant, battery storage, substation and related infrastructure, which has a land uptake of almost 70 % of the Fenwick parish.	such as the Scheme, as being required to meet this need. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme. The Solar PV Site has been chosen through a thorough site selection process which is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement and assessed against relevant planning policy in the **Planning Statement [APP-246]**. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and wide-ranging stakeholder engagement. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable. As set out in the **Design and Access Statement [APP-191]**, design principles have guided, and will continue to guide, the Scheme from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures.
RR-017	The huge impact it will have on the environment , wildlife, the local community and the wider population whilst in construction and for the public who live there and use the public access areas such as footpaths and bridleways for the next at least 40 years.	As set out in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]**, **Volume I, Chapter 11: Noise and Vibration [APP-063]** and **Volume I, Chapter 13: Transport and Access [APP-066]** of the Environmental Statement, measures to minimise community disturbance from impacts such as noise, traffic and visual amenity as a result of the Scheme are provided in the **Framework CEMP [APP-196],** the **Framework CTMP [APP-206, APP-207]**, and the **Framework OEMP [APP-197]**. Detailed management plans will need to be approved post consent, and prior to construction, by City of Doncaster Council. These detailed management plans must substantially accord with the framework management plans, meaning the Applicant must implement mitigation which has been promised, and are secured by Requirements 11 to 13 in Schedule 2 to the **Draft DCO [APP-220]**. A Community Liaison Group will be also set up and is secured by Requirement 3 in Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Officer (or alternative role) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the impacts of the Scheme. The implementation of Requirement 3 will allow feedback on impacts of the Scheme and mitigation measures to be considered and acted upon if required. **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**.
RR-017	A proposal of the size and scale has never been part of the community or local plan, this is not just a few solar panels this is a power plant with storage and sub station to facilitate not only the scheme but allow whichever company may own it to use the battery storage as a	While it is acknowledged that a solar development may not have been identified for the area as part of earlier community plans, the Solar PV Site has been chosen through a thorough site selection process which is explained more fully in **Volume I, Chapter 3: Alternatives**

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	means to buy and sell electricity for profit and not purely for the storage of energy produced by the solar panels.	**and Design Evolution [APP-055]** of the Environmental Statement and assessed against relevant planning policy in the **Planning Statement [APP-246]**. The Government has identified through its energy policy, most recently in the NPS EN-1 and the NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. The BESS Area has a direct relationship with the Solar PV Site and will support its operation by storing electricity produced during times of peak capacity until it needs to be released. This increases the efficiency of the Solar PV Site as a renewable energy project aiding both its operation as a generating station and the export of electricity to the National Electricity Transmission System. The need to have flexibility and integrated technologies, such as BESS, is recognised by the Overarching National Policy Statement for Energy (Paragraphs 3.3.5 and 3.3.6). In addition, Paragraph 2.10.10 of the National Policy Statement for Renewable Energy provides policy support for schemes that include co-located solar and storage technologies because both technologies are needed and co-location maximises the efficiency of land use. In addition, the BESS system will have the ability to import energy from the grid at times of excess generation, discharging the stored energy at times of peak demand and assisting in balancing UK's electricity supplies. Including BESS as part of Solar PV Schemes is a well-recognised design approach, applied on several solar developments proposed around the UK. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme.
RR-017	The need for additional battery storage linked to Thorpe Marsh (the point the proposal will join the grid) should also be questioned as there is a proposal for battery storage at Thorpe marsh. The Thorpe Marsh battery storage project could store up to 2.9GWhrs of energy, enough to supply around 340,000 households with electricity for one day which put into context can supply more than around 200,000 more homes than in the whole of Doncaster borough	The BESS Area has a direct relationship with the Solar PV Site and will support its operation by storing electricity produced during times of peak capacity until it needs to be released. This increases the efficiency of the Solar PV Site as a renewable energy project aiding both its operation as a generating station and the export of electricity to the National Electricity Transmission System. The need to have flexibility and integrated technologies, such as BESS, is recognised by the Overarching National Policy Statement for Energy (Paragraphs 3.3.5 and 3.3.6). In addition, Paragraph 2.10.10 of the National Policy Statement for Renewable Energy provides policy support for schemes that include co-located solar and storage technologies because both technologies are needed and co-location maximises the efficiency of land use. In addition, the BESS system will provide the ability to import energy from the national grid at times of excess electricity generation, discharging the stored energy at times of peak demand and assisting in balancing the UK's electricity supplies. The BESS Area component of both the Scheme and the battery storage facility identified for Thorpe Marsh are part of the response to the need to store renewable power generated during periods of oversupply of renewable electricity, which is then released when there is insufficient supply of renewable generation (such as when there is less sunshine). Therefore, the projects are complementary in that they will help ensure reliable and stable electricity grid operation at times of peak demand, thus helping to improve the UK's energy security over the long term. The **Statement of Need [APP-192]** discusses in more detail the need and benefits for the Battery Energy Storage System as part of the Scheme.

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RR-017	The industrialisation of the countryside under the guise of a solar farm is surely not the right approach for energy security in the UK. We also don't believe that proposals of this scale should be decided prior to NESO report has been produced and a national strategy for storage and generation is in place.	The Government has identified through its energy policy, most recently in the NPS EN-1 and the NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme. The Applicant is in regular discussion with National Grid. **Volume I Chapter 10: Landscape and Visual Amenity [APP-062]** presents an assessment of the Scheme's impact on the existing landscape character and its potential visual effects. As described in **Volume I Chapter 10: Landscape and Visual Amenity [APP-062]**, an extensive range of mitigation and enhancement measures are proposed as part of the Scheme which reduce the landscape and visual effects of the Scheme as far as practicable. The chapter concludes that some significant adverse residual effects on landscape character and visual amenity would remain by Year 15 of the operation and maintenance phase of the Scheme. However, these operational effects are localised and would be reversed following 40 years of operation through decommissioning. It is therefore not considered that the Scheme would result in the industrialisation of the countryside.
RR-020	I moved here for my health and wellbeing to be able to enjoy the countryside in a rural setting. The effects of the solar farm will remove all the reasons we have decided to buy our forever home here. We moved here for our (Redacted) home & we have a great like minded community & the solar farm has divided our community & threatened our life here in the uk where we we were once proud to call home.	The Applicant recognises that the potential environmental effects of the scheme are a source of concern for local residents, and has where practicable incorporated design and mitigation measures to minimise these potential adverse effects on their mental and physical health. Chapters of the Environmental Statement have presented effects of the Scheme which have the potential to impact on both physical and mental health, but none have identified likely significant adverse effects during the various phases of the Scheme with respect to the impacts on health. Impacts will be managed to acceptable levels through the suite of management plans proposed and secured via the requirements in Schedule 2 of the **Draft DCO [APP-220]**. The Applicant is committed to ongoing consultation with the community so that anxieties can be communicated and as far as possible addressed throughout all stages of the Scheme. A Community Liaison Group will be also set up and is secured by Requirement 3 in Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Officer (or alternative role) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the impacts of the Scheme. The implementation of Requirement 3 will allow feedback on impacts of the Scheme and mitigation measures to be considered and acted upon if required.
RR-021	I am writing to express my major concerns regarding the proposed solar plant, battery storage, substation, and associated infrastructure that would occupy nearly 70% of Fenwick parish. This proposal raises several issues that merit thorough consideration: Environmental Impact: The scale of the project poses a significant risk to the local environment and wildlife. An area of this size will undoubtedly disrupt local ecosystems and habitats.	An Environmental Impact Assessment has been undertaken (ES Volume 1 Chapters 1 to 16) which sets out the assessment of Environmental Effects. **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes

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		avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. As detailed in the **BNG Assessment [APP-200]**, the Scheme is predicted to exceed the BNG target of 10% and this is predicted for each habitat type. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types as secured by the **Framework LEMP [APP-202]** and Requirement 6 in Schedule 2 in the **Draft DCO [APP-220].**
RR-021	Community Disruption: The inherent changes to the landscape and potential construction disturbances will affect the local community profoundly. Residents who utilize public access areas, including footpaths and bridleways, will experience altered living conditions for at least 40 years. This project could lead to increased traffic, noise, and reduced quality of life for those living in proximity. Lack of Community Integration: This proposal is notable not just for its size but also for its departure from established community and local planning frameworks. The infrastructure outlined is more akin to a power generation facility than a modest solar installation, suggesting broader implications for the area's development and character. Profit Motive of Businesses: The establishment of a battery storage facility poses the risk that it may be used as a profit-driven enterprise. The potential for energy trading could divert focus from local energy needs and priorities toward corporate profit, undermining community interests.	The Solar PV Site has been chosen through a thorough site selection process which is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** and assessed against relevant planning policy in the **Planning Statement [APP-246]**. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and wide-ranging stakeholder engagement. As set out in the **Design and Access Statement [APP-191]**, design principles have guided, and will continue to guide, the Scheme from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures. The BESS Area has a direct relationship with the Solar PV Site and will support its operation by storing electricity produced during times of peak capacity until it needs to be released. This increases the efficiency of the Solar PV Site as a renewable energy project aiding both its operation as a generating station and the export of electricity to the National Electricity Transmission System. The need to have flexibility and integrated technologies, such as BESS, is recognised by the Overarching National Policy Statement for Energy (Paragraphs 3.3.5 and 3.3.6). In addition, Paragraph 2.10.10 of the National Policy Statement for Renewable Energy provides policy support for schemes that include co-located solar and storage technologies because both technologies are needed and co-location maximises the efficiency of land use. In addition, the BESS system will provide the ability to import energy from the national grid at times of excess electricity generation, discharging the stored energy at times of peak demand and assisting in balancing the UK's electricity supplies. Landscape and visual impacts on users of footpaths and bridleways have been summarised in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** of the Environmental Statement and assessed in more detail in **Volume III, Appendix 10-6: Visual Assessment [APP-166]**. A number of mitigation measures have been embedded within the design of the Scheme to reduce the impact on users of footpaths and bridleways. These include a minimum distance of 20 m from perimeter fencing to the centre of footpaths where solar infrastructure lies on both sides of a footpath, creating at least a 40 m corridor between fencelines. This reduces to 15 m where solar infrastructure is on one side of the footpath and extends to 30 m from the BESS Area. A further 5 m buffer would be provided between the perimeter fencing and the Solar PV Panels. Offsets will include areas of open grassland and in some instances new structural vegetation. These offsets have been secured through the **Works Plans [APP-214]** and more information can be found in **Framework PRoWMP [APP-202]**. As set out in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]**, **Volume I, Chapter 11: Noise and Vibration [APP-063]** and **Volume I, Chapter 13: Transport and Access [APP-066]** of the Environmental Statement, measures to minimise community

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		disturbance from impacts such as noise, traffic and visual amenity as a result of the Scheme are provided in the **Framework CEMP [APP-196],** the **Framework CTMP [APP-206, APP-207]**, and the **Framework OEMP [APP-197]**. Detailed management plans will need to be approved post consent, and prior to construction, by City of Doncaster Council. These detailed management plans must substantially accord with the framework management plans, meaning the Applicant must implement mitigation which has been promised, and are secured by Requirements 11 to 13 in Schedule 2 to the **Draft DCO [APP-220]**. A Community Liaison Group will be also set up and is secured by Requirement 3 in Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Officer (or alternative role) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the impacts of the Scheme. The implementation of Requirement 3 will allow feedback on impacts of the Scheme and mitigation measures to be considered and acted upon if required.
RR-021	Questionable Need for Additional battery Storage: The need for supplementary battery storage connectivity to Thorpe Marsh should be scrutinized, especially considering the existing proposal for a significant battery storage project at that location. The combined capacity from these efforts raises questions about the necessity of this new development, particularly with the potential to store sufficient energy for over 340,000 households for an entire day. Delay Pending National Strategy: Crucially, I believe that such large-scale proposals should not proceed until the National Energy Infrastructure Strategy (NESO) report is published. A clear national strategy for energy storage, connectivity and generation should inform local projects to ensure they align with broader energy needs and goals. In light of these concerns, I urge the relevant authorities to consider the implications of this project and prioritize an approach that fully assesses its environmental, social, and economic impact on our community.	The battery energy storage component of both the Scheme and the battery storage facility identified for Thorpe Marsh will provide peak generation and grid balancing services to the national grid. Both are part of the response to the need to store renewable power generated during periods of oversupply of renewable electricity, which is then released when there is insufficient supply of renewable generation (such as when there is less sunshine). Therefore, the projects are complementary in that they will help ensure reliable and stable electricity grid operation at times of peak demand, thus helping to improve the UK's energy security over the long term. The need to have flexibility and integrated technologies, such as BESS, is recognised by the Overarching National Policy Statement for Energy (Paragraphs 3.3.5 and 3.3.6). In addition, Paragraph 2.10.10 of the National Policy Statement for Renewable Energy provides policy support for schemes that include co-located solar and storage technologies because both technologies are needed and co-location maximises the efficiency of land use. Further information regarding the need for the Scheme can be found the **Statement of Need [APP-192].** discusses the need for the Battery Energy Storage System as part of the Scheme. The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy and the National Policy Statement for Renewable Energy, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme.
RR-022	Loss of habitat for native creatures such as deers, newts, barn owls,red kites plus many more. Noise and transport issues during and after build such as safety of children, road users , walkers and cyclists who use the access the area daily. Collapse of village life through loss of farming land for future generations and community relations. Solar panels not sustainable for the future. Land will be left derelict and a rural black spot. Highways	<u>Damage to habitats</u> **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes

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		avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. As detailed in the **BNG Assessment [APP-200]**, the Scheme is predicted to exceed the BNG target of 10% and this is predicted for each habitat type. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types as secured by the **Framework LEMP [APP-202]** and requirement 6 in Schedule 2 in the **Draft DCO [APP-220].** Noise Impacts An assessment of noise impacts from equipment, such as transformers and inverters, on residential receptors is presented in **Volume I, Chapter 11: Noise and Vibration [APP-063]**. With proposed mitigation measures in place, noise from equipment is not considered to be significant and is likely to be less than ambient noise levels. Working hours are set out in the **Framework CEMP [APP-196]** with the use of high noise generating plant limited to the hours between 08:00 and 18:00 from Monday to Friday and between 08:00 and 13:00 on Saturday. There will be no works undertaken on Sundays or Bank Holidays unless crucial to construction (for example HDD which must be a continuous activity) or in an emergency. The BESS Area and On-Site Substation do emit some noise when operating and these have therefore been carefully located with respect to residential receptors. Operational noise impacts are assessed in **Volume I, Chapter 11: Noise and Vibration [APP-063]** which concludes that operational impacts will be negligible at all residential receptors. Traffic and Highways Impacts A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within **Volume I, Chapter 13: Transport and Access [APP-065]** of the Environmental Statement. Traffic during the operation and maintenance phase would be minimal. The **Transport Assessment [APP-179]** and **Framework CTMP [APP-206, APP-207]** provide full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes measures such as suitable agreed Heavy Good Vehicle routes and timing restrictions, the use of traffic marshals at site accesses and crossing points, and the development of a communications strategy for those working on the Scheme. A detailed Construction Traffic Management Plan (which must substantially accord with the Framework CTMP) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**. The Applicant has selected access locations for construction vehicles to minimise any interactions with PRoW and will ensure that robust procedures are put in place to ensure the safety of PRoW users and these are set out in the **Framework PRoWMP [APP-202]** and **Framework CTMP [APP-206, APP-207]**. Detailed management plans will need to be approved post consent, and prior to construction, by City of Doncaster Council. These detailed management plans must substantially accord with the framework management plans, meaning the Applicant must implement mitigation which has been promised, and are secured by Requirements 11 to 13 and Requirement 17 in Schedule 2 to the **Draft DCO [APP-220]**. The Applicant will maintain PRoW connectivity during the construction of the Solar PV Site and Grid Connection Corridor. Any PRoW to be temporarily closed will have a suitable localised diversion in place to allow continued use by the local community, as set out in the

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		Framework PRoWMP [APP-202]. A detailed management plan must substantially accord with the framework management plan, meaning the Applicant must implement mitigation which has been promised, and are secured by Requirements 17 in Schedule 2 to the **Draft DCO [APP-220]**. The majority of construction staff and HGV vehicle movements are expected to occur outside of the traditional school arrival and departure times through Askern (e.g. 08:00-09:00 and 15:00-16:00). For example, staff movements are expected between 06:00-07:00 in the AM and between 19:00-20:00 in the PM. HGVs are expected to move between 09:00-17:00, therefore it is possible that some movements could occur along Moss Road in Askern during the PM school pick up period. During the 15:00-16:00 period a total of 4 two-way HGVs are expected through Askern. These movements would be managed through the detailed CTMP. <u>Loss of farming land</u> In identifying areas that could be suitable for a Solar PV Site the Applicant considered locations that would avoid BMV agricultural land. The results of this exercise are set out in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement. As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** of the Environmental Statement, an agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV land. With the exception of a relatively small area of BMV land which will be used for landscaping, impacts on any BMV land in the Scheme will be reversible. It is also noted that the existing BMV land is not currently farmed for high-quality agricultural food production and was recently used for biomass crops. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**. Prior to the start of construction, a detailed Soil Management Plan will be submitted to and approved by the local authority (as outlined in the **Framework CEMP [APP-196]** and secured by Requirement 15 of Schedule 2 to the **Draft DCO [APP-220]**). This will ensure soils are not degraded and farming activities can re-commence following completion of the construction phase along the Grid Connection Corridor and decommissioning phase within the Solar PV Site. <u>Solar panels are not sustainable</u> As explained in the **Statement of Need [APP-192]** solar power generation has global momentum, and various large-scale schemes are being developed in the UK. Solar is a proven technology. It is already delivering as part of the UK's electricity system and will continue to deliver further critical benefits to consumers through the urgent and continued decarbonisation, security of supply and affordability. Solar power generation has undergone significant technological advances in scale and commercial efficiency and solar panel efficiency is expected to continue improving over the course of the 2020s. A detailed design process will need to follow if the DCO is granted to ensure the Scheme can make best use of the latest technology and construction methods which, in turn, will contribute towards meeting the UK's legal carbon emission reduction obligations.

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		Land will be left derelict The operational life of the Scheme is 40 years, with decommissioning to commence 40 years after final commissioning (currently anticipated to be approximately 2030 to 2070). This is set out in the **Framework DEMP [APP-198]** which will be secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-220]**. At the end of the 40 years, the Solar PV Site will be decommissioned and the land fully reinstated as near as practicably possible to its former condition and land use. Some areas of habitat and biodiversity mitigation and enhancement may be left for species protection. Further details of the plans for decommissioning are set out in the **Framework DEMP [APP-198]**. The Applicant will be legally obliged to carry out the decommissioning in accordance with the Framework Decommissioning Environmental Management Plan as submitted with this application, and it if failed to do so would be open to enforcement action by local planning authorities.
RR-023	I am extremely concerned about the impact the solar farm will have on Fenwick, a small, semi-rural village. The size of the proposed solar farm is vast and I feel it will totally and detrimentally change the character of the village during my lifetime.	The Landscape and Visual Impact Assessment in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** recognises that there will be landscape and visual impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme. Whilst some impacts will remain at year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting. Where the potential for adverse visual impacts has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these impacts as far as possible. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed screening and buffers including existing vegetation to be retained and proposed planting are provided in the **Framework LEMP [APP-203]** and illustrated on the Indicative Landscape Masterplan included as Appendix A of that document. Existing hedgerows will be retained as far as practicable. Buffers of grassland, native scrub and woodland will be created around the edge of the Solar PV Site and other larger areas of grassland will be created, which will offer habitat for wildlife, including foraging habitat for a number of species. These buffers minimise the potential for adverse impacts
RR-023	I am extremely concerned about the impact on health and mental wellbeing due to the increased traffic and noise disruption whilst construction of the solar farm takes place. One of the main reasons I chose to live in Fenwick, which I have for nearly (Redacted) years, is because I want to live in an area away from these disturbances.	The Applicant recognises that the potential environmental effects of the scheme are a source of concern for local residents, and has where practicable incorporated design and mitigation measures to minimise these potential adverse effects on their mental and physical health. Chapters of the Environmental Statement have considered potential effects of the Scheme which have the potential to impact on both physical and mental health, and concluded none of these are likely to have significant adverse effects on the health of local communities during the various phases of the Scheme. Impacts will be managed to acceptable levels through the suite of management plans proposed and secured via the requirements in Schedule 2 of the **Draft DCO [APP-220]**. The Applicant is committed to ongoing consultation with the community so that anxieties can be communicated and as far as possible addressed throughout all stages of the Scheme. A Community Liaison Group will be set up and is secured by Requirement 3 in Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Officer (or alternative role) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the impacts of the Scheme. The implementation of Requirement 3 will allow feedback on impacts of the Scheme and mitigation measures to be considered and acted upon if required.

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RR-025	• Solar farms are hugely inefficient. • Clustering of development around sub-stations has disastrous consequences for the landscape and local amenity. The cumulative effect intensifies the harm caused. • Solar panels dramatically alter views of the countryside and the key features that punctuate it. • Best and Most Versatile (BMV) land (Grade 1, 2 & 3a) should not be used for industrial purposes. • Sequential testing is essential for any proposal involving greenfield land. • Solar Farms are not environmentally friendly. • The amenity of neighbouring property can be seriously harmed by secured boundaries and intrusive CCTV. • It is highly unlikely that the land could return to agriculture in 40 years time. • How recyclable are the panels? • Reinstatement bonds are worthless. • There are better alternatives.	Efficiency of Solar As explained in the **Statement of Need [APP-192]** solar power generation has global momentum, and various large-scale schemes are being developed in the UK. Solar is a proven technology. It is already delivering as part of the UK's electricity system and will continue to deliver further critical benefits to consumers through the urgent and continued decarbonisation, security of supply and affordability. Solar power generation has undergone significant technological advances in scale and commercial efficiency and solar panel efficiency is expected to continue improving over the course of the 2020s. A detailed design process will need to follow if the DCO is granted to ensure the Scheme can make best use of the latest technology and construction methods. The Scheme design retains flexibility to allow for the selection of the most efficient technology close to the point of the construction of the Scheme. The final technology installed will be required to remain within the parameters defined by the **Works Plan [APP-214]** and **Outline Design Parameters Statement [APP-193]**. Landscape and Visual Impacts The Landscape and Visual Impact Assessment in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** recognises that there will be some landscape and visual impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme. Whilst some impacts will remain at year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting. Where the potential for adverse visual effects has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A. Loss of BMV Land and return to agriculture In identifying areas that could be suitable for a Solar PV Site the Applicant considered locations that would avoid BMV agricultural land. The results of this exercise are set out in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement. As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** of the Environmental Statement, an agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV land. With the exception of a relatively small area of BMV land which will be used for landscaping, impacts on any BMV land in the Scheme will be reversible. It is also noted that the existing BMV land is not currently farmed for high-quality agricultural food production and was recently used for biomass crops. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**. Site Selection

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		The Solar PV Site has been chosen through a thorough site selection process which is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement and assessed against relevant planning policy in the **Planning Statement [APP-246]**. All comments received from stakeholders and the local community regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable. Security As discussed in **Volume I, Chapter 2: The Scheme [APP-054]** the Scheme is not proposing any visible lighting from CCTV or artificial lighting for security purposes during operation. The CCTV will use thermal imaging and Infrared lighting to provide night vision functionality. This is secured in the **Outline Design Parameters Statement [APP-193]**. The CCTV cameras will have fixed, inward-facing viewsheds and will be aligned to capture only the perimeter fence and the area inside the fence, which will not capture publicly accessible areas or any residential curtilages and thereby not resulting in a loss of privacy for any nearby residential occupiers. Recycling of the solar panels As detailed above, a detailed design process will need to follow if the DCO is granted to ensure the Scheme can make best use of the latest technology and construction methods. Determining the solar panel provider will be one of the last decisions to be made when looking to place orders to deliver the Scheme. However, it is expected that the majority of the panel components will be recyclable and materials can be recovered and reused. Reinstatement Bonds The operational life of the Scheme is 40 years, with decommissioning to commence 40 years after final commissioning (currently anticipated to be approximately 2030 to 2070). The Applicant is not offering reinstatement bonds. Instead there are specific measures and controls set out in the **Framework DEMP [APP-198]** which will be secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-220]**. At the end of the 40 years, the Solar PV Site will be decommissioned and the land fully reinstated as near as practicably possible to its former condition and land use. Some areas of habitat and biodiversity mitigation and enhancement may be left for species protection. Further details are set out in the **Framework DEMP [APP-198]**. The Applicant will be legally obliged to carry out the decommissioning in accordance with the Framework Decommissioning Environmental Management Plan as submitted with this application, and it if failed to do so would be open to enforcement action by local planning authorities. Alternatives The Government has identified through its energy policy, most recently in NPS EN-1 and NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. The **Statement of Need [APP-192]** also notes that, whilst decentralised generation has an important role to play in decarbonisation, 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. Therefore, smaller scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, the need for large-scale, ground-mounted solar like this Scheme.

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		Brownfield land was considered for the Scheme following a review of the local authority brownfield land register. However, it was concluded that there was no available or suitable brownfield land for the Scheme as it would compete or be in conflict with local planning policy seeking to deliver housing and mixed-use developments, and the land next to the Existing National Grid Thorpe Marsh Substation was being developed for another energy project. This is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]**.
RR-025	THE INEFFICIENCY OF SOLAR FARMS • By comparison with off-shore wind, solar farms are hugely inefficient. • A 140 acre solar park is said to be capable of supplying electricity to about 9,000 homes. One wind turbine in the North Sea has the capacity to power 16,000 homes. • In terms of efficiency rating i.e. the amount of power exported to the grid, solar's rating is between 11 and 15% whereas for off-shore wind the figure is 50%+. • On one day last year it has been reported that 78% of the UK's electricity came from off-shore wind.	As explained in the **Statement of Need [APP-192]** solar power generation has global momentum, and various large-scale schemes are being developed in the UK. NPS EN-1 Paragraph 3.3.4 recognises that no single type of electricity infrastructure will be able to meet any UK government objectives in isolation, so new generators of varied technology, assets that provide flexibility and new networks will all be needed. However, the previous government concluded from its analysis that "*a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar*" (NPS EN-1 Paragraph 3.3.20). Solar is a proven technology. It is already delivering as part of the UK's electricity system and will continue to deliver further critical benefits to consumers through the urgent and continued decarbonisation, security of supply and affordability. Solar power generation has undergone significant technological advances in scale and commercial efficiency and solar panel efficiency is expected to continue improving over the course of the 2020s. A detailed design process will need to follow if the DCO is granted to ensure the Scheme can make best use of the latest technology and construction methods. The Scheme design retains flexibility to allow for the selection of the most efficient technology. Solar generation technology is developing at a fast pace, with better, more efficient and more cost-effective Solar PV Panels coming to the market. The Applicant is therefore seeking to retain the flexibility to choose the precise technology close to the point of the construction of the Scheme. This will enable the optimum production of renewable energy and subsequently reduce cost for the end user. The final technology installed will be required to remain within the parameters defined by the **Works Plan [APP-214]** and **Outline Design Parameters Statement [APP-193]**.
RR-025	COALESCENCE AND CUMULATIVE EFFECT • Developers promote the cheapest solutions only and do not consider a range of feasible options. • Low Carbon's Great Wilbraham solar development (which is connected to a sub-station 11km from the site) demonstrates that there is no technological barrier to connecting sites at a range of locations. • Developer's preference for the lowest cost options leads to clustering around sub-stations (Thaxted and Stocking Pelham). • Harm to the landscape is therefore intensified. • Increased harm to the character of Public Rights of Way. • Increased impact on local wildlife.	<u>Site selection</u> The Solar PV Site has been chosen through a thorough site selection process which is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement and assessed against relevant planning policy in the **Planning Statement [APP-246]**. Proximity to an available grid connection with appropriate capacity is fundamental to the viability and deliverability of large-scale solar development. This is recognised at Paragraph 2.10.24 of National Policy Statement EN-3 which states: "…*the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial"* Following discussions with National Grid, the Applicant identified available capacity at the Existing National Grid Thorpe Marsh Substation and subsequently secured a Point of Connection (POC). The Applicant considered the compatibility of the POC and surrounding land with Solar PV and BESS technology. This mainly considered land within the City of Doncaster Council's administrative area (owing to the central location of the POC in that area). Technical considerations focussed on irradiation levels from the sun and topography which are key factors in identifying suitable locations for solar development as identified in NPS EN-3, Paragraph 2.10.19. The Applicant found that the areas surrounding the POC had good levels of irradiation and comprised of mainly flat topography. The availability of the

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		POC, together with good levels of irradiation levels and surrounding flat topography, illustrates its suitability for the delivery of critical national priority infrastructure. The site selection process that followed as set out in the remaining sections of this chapter further demonstrates the suitability of the Solar PV Site for the Scheme. Landscape and Visual Impacts The Landscape and Visual Impact Assessment in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** recognises that there will be some landscape and visual impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme. Whilst some impacts will remain at year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting. Where the potential for adverse visual effects has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A. Public Rights of Way Landscape and visual impacts on users of footpaths and bridleways have been summarised in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** of the Environmental Statement and assessed in more detail in **Volume III, Appendix 10-6: Visual Assessment [APP-166]**. A number of mitigation measures have been embedded within the design of the Scheme to reduce the impact on users of footpaths and bridleways. These include a minimum distance of 20 m from perimeter fencing to the centre of footpaths where solar infrastructure lies on both sides of a footpath, creating at least a 40 m corridor between fencelines. This reduces to 15 m where solar infrastructure is on one side of the footpath and extends to 30 m from the BESS Area. A further 5 m buffer would be provided between the perimeter fencing and the Solar PV Panels. Offsets will include areas of open grassland and in some instances new structural vegetation. These offsets have been secured through the **Works Plans [APP-214]** and more information can be found in **Framework PRoWMP [APP-202]**. Local ecology **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. As detailed in the **BNG Assessment [APP-200]**, the Scheme is predicted to exceed the BNG target of 10% and this is predicted for each habitat type. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types as secured by the **Framework LEMP [APP-202]** and Requirement 6 in Schedule 2 in the **Draft DCO [APP-220].**

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RR-025	IMPACT ON LANDSCAPE QUALITY • The countryside is industrialised by the development of large-scale solar farms. • Continuous rows of glass panels completely alter landscape character. • Boundaries are changed by security fencing and the intrusion of CCTV. • Great weight should be given to the findings and recommendations of independent Landscape Quality Assessment. • Solar farm development should not be approved where it is contrary to Local Plan Policies. • The NPPF includes an overarching objective to protect and enhance our natural, built and historic environment, including making effective use of land	Landscape and visual impacts on users of footpaths and bridleways have been summarised in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** and assessed in more detail in **Volume III, Appendix 10-6: Visual Assessment [APP-166]**. Impacts on the landscape have been reduced through the design of the Scheme by siting Solar PV Infrastructure within existing field patterns, therefore minimising vegetation loss. Other embedded mitigation which has reduced impacts on landscape include offsets from existing vegetation, offsets from sensitive receptors, the creation of new green infrastructure, and design of fencing and lighting. More detail on embedded mitigation can be found in Section 10.7 of **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]**. Whilst there will be fencing as part of the Scheme, heavy-duty security fencing will be limited to the BESS Area and On-Site Substation. Additional offsets and new mitigation planting have been proposed to minimise the visual impact of this. Elsewhere, a stock-proof mesh type fencing with wooden posts and a maximum height of 2.2 m will be used. CCTV will be inward facing and mounted on wooden posts appropriately 2.5 m high. It will use thermal and infrared imaging to avoid the need for lighting at night. More detail on fencing and other infrastructure can be found in **Outline Design Parameters Statement [APP-193]**. As recognised in NPS EN-1 Paragraph 5.10.5, the development of new energy infrastructure, at the scale and speed required to meet the current and future need identified, is likely to have some negative effects on landscape and visual amenity which may not be able to be mitigated. The Scheme has sought to minimise impacts through design iteration and careful planting, it is therefore considered that the Scheme accords with Paragraphs 5.10.6 and 5.10.37 of NPS EN-1. For the balancing of effects and benefits required by Paragraphs 5.10.14 and 5.10.35 of NPS EN-1, it is considered that the substantial benefits and need for the Scheme as set out in Section 5 of the **Planning Statement [APP-246]**, including the delivery of CNP Infrastructure to contribute towards meeting national energy objectives outweigh the localised residual landscape and visual effects, and whilst they may be long term, the residual local landscape and visual effects will also be temporary. Overall, therefore it is considered that the Scheme accords with national and local landscape and visual amenity policies.
RR-025	LOSS OF AGRICULTURAL LAND Solar Farm operators regularly promote schemes on high grade land. The use of this productive farm land is in breach of the guidance notes of their own trade Association and it flies in the face of government agricultural policy. • We need our best land to be productive. 60% of our food is imported – is this environmentally sustainable? • The amount of arable land in the UK is in decline. It currently stands at 14.8 million acres, which is the lowest since World War 2. • Land is being taken out of cultivation at a rate of almost 100,000 acres per annum. At the same time yields are declining as is land quality due to the effect of global warming. So, production potential is already diminished and we cannot afford to lose further parcels of arable land to development that has no need to be there. LAND QUALITY AND SEQUENTIAL TESTING • Development should be limited to brownfield land and poorer quality unproductive land. • BMV land should be avoided. The 'most compelling evidence' would be required if it was to be used.	**Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** explains how the Applicant has undertaken site selection and design in a proportionate way, in accordance with Paragraphs 2.10.19 to 2.10.48 of NPS EN-3. Agricultural land quality was a key consideration in the Applicant's site selection process. The Applicant considered locations that would avoid BMV agricultural land. To identify these locations the Applicant used provisional ALC mapping published by Natural England. This is identified on **Volume II, Figure 3-2: Agricultural Land Classification [APP-077]** and **Volume II, Figure 3-3: Exclusion of Best and Most Versatile agricultural land [APP-078]** and allowed the identification of areas of land that comprised of non-BMV land (Grade 4, Grade 5 and non-agricultural land) within City of Doncaster Council's administrative area. Grade 1, 2 and 3 BMV land and urban areas identified on **Volume II, Figure 3-2: Agricultural Land Classification [APP-077]** were avoided. Previously developed land was also considered. These land types were identified by checking the local authority brownfield register. No suitable or available areas of brownfield or non-agricultural land were identified. As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** of the Environmental Statement, an agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV land. Due to the small scale of this BMV land, it is not currently farmed for high-quality agricultural food production and was recently used for biomass crops.

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	• The fact that BMV land happens to be available from a farmer who wants to abandon farming is not compelling evidence. • The fact that it is difficult to find poorer quality land within the district is not compelling evidence. • Local authority boundaries are not to be used as a limiting factor in the search for alternative options. If there is no poor quality land within a district the only logical conclusion is that industrial scale solar plants are not the right renewable solution for that area. • Sequential testing is required in relation to the use of agricultural land.	With the exception of a relatively small area of BMV land proposed for planting, impacts on this BMV land will be reversible with the decommissioning of the Solar PV Panels. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**. Prior to the start of construction, a detailed Soil Management Plan will be submitted to and approved by the local authority (as outlined in the **Framework CEMP [APP-196]** and secured by Requirement 15 of Schedule 2 to the **Draft DCO [APP-220]**). This will ensure soils are not degraded and farming activities can re-commence following completion of the construction phase along the Grid Connection Corridor and decommissioning phase within the Solar PV Site.
RR-025	WILDLIFE AND BIODIVERSITY • Grazing sheep and bee-keeping are token gestures and in no way compensate for the lost potential of the land. • Transitory animals have their traditional routes blocked. Deer are often diverted onto roads. • Bird and bat deaths are common as they mistake the glass for water • The land is degraded with little potential for biodiversity as half of it will be in permanent shadow and rain water run-off creates set channels without proper dispersal. • Topsoil is removed and cleaning materials can contaminate the soil. • There is the possibility of toxic chemicals leaching out from the panels. • Lithium-ion battery storage represents a huge fire risk.	**Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which identifies the habitats and species present and considers if they are likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by detailed ecological surveys and a design team with qualified professional ecologists. This includes avoidance and retention of habitats of greater value for biodiversity, such as hedgerows and woodlands, buffers to protect existing features, and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. There will be no degradation of the land for biodiversity. As detailed in the **BNG Assessment [APP-200]**, the Scheme is predicted to exceed the BNG target of 10% and this is predicted for each habitat type. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types as secured by the **Framework LEMP [APP-202]** and requirement 6 in Schedule 2 in the **Draft DCO [APP-220]**. The Scheme will create and enhance a wide range of habitats, such as grasslands, hedgerows and trees, that will benefit wildlife present in the area. Details of habitat creation and enhancements are set out in the **Framework LEMP [APP-202]**. This includes areas of grassland both within and outside of areas containing solar panels. The type and condition of these grasslands is explained in the **Framework LEMP [APP-202].** Sheep-grazing is a mechanism for managing the created grasslands in a way that maximises their biodiversity value. The erection of the Solar PV Panels will not result in any bird or bat collisions. Wild geese and swans are migratory species that fly vast distances between breeding and wintering grounds, passing over many man-made structures on their routes. Equally, bats are expert at navigating complex environments and there is no reason to suggest they would collide with static structures, such as the Solar PV Panels. There is no evidence from the UK (or Europe) that collisions will occur.

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		The **Framework SMP [APP-199]** relates to the agricultural soils within the Order limits. These soils are considered clean, naturally occurring materials and there is no intention to discard these agricultural soils off-site. As secured in the **Framework OEMP [APP-197]**, a detailed OEMP will be prepared and include a regular schedule for visual inspection of the Solar PV Panels and all other equipment. It is anticipated the inspection, removal, reconstruction, refurbishment or replacement of faulty or broken equipment would be undertaken. Therefore, it is considered that the Solar PV Panels do not present an unacceptable risk to ground conditions. The **Framework BSMP [APP-205]** outlines the key fire safety provisions for the BESS Area proposed to be installed as part of the Scheme, including measures to reduce fire risk and fire protection measures in the unlikely event of a fire occurring.
RR-025	RESIDENTIAL AMENITIES • Residential neighbours have the setting of their property altered and industrialized. • Boundaries are delineated by security fencing and intrusive CCTV. • Peace and quiet is destroyed by industrial grade traffic and light pollution. • Inverters can overheat in extremely hot weather requiring the use of noisy fans to provide cooling.	<u>Visual Impact</u> The Landscape and Visual Impact Assessment in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** recognises that there will be visual impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme. Whilst some visual impacts will remain at year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting. Where the potential for visual impacts has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A. A detailed Landscape and Ecological Management Plan (which must substantially accord with the Framework Plan) will need to be approved post consent prior to construction with the relevant local authority and this is secured by Requirement 6 in Schedule 2 to the **Draft DCO [APP-220]**. <u>Security fencing, CCTV and Lighting</u> As discussed in **olume I, Chapter 2: The Scheme [APP-054]** the Scheme is not proposing any visible lighting from CCTV or artificial lighting for security purposes during operation. The CCTV will use thermal imaging and Infrared lighting to provide night vision functionality. This is secured in the **Outline Design Parameters Statement [APP-193]**. The CCTV cameras will have fixed, inward-facing viewsheds and will be aligned to capture only the perimeter fence and the area inside the fence, which will not capture publicly accessible areas or any residential curtilages and thereby not resulting in a loss of privacy for any nearby residential occupiers. During operation and maintenance, the Solar PV Site would not require artificial lighting other than during temporary periods of maintenance/repair. The perimeter of the Solar PV Site would be secured with a stock proof mesh-type security fence with wooden posts. Palisade fencing would be used around the BESS Area and On-Site Substation which would provide an added layer of security. These measures are considered to be appropriate for a scheme of this nature, similar to other consented schemes, and are in line with what will be required by the Scheme's insurers. <u>Noise</u> An assessment of noise impacts from equipment, such as transformers and inverters, on residential receptors is presented in **Volume I, Chapter 11: Noise and Vibration [APP-063]**. The BESS Area and On-Site Substation do emit some noise when operating and these have

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		therefore been carefully located with respect to residential receptors. With proposed mitigation measures in place, noise from equipment is not considered to be significant and is likely to be less than ambient noise levels. Working hours are set out in the **Framework CEMP [APP-196]** with the use of high noise generating plant limited to the hours between 08:00 and 18:00 from Monday to Friday and between 08:00 and 13:00 on Saturday. There will be no works undertaken on Sundays or Bank Holidays unless crucial to construction (for example HDD which must be a continuous activity) or in an emergency. A Community Liaison Group will also be set up and is secured by Requirement 3 in Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Officer (or alternative role) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the impacts of the Scheme. The implementation of Requirement 3 will allow feedback on impacts of the Scheme and mitigation measures to be considered and acted upon if required
RR-027	Devastated at the loss of the natural environment and rare species habitats plus public footpaths. Also the devastation to be caused from the increased traffic and pollution. Loss of farming land and crops. Corruption of our village and loss of community.	<u>Impact on habitats</u> **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. As detailed in the **BNG Assessment [APP-200]**, the Scheme is predicted to exceed the BNG target of 10% and this is predicted for each habitat type. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types as secured by the **Framework LEMP [APP-202]** and requirement 6 in Schedule 2 in the **Draft DCO [APP-220].** <u>Public footpaths</u> Landscape and visual impacts on users of footpaths and bridleways have been summarised in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** of the Environmental Statement and assessed in more detail in **Volume III, Appendix 10-6: Visual Assessment [APP-166]**. A number of mitigation measures have been embedded within the design of the Scheme to reduce the impact on users of footpaths and bridleways. These include a minimum distance of 20 m from perimeter fencing to the centre of footpaths where solar infrastructure lies on both sides of a footpath, creating at least a 40 m corridor between fencelines. This reduces to 15 m where solar infrastructure is on one side of the footpath and extends to 30 m from the BESS Area. A further 5 m buffer would be provided between the perimeter fencing and the Solar PV Panels. Offsets will include areas of open grassland and in some instances new structural vegetation. These offsets have been secured through the **Works Plans [APP-214]** and more information can be found in **Framework PRoWMP [APP-202]**. <u>Traffic Impacts and pollution</u>

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		A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within **Volume I, Chapter 13: Transport and Access [APP-065]**. Traffic during the operation and maintenance phase would be minimal. The **Transport Assessment [APP-179]** and **Framework CTMP [APP-206, APP-207]** provide full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes measures such as suitable agreed Heavy Good Vehicle routes and timing restrictions, the use of traffic marshals at site accesses and crossing points, and the development of a communications strategy for those working on the Scheme. A detailed Construction Traffic Management Plan (which must substantially accord with the Framework CTMP) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**. Measures to mitigate transport, air quality and highway safety effects from increased traffic during construction are detailed in Section 13.6.6 of **Volume I, Chapter 13: Transport and Access [APP-065]** of the Environmental Statement. Some measures include (but are not limited to): vehicles using the most direct route to and from the Solar PV Site, vehicles using 'higher' order roads such as A and B classified Roads, promotion of car sharing and implementation of shuttle bus transfers to reduce trips. These measures will ensure so far as possible that the Scheme does not adversely impact on the local highway network or local air quality through increased transport emissions. <u>Loss of farming land</u> In identifying areas that could be suitable for a Solar PV Site the Applicant considered locations that would avoid BMV agricultural land. The results of this exercise are set out in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]**. As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** of the Environmental Statement, an agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV land. Due to the small scale of this BMV land, it is not currently farmed for high-quality agricultural food production and was recently used for biomass crops. With the exception of a relatively small area of BMV land proposed for landscaping, impacts on this BMV land will be temporary and reversible. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**. <u>Loss of community</u> The Applicant recognises that the potential impact of the scheme is a source of concern for local residents. Design and mitigation measures have been incorporated where practicable to minimise these impacts which will be managed to acceptable levels through the suite of management plans proposed and secured via the requirements in Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Group will be also set up and is secured by Requirement 3 in Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Officer (or alternative role) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the

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		impacts of the Scheme. The implementation of Requirement 3 will allow feedback on impacts of the Scheme and mitigation measures to be considered and acted upon if required.
RR-028	The proposed development would give rise to significant impact to the landscape, character and visual amenity of the site and surrounding area which would not be satisfactory mitigated by the proposed benefits of the development. The solar panels and fencing would destroy the wide open views and create an unpleasant corridor along the footpaths and bridleways degrading the area. The scheme is inappropriate and harmful to the rural setting turning open country side to an industrial landscape.	The Landscape and Visual Impact Assessment in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** recognises that there will be landscape and visual impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme. Whilst some impacts will remain at year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting. Where the potential for adverse impacts have been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A. Details of the proposed screening and buffers including existing vegetation to be retained and proposed planting are provided in the **Framework LEMP [APP-203]** and illustrated on the Indicative Landscape Masterplan included as Appendix A of that document, alongside Section 5.4 of the **Design and Access Statement [APP-191]**. Existing hedgerows will be retained as far as practicable. Grassland, native scrub and woodland will be created around the edge of the Solar PV Site and other larger areas of grassland will be created, which will offer habitat for wildlife, including foraging habitat for a number of species. The Scheme design incorporates buffers from residential properties to minimise the potential for adverse impacts on visual amenity. This includes specimen tree and shrub planting or the planting of more mature trees and shrubs, where practicable. All ecological and heritage buffer areas have been designed to provide an appropriate distance to avoid significant effects on the relevant ecological features and heritage assets. There are also buffers from other features that have been considered in the design, including a minimum distance of 20 m either side of the centre of the PRoW where solar infrastructure lies to both sides (creating a 40 m wide corridor between the fence lines), or 15 m from the PRoW centreline if solar infrastructure is to one side only. As recognised in NPS EN-1 Paragraph 5.10.5, the development of new energy infrastructure, at the scale and speed required to meet the current and future need identified, is likely to have some negative effects on landscape and visual amenity which may not be able to be mitigated. The Scheme has sought to minimise impacts through design iteration and careful planting, it is therefore considered that the Scheme accords with Paragraphs 5.10.6 and 5.10.37 of NPS EN-1. For the balancing of effects and benefits required by Paragraphs 5.10.14 and 5.10.35 of NPS EN-1, it is considered that the substantial benefits and need for the Scheme as set out in Section 5 of the **Planning Statement [APP-246]**, including the delivery of CNP Infrastructure to contribute towards meeting national energy objectives outweigh the localised residual landscape and visual effects, and whilst they may be long term, the residual local landscape and visual effects will also be temporary.
RR-028	As a general rule it takes about 200 acres to generate the same electricity by solar panels as ONE North Sea wind turbine. This represents a grossly inefficient use of precious land whatever the quality. The battery storage site is questionable. As the grid connection is to be made at the National Grid Site at Thorpe Marsh, would it not be more feasible to locate the battery storage unit at	As explained in the **Statement of Need [APP-192]** solar power generation has global momentum, and various large-scale schemes are being developed in the UK. NPS EN-1 Paragraph 3.3.4 recognises that no single type of electricity infrastructure will be able to meet any UK government objectives in isolation, so new generators of varied technology, assets that provide flexibility and new networks will all be needed. However, the previous government concluded from its analysis that "*a secure, reliable, affordable, net zero*

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	the site of Thorpe Marsh Power Station which is a remote industrial site served with adequate roads and a rail link.	*consistent system in 2050 is likely to be composed predominantly of wind and solar*" (NPS EN-1 Paragraph 3.3.20). Solar is a proven technology. It is already delivering as part of the UK's electricity system and will continue to deliver further critical benefits to consumers through the urgent and continued decarbonisation, security of supply and affordability. Solar power generation has undergone significant technological advances in scale and commercial efficiency and solar panel efficiency is expected to continue improving over the course of the 2020s. A detailed design process will need to follow if the DCO is granted to ensure the Scheme can make best use of the latest technology and construction methods. The Scheme design retains flexibility to allow for the selection of the most efficient technology close to the point of the construction of the Scheme. The final technology installed will be required to remain within the parameters defined by the **Works Plan [APP-214]** and **Outline Design Parameters Statement [APP-193]**. The Government has identified through its energy policy, most recently in the Overarching National Policy Statement for Energy and the National Policy Statement for Renewable Energy, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme. The need to have flexibility and integrated technologies, such as BESS, is recognised by the Overarching National Policy Statement for Energy (Paragraphs 3.3.5 and 3.3.6). In addition, Paragraph 2.10.10 of the National Policy Statement for Renewable Energy provides policy support for schemes that include co-located solar and storage technologies because both technologies are needed and co-location maximises the efficiency of land use. Further information regarding the need for the Scheme can be found the **Statement of Need [APP-192]** which discusses the need for the Battery Energy Storage System as part of the Scheme. Brownfield land was considered for the Scheme following a review of the local authority brownfield land register. However, it was concluded that there was no available or suitable brownfield land for the Scheme as it would compete or be in conflict with local planning policy seeking to deliver housing and mixed-use developments, and the land next to the Existing National Grid Thorpe Marsh Substation was being developed for another energy project. This is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]**.
RR-028	Solar farms are only 20 - 25% efficient, as they do not produce electricity at times of darkness and reduced day light during winter months when required most, and producing electricity during summer months when less is required. Will the operators of solar farms be entitled to Constraint Payments for over producing as well as benefits from the grant scheme "Contract for Difference" (CfD), financially supported by tax revenue.	<u>Efficiency</u> The Scheme includes a BESS system which will have the ability to store electricity generated from the Scheme and/or import energy from the grid at times of excess generation, discharging the stored energy at times of peak demand and assisting in balancing UK's electricity supplies. Therefore, the Scheme will help ensure reliable and stable electricity grid operation at times of peak demand, thus helping to improve the UK's energy security over the long term. Further information regarding the need for the Scheme can be found the **Statement of Need [APP-192].** discusses the need for the Battery Energy Storage System as part of the Scheme. <u>Contracts for Difference</u>

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		The Contracts for Difference (CfD) scheme is the government's main mechanism for supporting low carbon electricity generation. CfDs incentivise investment in renewable energy by providing developers of projects with high upfront costs and long lifetimes with direct protection from volatile wholesale prices, and they protect consumers from paying increased support costs when electricity prices are high. They benefit both the producers of electricity by providing a predicable income and users of electricity by shielding them from fluctuations in the price of energy. Renewable generators located in Great Britain that meet the eligibility requirements can apply for a CfDs. There have been 6 auctions, or allocation rounds, to date as of 19/02/2025, which have seen a range of different renewable technologies competing directly against each other for a contract. Successful developers of renewable projects enter into a private law contract with the Low Carbon Contracts Company (LCCC), a government-owned company. Developers are paid a flat indexed rate for the electricity they produce over a 15-year period; the difference between the Strike Price (a price for electricity reflecting the cost of investing in a particular low carbon technology) and the Market Reference Price (a measure of the average market price for electricity in the GB market). If the Market Reference Price is below the Strike Price, then the difference is funded by electricity suppliers who ultimately pass the cost onto consumers through electricity bills. If the Strike Price is lower than the Market Reference Price, then generators pay the difference back protecting consumers from rises in electricity costs. Therefore, it is not accurate to say that tax payers pay for CFDs.
RR-028	On the 17th January the Governments Housing Minister Matthew Pennycook rejected the Sunshine Bill proposed by Liberal Democrat MP Max Wilkinson to make all new build dwellings to have solar panels fitted. The Government has a target to build 1,500,000 new houses, using Fenwick Solar Farm as a guide that would equate to an additional 26,000 acres of solar development. Solar Farms should be the last option in the production/generation of electricity when other options are available like rooftops, leaving the land what it is intended for the production of food.	The Government has identified through its energy policy, most recently in the NPS EN-1 and NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. The **Statement of Need [APP-192]** also notes that, whilst decentralised generation has an important role to play in decarbonisation, 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. Therefore, smaller scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, the need for large-scale, ground-mounted solar like this Scheme. Brownfield land was considered for the Scheme following a review of the local authority brownfield land register. However, it was concluded that there was no available or suitable brownfield land for the Scheme as it would compete or be in conflict with local planning policy seeking to deliver housing and mixed-use developments, and the land next to the Existing National Grid Thorpe Marsh Substation was being developed for another energy project. This is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]**.
RR-029	Very much opposed to the Solar Farm. I do not think they have completely taken into account the impact to Moss Road and the surrounding area. The area of their operations means that Moss Road will become a throughfare for 100s of additional heavy vehicles, and also construction traffic, all day and all night, 24x7. The road is already potholed and crumbling along its length, and this will make it much	**Volume I, Chapter 13 Transport and Access [APP-065]** includes a comprehensive assessment of the impact of construction traffic. 13.7.29 onwards sets out the assessment in terms of road safety. Table 13-24 shows that the magnitude of safety impact of the scheme would be very low. This is not a significant impact.

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	worse. The residential houses in Moss already shudder as heavy farm vehicles pass, and this will become much worse. There are elderly people here and children and pets and the road will become much more dangerous. The throughfare to Barnby Dun via Trumfleet Lane is the only route through to there, where the post office, schools and restaurants, and access to other parts of Doncaster, are an important part of life. When the road is closed due to the annual flooding of the river Don (down by Thorpe Bank where the electrical substation is sited) travel to these areas and into Doncaster is made much harder and more lengthy. The works that the Solar Farm is proposing will make this route near-impossible for the 4 years of the build. This will of course have an impact on the quality of life for those who need that route for work, but also on all the businesses and people in Barnby Dun and beyond who rely on the custom from the wide area.	Construction traffic will not be undertaken 24/7. Summer construction working hours will be 07:00–19:00 Monday-Friday and 07:00–13:00 Saturdays. There will be no work on Sundays or bank Holidays, unless crucial to construction (for example for HDD which must be a continuous activity) or in an emergency. Winter working hours are expected to be shorter and worker numbers may be reduced in winter depending on project timing by the chosen contractor. Details of traffic numbers associated with the scheme are provided within Section 6 of **Volume III, Appendix 13-4 Transport Assessment [APP-179].** As shown in Table 6 within this report, the large majority of traffic movements will be associated with staff vehicles between the periods of 06:00-07:00 and 19:00-20:00. This is in conjunction with shift start and end times. Traffic movements during other periods of the working day (e.g. 09:00-17:00) will be restricted to HGV movements, where a maximum of 6 additional two-way movements per hour can be expected. HGV movements will be restricted to between 09:00 and 17:00, avoiding network peaks. This number is associated with the peak of construction and would not be evident throughout the entirety of the construction phase, which in itself is a temporary effect. The **Framework CTMP [APP-206, APP-207]** provides details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes HGV routes which use the most appropriate routes to and from the Solar PV Site, to limit the impact on local lanes and communities. Pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant Local Highway Authority, as referenced in Section 5.2 of the **Framework CTMP [APP-206, APP-207]**. Where these surveys identify upgrades needed to undertake the construction of the Scheme, or following the construction phase then these works will be undertaken.
RR-029	The noise and disruption from the build will impact residents in all the surrounding areas, but in particular Fenwick and Moss, which is completely enclosed by the construction works and traffic movement areas. The quality of life for everyone in the area will be spoiled with the noise from the construction, and then the operational transformers and batteries etc.	An assessment of construction noise effects during construction of the Solar PV Site is provided in **Volume I, Chapter 11: Noise and Vibration [APP-063].** Construction of the Solar PV Site will require an estimated 24 months covering a 407 ha area so construction works would not occur at any one location for extended periods of time. Table 11-10 of Chapter 11 presents worst-case levels of construction noise when activities are taking place in close proximity to sensitive receptors. No adverse construction noise effects are identified so although construction noise may result in temporary effect on the acoustic character of the area, no changes to quality of life are expected. The highest level of noise from solar farm infrastructure (i.e. inverters, transformers, On-Site Substation and BESS Area) at all of the identified sensitive receptors (Table 11-2 of **Volume I, Chapter 11: Noise and Vibration [APP-063]**) is predicted to be, at worst, 35 dB LAeq,Tr. This is a conservative prediction where plant is operating at full capacity and only likely to occur during hot days. This level of noise is equivalent to a whisper or the level of noise that you may experience in a library. As such, the level of operational noise would not be of sufficient magnitude to result in significant effects on health and quality of life.
RR-029	Wildlife will also suffer, and as the area is riven with many Drains, streams and rivers, pollution will inevitably seep into the watercourses and further damage the ecology and wildlife.	The management of construction activities would be controlled through the implementation of the detailed CEMP, which will be developed prior to construction and substantially based on the **Framework CEMP [APP-196]** (and secured by Requirement 15 of Schedule 2 to the **Draft DCO [APP-220]**). Potential water contamination is documented within **Volume I, Chapter 9: Water Environment [APP-060]**. The mitigation measures related to water

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		contamination are documented in Table 3-4 of the Framework CEMP and include measures such as requirements to store oils and hydrocarbons, providing adequate bunding, provision of spill kits, drafting pollution response plans, preparing emergency spillage plans to name a few. The potential for contaminants to leave the solar panel is covered in **Volume I, Chapter 9: Water Environment [APP-060]**, with no significant effect on surface waters predicted given the controls that will be in place, and the nature of the works being undertaken. **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which identifies the habitats and species present and considers if they are likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by detailed ecological surveys and a design team with qualified professional ecologists. This includes avoidance and retention of habitats of greater value for biodiversity, such as hedgerows and woodlands, buffers to protect existing features, and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**.
RR-029	There is a large risk of battery fires, which cause further pollution and damage to the area. Smoke from these is toxic and again, puts residents of Fenwick and Moss at risk.	The **Framework BSMP [APP-205]** extensively documents how the probability of a BESS Container failure incident is minimised by the design and proposed operating procedures, and that if a failure occurs these ensure this will be limited to one BESS Container. The **Framework BSMP [APP-205]** sets out the controls in place to ensure that, in the unlikely event a fire did occur, any impacts arising from the fire (such as fumes, or water run off) will be managed so there are no impacts on local communities beyond the Order limits.
RR-029	There is absolutely no stated benefit to any of the residents in the area, or to the ecology or wildlife in the area. The only expectations are for disruption and damage to the whole area for the entire duration of the site, and also for decades after it is decommissioned. Possibly 50 to 100 years of damage to key Yorkshire land, currently essential to residents, wildlife and plantlife.	**Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. As detailed in the **BNG Assessment [APP-200]**, the Scheme is predicted to exceed the BNG target of 10% and this is predicted for each habitat type. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types as secured by the **Framework LEMP [APP-202]** and requirement 6 in Schedule 2 in the **Draft DCO [APP-220].** During statutory consultation, the Applicant invited ideas for funding community projects which will add value to the local community in Fenwick. The Applicant remains open to receiving ideas and will establish a community benefit scheme upon operation of the Scheme. A Community Liaison Group will be also set up and is secured by Requirement 3 in Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Officer (or alternative role) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the impacts of the Scheme.

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		The implementation of Requirement 3 will allow feedback on impacts of the Scheme and mitigation measures to be considered and acted upon if required.
RR-032	The Case Against Net Zero Policies As the global conversation around climate change intensifies, the push for net zero emissions by 2050 has gained significant traction. While the intentions behind these policies are commendable, it is crucial to consider the implications for our farmers, who are the backbone of our food systems and rural economies. This article aims to highlight the challenges that net zero policies pose to agriculture, supported by relevant statistics and insights. The Economic Impact on Farmers Rising Costs of Compliance: Implementing net zero policies often requires farmers to invest in new technologies and practices, which can be prohibitively expensive. According to a report by the American Farm Bureau Federation, the cost of compliance with stringent environmental regulations could exceed £3 trillion by 2030. This financial burden could lead to increased prices for consumers and reduced profit margins for farmers. Loss of Livelihoods The agricultural sector is already facing significant challenges, including fluctuating commodity prices and climate variability. A study by the USDA found that net zero policies could lead to a 20% reduction in farm incomes by 2030, pushing many farmers into financial distress and threatening their livelihoods.	The Government has identified through its energy policy, most recently in the NPS EN-1 and the NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192],** EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme. Loff of Livelihoods **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]**, the Applicant has estimated (based on previous experience and benchmarking against other comparable solar schemes) that existing agricultural activities support one existing FTE job within the Order limits; once indirect and induced employment is taken into account, two FTE jobs are estimated to be supported. The Applicant has also estimated that to operate and manage the solar farm there would be a gross number of one or two permanent jobs generated by the Scheme; for the purposes of the socio-economic impact assessment, one job is assumed as a worst case scenario, and this increases to two FTE jobs once indirect and induced employment are taken into account. It is thus estimated that there would be no net change in the employment supported by activities within the Order limits as a result of the Scheme.
RR-032	Job Losses in Rural Areas Agriculture is a major employer in rural communities. The National Agricultural Statistics Service reports that agriculture and related industries employ over 21 million people in the U.S. alone. Stricter regulations could lead to job losses, as farms may downsize or close due to increased operational costs.	**Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]**, sets out that the Applicant has estimated (based on previous experience and benchmarking against other comparable solar schemes) that existing agricultural activities support one existing FTE job within the Order limits; once indirect and induced employment is taken into account, two FTE jobs are estimated to be supported. The Applicant has also estimated that to operate and manage the solar farm there would be a gross number of one or two permanent jobs generated by the Scheme; for the purposes of the socio-economic impact assessment, one job is assumed as a worst case scenario, and this increases to two FTE jobs once indirect and induced employment are taken into account. It is thus estimated that there would be no net change in the employment supported by activities within the Order limits as a result of the Scheme.
RR-032	The Environmental Considerations Carbon Sequestration Potential Farmers play a crucial role in carbon sequestration through practices such as cover cropping, no-till farming, and agroforestry. According to the Food and Agriculture Organization (FAO), sustainable agricultural practices can sequester up to 1.5 billion tons of carbon dioxide equivalent annually. Instead of imposing stringent net zero targets, policymakers should incentivize these practices, allowing farmers to contribute positively to climate goals without compromising their economic viability.	**Volume III, Appendix 6-2: Climate Change Risk Assessment (CCRA) [APP-139]** has been conducted which identifies potential climate change impacts. The CCRA compares the existing activities undertaken on the land e.g. if no development were to take place, compared with the Scheme. The CCRA concludes that no significant effects are anticipated.
RR-032	Biodiversity and Soil Health Many net zero policies focus on reducing emissions from livestock and fertilizers, which could inadvertently harm biodiversity and soil health. A report from the International Union for	The Defra R and D project SP08016, Best Practice for Managing Soil Organic Matter in Agriculture (2009), shows that the reversion of arable land to grassland for an extended fallow period, will enable a recovery of soil health. Under a solar farm the soil health will

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	Conservation of Nature (IUCN) indicates that over-regulating livestock farming could lead to a decline in pasture-based systems that support diverse ecosystems. Healthy soils are essential for carbon storage, and policies that undermine soil health could counteract climate goals.	benefit from 40 years of perennial plant cover and no ploughing. This will enable a recovery of soil organic matter depleted by cultivation. Benefits of this recovery include improving soil structural stability which enhances rainfall infiltration and reduces topsoil erosion by wind and rain. Further information can be found in the **Framework SMP [APP-199]**. Prior to the start of construction, a detailed Soil Management Plan will be submitted to and approved by the local authority (as outlined in the **Framework CEMP [APP-196]** and secured by Requirement 15 of Schedule 2 to the **Draft DCO [APP-220]**). This will ensure soils are not degraded and farming activities can re-commence following completion of the construction phase along the Grid Connection Corridor and decommissioning phase within the Solar PV Site.
RR-032	The Social Implications Food Security Risks As farmers face increased pressure to comply with net zero policies, food production could be jeopardized. The World Food Programme warns that climate policies that do not consider agricultural productivity could exacerbate food insecurity, particularly in vulnerable populations. A decline in domestic food production could lead to increased reliance on imports, making food systems more vulnerable to global market fluctuations. Rural Community Decline The decline of farming operations due to unsustainable policies could lead to the erosion of rural communities. According to the USDA, rural areas have already seen a 20% decrease in population over the last decade. Policies that further threaten the agricultural sector could accelerate this trend, leading to abandoned farms and diminished community resources. Conclusion While the goal of achieving net zero emissions is essential for combating climate change, it is imperative that we consider the implications for our farmers. The economic, environmental, and social challenges posed by stringent net zero policies could undermine the very fabric of our agricultural systems. Instead of imposing blanket regulations, policymakers should work collaboratively with farmers to develop sustainable practices that balance environmental goals with economic viability. By supporting our farmers, we can ensure a resilient food system that contributes to both climate goals and rural prosperity.	In identifying areas that could be suitable for a Solar PV Site the Applicant considered locations that would avoid BMV agricultural land. To identify these locations the Applicant used provisional ALC mapping published by Natural England. The results of this exercise are set out in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement. As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** of the Environmental Statement, an agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV land. Due to the small scale of this BMV land, it is not currently farmed for high-quality agricultural food production and was recently used for biomass crops. With the exception of a relatively small area of BMV land proposed for structural planting, impacts on this BMV land will be temporary and reversible. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**. Prior to the start of construction, a detailed Soil Management Plan will be submitted to and approved by the local authority (as outlined in the **Framework CEMP [APP-196]** and secured by Requirement 15 of Schedule 2 to the **Draft DCO [APP-220]**). This will ensure soils are not degraded and farming activities can re-commence following completion of the construction phase along the Grid Connection Corridor and decommissioning phase within the Solar PV Site.
RR-034	The areas of concern which will impact on myself and family are as follows: The effects on/ loss of access to public rights of way which pass throughout the proposed site will have a detrimental impact on the mental well being of myself and others within the immediate and wider community. The transformation of green space and wider views across the now unfenced farm land which changes in appearance throughout the year to a minimum of 40 year industrial landscape with nothing but the view of the underside of solar panels through a 6 foot plus wire fenced path is a thought I find most disturbing.	There would be no loss of access to public rights of way during construction or operation, although temporary diversions will be put in place for sections of Fenwick 16, Moss 6 and Fenwick 14, and permanent diversions for sections of Sykehouse 29, Moss 6 and Fenwick 14. More detail on these can be found in the **Framework PRoWMP [APP-202]**. Landscape and visual impacts on users of footpaths and bridleways have been summarised in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** and assessed in more detail in **Volume III, Appendix 10-6: Visual Assessment [APP-166]**. Effects have been minimised through the use of embedded mitigation, which is detailed in Section 10.7 of **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]**. This includes offsets from footpaths, including a minimum distance of 20 m from perimeter fencing to the centre of footpaths where Solar PV Infrastructure lies on both sides of a footpath, creating at least a 40 m corridor between fence lines. This reduces to 15 m where Solar PV Infrastructure is on one

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		side of the footpath and extends to 30 m from the BESS Area. A further 5 m buffer would be provided between the perimeter fencing and the Solar PV Panels. Where practicable, new vegetation has been included as part of the Scheme to reduce impacts on users of footpaths within the Order limits and the surrounding area, as shown on the Indicative Landscape Masterplan in Appendix A of the **Framework LEMP [APP-203].**
RR-034	There will also be a huge negative impact on the local wildlife, including ground nesting birds such as sky larks, lapwings and other predatory birds, owls, raptors etc along with deer, badgers, foxes, hares, water voles, newts to name a few species which people come to the local area to see so affecting the local tourism economy.	**Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which identifies the habitats and species present and considers if they are likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by detailed ecological surveys and a design team with qualified professional ecologists. This includes avoidance and retention of habitats of greater value for biodiversity, such as hedgerows and woodlands, buffers to protect existing features, and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. The Scheme will create and enhance a wide range of habitats, such as grasslands, hedgerows and trees, that will benefit wildlife present in the area. Details of habitat creation and enhancements are set out in the **Framework LEMP [APP-202]**.
RR-034	The proposed size of this worries me greatly for multiple reasons not least of the financial impact/ loss to my self in falling property values and future financial security for my family. I chose to raise my family in the countryside and as such paid a premium to do this and not to live in the middle of an industrial estate. There is no financial benefit to the immediate local community affected by this site and in fact quite the opposite with property prices being affected detrimentally with only the land owners and financial stakeholders profiting.	Impacts on property prices are not a material consideration in the NSIP planning process and therefore are not a factor to be considered by the Secretary of State when determining the application for development consent. The Applicant will comply with the Compensation Code in respect of any compulsory acquisition associated with the Scheme, including any injurious affection or depreciation of land value in accordance with the relevant statutory tests.
RR-034	In a time when the government itself is telling farmers to sacrifice wildlife for food production there is a proposed 800+ acre solar site for land which regardless of its soil grade does produce food nonetheless. In essence we will starve with the lights on or maybe not as any electricity produced here will be sent to other areas of the country.	The Government has identified through its energy policy, most recently in the NPS EN-1 and the NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. The Applicant notes this comment. With regards to the use of agricultural land, in identifying areas that could be suitable for a Solar PV Site the Applicant considered locations that would avoid BMV agricultural land. The results of this exercise are set out in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement. As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** of the Environmental Statement, an agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV land. Due to the small scale of this BMV land, it is not currently farmed for high-quality agricultural food production and was recently used for biomass crops. With the exception of a relatively small area of BMV land proposed for planting, impacts on this BMV land will be temporary and reversible. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be

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		available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**. Prior to the start of construction, a detailed Soil Management Plan will be submitted to and approved by the local authority (as outlined in the **Framework CEMP [APP-196]** and secured by Requirement 15 of Schedule 2 to the **Draft DCO [APP-220]**). This will ensure soils are not degraded and farming activities can re-commence following completion of the construction phase along the Grid Connection Corridor and decommissioning phase within the Solar PV Site.
RR-034	All the above is before we've gotten to the fact that it will be an estimated 10 years before each panel is carbon neutral purely from its own production but there's also installation and maintenance, battery manufacture etc, farmers carbon footprint increase due to travelling further from base farms with equipment to farm land elsewhere.	As stated in **Volume I, Chapter 6: Climate Change [APP-058]**, the total emissions associated with the Scheme have been estimated to be 542,681 tCO_2e. Construction phase emissions are estimated to be 303,740 tCO_2e (see Table 6-13 of **Volume I, Chapter 6: Climate Change [APP-058]**), including 266,278 tCO_2e directly associated with the manufacture of materials and components of the Solar PV Panels. Operation emissions operational and maintenance emissions are estimated to be 237,905 tCO_2e (see Table 6-15 of **Volume I, Chapter 6: Climate Change [APP-058]**), and includes embodied carbon in replacement parts, plant and machinery requirements, fuel and water use during maintenance activities, transportation of materials and waste to and from the Solar PV Site, and waste management activities include the landfill or recycling of replaced parts. Decommissioning emissions are estimated to be 1,035 tCO_2e (see Table 6-15 of **Volume I, Chapter 6: Climate Change [APP-058]**), accounting for disposal and recovery of material emissions. As stated under Section 6.7 of **Volume I, Chapter 6 Climate Change [APP-058]** "*An existing gas fired CCGT, currently the most carbon-efficient fossil-fuelled technology available, can be assumed to operate with a representative carbon intensity of 354 gCO2e /kWh. The operational intensity of the Scheme is therefore 95% lower than that of the CCGT. Each kilowatt hour of electricity generated by the Scheme will emit 336 gCO2e less than if it was generated by an existing gas fired CCGT generating facility. Combining this figure with the estimated lifetime output from the Scheme indicates an overall lifetime carbon reduction, relative to the counterfactual existing CCGT, of over 4 million tCO_2e. Given that the construction and decommissioning phase emissions for the Scheme will be 542,681 tCO_2e, the breakeven period for emissions will be under 5 years of operation. Therefore, the total GHG savings for the remaining 35 years will be approximately 3.5 million tCO_2e.*"
RR-034	The risk and associated pollutants from possible incidents in smoke plumes and water run off containing sulphuric acid leaving long term effects.	**Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]** describes the approach to fire water collection. The BESS Area will be located on concrete foundations and surrounded by drainage with an impermeable base. Any water run off from a BESS Container fire will be directed to this impermeable drainage, which will have an automatic lock on the outlet when a fire broke out. The battery system and the transformers serving the BESS Container will be automatically electrically isolated when a fire is detected within a container. This will ensure that any potentially contaminated water from a BESS Container fire can be tested, and if necessary be tankered offsite for treatment. The **Framework BSMP [APP-205]** details that smoke, fire, and gas detection will be integrated into the design of the BESS Area, and also details other monitoring/alert features which are capable to automatically shut down systems and align fully with Fire Safety guidance. The Framework BSMP also states that residential properties will be at least 500 m

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		from the BESS Area in order to ensure that smoke, fire, and gas do not make it offsite to neighbouring properties.
RR-034	Then there's the disruption to the local and wider area during installation from traffic which would be using road infrastructure which is in adequate for existing traffic never mind large commercial vehicles which will impact on the safety of not only my own family but that of the local communities.	Pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant Local Highway Authority, as referenced in Section 5.2 of the **Framework CTMP [APP-206, APP-207]**. Where these surveys identify upgrades needed to undertake the construction of the Scheme, or following the construction phase then these works will be undertaken. **Volume I, Chapter 13 Transport and Access [APP-065]** includes a comprehensive assessment of the impact of construction traffic. 13.7.29 onwards sets out the assessment in terms of road safety. Table 13-24 shows that the magnitude of safety impact of the scheme would be very low. This is not a significant impact. The **Framework CTMP [APP-206, APP-207]** provides details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. Measures to be implemented during the construction and decommissioning phases include: a. Suitable access points to enable movement of vehicles into the Solar PV Site and Grid Connection Corridor, where appropriate; b. The creation of a junction bellmouth where required for access points, to prevent any potential safety impact associated with construction activity (details on how the junction bellmouth will be designed are provided in the Framework CTMP; c. Routeing of HGVs and AILs in accordance with the findings of the routeing review for large vehicles as set out in the Framework CTMP; d. Restricting HGV movements to certain routes: Moss Road, SRN, A19; e. Directing construction staff (e.g. non-HGV vehicles) to take the most direct route to the Scheme using 'higher' order roads, such as A and B classified roads of the SRN; f. Encouraging local construction workers to car-share to reduce single occupancy car trips; g. Implementing a shuttle bus service to transfer non-local workers to/from local worker accommodation or pick-up locations (assumed minibus capacity of 25), to reduce vehicle trips on the surrounding highway network.
RR-034	I could go on but for now this I feel is enough to register my interest. This will impact on myself and my family who live within the thick of the proposed site which if allowed will not be a solar farm in a village but villages within a solar farm as it encompasses neighbouring villages as it grows in size. I am a local councillor so also have an interest in how it affects the local constituents. Let it be said that I'm not against the solar farm in its entirety but the sheer size of this proposed development and the fact this is even being considered when smaller developments by the same proposer nationally are being rejected, gives me great concern	The Applicant notes the comment on whether the scale of the Scheme is appropriate. The Government has identified through its energy policy, most recently in the NPS EN-1 and NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme. The Applicant's design team has worked collaboratively to provide an integrated and responsive design appropriate for the local environment which has been informed by the process of environmental impact assessment, statutory consultation and wide-ranging stakeholder engagement. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable, as set out in the **Consultation Report [APP-022]** and summarised in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]**.

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RR-035	Excessive size, over development on an industrial scale the preposed solar site with its associated hazardous infrastructure will almost cover/dwarf 70% of Fenwick creating no balance to the community and biodiversity. Insensitive location intrusive impact on rural landscape and its inhabitants causing abhorrent upheaval disturbance for decades. Transforming a quite rural landscape into a busy industrial wasteland -all created, manufactured and imported from abroad, mostly China with huge carbon footprint.	Scale The Government has identified through its energy policy, most recently in the NPS EN-1 and the NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and wide-ranging stakeholder engagement. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable, as set out in the **Consultation Report [APP-022]** and summarised in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]**. As set out in the **Design and Access Statement [APP-191]**, design principles have guided, and will continue to guide, the Scheme from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures. Impact on rural landscape The Landscape and Visual Impact Assessment in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** of the Environmental Statement recognises that there will be landscape and visual impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme. Whilst some impacts will remain at year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting. Where the potential for adverse visual effects has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A. Solar panels The decision of which solar panels will be used will be one of the last decisions to be made when looking to place orders which would be after a decision made by the Secretary of State on the application. The Applicant will source the most appropriate materials to deliver the Scheme. The technical complexity of the Scheme means that some materials will be sourced from countries outside of the UK. The majority of the panel components will be recyclable and materials can be recovered and reused.
RR-035	Health and safety concerns -vast amounts of increased traffic on small country roads, creating associated problems of noise, pollution and increased risk of accidents. Importing further problems of increased crime particular theft of vehicles and equipment associated with construction.	Health Concerns Chapters of the ES have presented effects of the Scheme which have the potential to impact on both physical and mental health. Measures to mitigate transport, air quality and highway safety effects from increased traffic during construction are detailed in Section 13.6.6 of **Volume I, Chapter 13: Transport and Access [APP-065]**. Some measures include (but are not limited to): vehicles using the most direct route to and from the Solar PV Site, vehicles using 'higher' order roads such as A and B classified Roads, promotion of car sharing and implementation of shuttle bus transfers to reduce trips. These measures will ensure so far as

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		possible that the Scheme does not adversely impact on the local highway network or local air quality through increased transport emissions. Consideration has been given to traffic routing, timing, and access points to the Scheme to minimise noise impacts at existing receptors as detailed in **Volume I, Chapter 11: Noise and Vibration [APP-063].** Table 11-14 of Chapter 11 presents the results of the construction noise assessment and identifies that there would be no material change in noise levels due to construction traffic. HGV on the highway network would be managed through the **Framework CTMP [APP-206, APP-207]** secured via DCO Requirement 13. That document also includes appropriate routing of construction and decommissioning traffic on public roads and along access tracks <u>Safety concerns</u> As described in **Volume I, Chapter 2: The Scheme [APP-054]**, the Scheme incorporates fencing and various security measures, such as CCTV with 24-hour response personnel, which will mitigate against the risk of criminal activity. The perimeter of the Solar PV Site would be secured with a stock proof mesh-type security fence with wooden posts. Palisade fencing would be used around the BESS Area and On-Site Substation which would provide an added layer of security. These measures are considered to be appropriate for a scheme of this nature, similar to other consented schemes, and are in line with what will be required by the Scheme's insurers.
RR-035	Inefficient production of solar electric power compared to the amount of space /land required for the installation. The preposed energy generated will be intermittent and therefore unable to produced a continuous supply even with the support of the hazardous battery storage.	NPS EN-1 at Paragraph 3.3.20 recognises that Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply. The Scheme design retains flexibility to allow for the selection of the most efficient solar technology at the time of construction. Solar generation technology is developing at a fast pace, with better, more efficient and more cost-effective Solar PV Panels coming to the market. The Applicant is therefore seeking to retain the flexibility to choose the precise technology close to the point of the construction of the Scheme. This will enable the optimum production of renewable energy and subsequently reduce cost for the end user. The final technology installed will be required to remain within the parameters defined by the **Works Plan [APP-214]** and **Outline Design Parameters Statement [APP-193]**.
RR-035	Although Solar Farms maintain that they are not subsidised, they do benefit from a grant called "Contract for Difference" (CfD), where they bid for contracts with specific Strike Price. (amount that they receive). If the market price for the electric supplied is higher than the strike price they are able to sell at the higher price. If the market price is lower the Government will pay the short fall. Therefore they are supported by the government and ultimately paid for by the tax payer.	The CfD scheme is the government's main mechanism for supporting low carbon electricity generation. CfDs incentivise investment in renewable energy by providing developers of projects with high upfront costs and long lifetimes with direct protection from volatile wholesale prices, and they protect consumers from paying increased support costs when electricity prices are high. They benefit both the producers of electricity by providing a predicable income and users of electricity by shielding them from fluctuations in the price of energy. Renewable generators located in Great Britain that meet the eligibility requirements can apply for a CfDs. There have been 6 auctions, or allocation rounds, to date as of 19/02/2025, which have seen a range of different renewable technologies competing directly against each other for a contract. Successful developers of renewable projects enter into a private law contract with the LCCC, a government-owned company. Developers are paid a flat indexed rate for the electricity they produce over a 15-year period; the difference between the Strike Price (a price for electricity reflecting the cost of investing in a particular low carbon technology) and the Market Reference Price (a measure of the average market price for electricity in the GB market).

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		If the Market Reference Price is below the Strike Price, then the difference is funded by electricity suppliers who ultimately pass the cost onto consumers through electricity bills. If the Strike Price is lower than the Market Reference Price, then generators pay the difference back protecting consumers from rises in electricity costs. Therefore, it is not accurate to say that tax payers pay for CFDs.
RR-035	The development will cause an environmental and social injustice to the the area and community for decades which cannot be quantified in any statistical information presented by the developer. The detrimental and unpleasant approach to the rural settlement and community, exploiting a unique small village, removing agricultural land required for increased food production and ultimately food security which seems of no significance to the developers. The planning process so far has created conflict forcing a development that has not been community lead or supported , clearly the intension is to exploit and eliminate a rural area for an industrial urban sprawl.	Environmental Effects **Volume I, Chapter 6: Climate Change [APP-058], Volume I, Chapter 7: Cultural heritage [APP-059], Volume I, Chapter 8: Ecology [APP-060], Volume I, Chapter 9: Water Environment [APP-061], Volume I, Chapter 10: Landscape and Visual Amenity [APP-062], Volume I, Chapter 11: Noise and Vibration [APP-063], Volume I, Chapter 12: Socio-Economics and Land Use [APP-226], Volume I, Chapter 13: Transport and Access [APP-065],** and **Volume I, Chapter 16: Other Environmental Topics of the ES [APP-066]** summarise the environmental effects of the development. A summary of the cumulative effects can be found within **Volume I, Chapter 15: Cumulative Effects and Interactions [APP-067].** A summary of the effects can be found within **Volume I, Chapter 18: Summary of Environmental Effects [APP-068].** Loss of Agricultural Land In identifying areas that could be suitable for a Solar PV Site the Applicant considered locations that would avoid BMV agricultural land. The results of this exercise are set out in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement. As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** of the Environmental Statement, an agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV land. Due to the small scale of this BMV land, it is not currently farmed for high-quality agricultural food production and was recently used for biomass crops. With the exception of a relatively small area of BMV land proposed for structural planting, impacts on this BMV land will be temporary and reversible. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**. Application process The Applicant carried out three rounds of consultation during the pre-application period ahead of finalising its proposals for the Scheme. The Applicant also encouraged contact with the project team during the statutory and targeted consultations via email, freephone and Freepost to answer any queries or questions which were not answered at consultation events or covered within the consultation material. Full details on the consultation process are set out within the **Consultation Report [APP-022].** The Solar PV Site has been chosen through a thorough site selection process which is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement and assessed against relevant planning policy in the **Planning Statement [APP-246]**. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable

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RR-036	Road access to the site. I understand there are to be numerous heavy goods vehicles containing the solar panels, equipment and machinery to install the panels travelling on Moss Road from Askern through Moss. Have any of the planners actually travelled on that road? It is very much like a tarmac jigsaw puzzle with numerous pieces missing! There are two very busy level crossings where many of the wagons will be held up (presumably these will be EVs thereby not causing pollution in the area). Are the roads to be used going to be upgraded and adequate drainage created before commencement of the project?	Pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant Local Highway Authority, as referenced in Section 5.2 of the **Framework CTMP [APP-206, APP-207]**. Where these surveys identify upgrades needed to undertake the construction of the Scheme, or following the construction phase then these works will be undertaken.
RR-036	How safe will the battery storage facility be? I have recently read about a serious fire at such a place in America with plumes of smoke that could pose a health threat to humans and wildlife. Improvement and development are important and necessary but fully extensive research and testing must be exhausted before implementation.	The **Framework BSMP [APP-205]** extensively documents how the probability of a BESS Container failure incident is minimised by the design and proposed operating procedures, and that if a failure occurs these ensure this will be limited to one BESS Container. The **Framework BSMP [APP-205]** sets out the controls in place to ensure that, in the unlikely event a fire did occur, any impacts arising from the fire (such as fumes, or water run off) will be managed so there are no impacts on local communities beyond the Order limits. The **Draft DCO [APP-220]** includes a requirement (requirement 5 of Schedule 2) for the submission and approval of a detailed Battery Safety Management Plan. This will need to be substantially in accordance with the **Framework BSMP [APP-205]** and will ensure the implementation of control measures to manage battery safety.
RR-038	As a local resident who will be directly impacted by this development, I feel compelled to express my concerns regarding this proposed development. I accept that there is a requirement and fundamental need to decarbonise the UK economy, there are other ways to achieve this which are less environmentally damaging. By investing in initiatives such as rooftop solar both for domestic and industrial buildings, we can achieve the same without removing significant amounts of land across the UK from the agricultural system. The proposal for this solar farm is a prime example of this.	The Government has identified through its energy policy, most recently in NPS EN-1 and the NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. The **Statement of Need [APP-192]** also notes that, whilst decentralised generation has an important role to play in decarbonisation, 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. Therefore, smaller scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, the need for large-scale, ground-mounted solar like this Scheme. Brownfield land was considered for the Scheme following a review of the local authority brownfield land register. However, it was concluded that there was no available or suitable brownfield land for the Scheme as it would compete or be in conflict with local planning policy seeking to deliver housing and mixed-use developments, and the land next to the Existing National Grid Thorpe Marsh Substation was being developed for another energy project. This is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement.
RR-038	The building of a massive solar farm around the small villages of Moss and Fenwick is inappropriate for the area. The removal of significant amounts of productive agricultural land will only result in increased challenges to providing food security for the UK.	In identifying areas that could be suitable for a Solar PV Site the Applicant considered locations that would avoid BMV agricultural land used provisional ALC mapping published by Natural England. The results of this exercise are set out in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement. As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** of the Environmental Statement, an agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV land. Due to the small scale of this BMV land, it is not currently farmed for high-quality agricultural food production and was recently used for biomass crops.

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		With the exception of a relatively small area of BMV land proposed for structural planting, impacts on this BMV land will be temporary and reversible. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**.
RR-038	There is an abundant and diverse wildlife population in the Moss and Fenwick area, living locally we regularly see deer, owls and bats on our land. The erection of large security fencing around several hundred acres of land will drive many species of wildlife from the area, harming the local environment and biodiversity.	**Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which identifies the habitats and species present and considers if they are likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by detailed ecological surveys and a design team with qualified professional ecologists. This includes avoidance and retention of habitats of greater value for biodiversity, such as hedgerows and woodlands, buffers to protect existing features, and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220].** The Scheme will create and enhance a wide range of habitats, such as grasslands, hedgerows and trees, that will benefit wildlife present in the area. Details of habitat creation and enhancements are set out in the **Framework LEMP [APP-202].** The security fencing will be aligned to maintain connectivity across the landscape for communities and local wildlife. In addition, passes in the base of the fencing will be included to allow small/medium mammals to continue to access the areas continuing solar panels.
RR-038	The size and scale of such a development in a rural area, consisting of small local roads means that during construction the local road network will be under severe pressure. Currently the local road network is significantly underinvested and is in a very poor state of repair. The number of large and oversized vehicles required to bring the huge numbers of solar panels and other equipment to the proposed site will have a significant impact on the local area. Through the consultation process Boom Power clearly demonstrated that they have no understanding of the local area and the impact that their development would have.	Details of traffic numbers associated with the scheme are provided within Section 6 of **Volume III, Appendix 13-4 Transport Assessment [APP-179]**. As shown in Table 6 within this report, the large majority of traffic movements will be associated with staff vehicles between the periods of 06:00-07:00 and 19:00-20:00. This is in conjunction with shift start and end times. Traffic movements during other periods of the working day (e.g. 09:00-17:00) will be restricted to HGV movements, where a maximum of 6 additional two-way movements per hour can be expected. This number is associated with the peak of construction and would not be evident throughout the entirety of the construction phase, which in itself is a temporary effect. The **Framework CTMP [APP-206, APP-207]** provides details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes HGV routes which use the most appropriate routes to and from the Order limits , to limit the impact on local lanes and communities. Swept Path Analysis has been undertaken for construction routes and construction accesses. These accesses have been designed to accommodate the largest vehicles expected to use them, and local off-site highways improvements in relation to access locations such as verge clearance and hedge cutting will be made where necessary. Pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant Local Highway Authority, as referenced in Section 5.2 of the

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		Framework CTMP [APP-206, APP-207]. Where these surveys identify upgrades needed to undertake the construction of the Scheme, or following the construction phase then these works will be undertaken.
RR-038	The original plan was for just a solar farm. The scheme now proposes a large battery storage location. This is proposed to be on the doorstep of the village of Moss. The original proposal was for the battery storage to be located at a disused power station. This proposal was much more appropriate as it was further away from houses and provided a direct link into the National Grid	The need to have flexibility and integrated technologies, such as BESS, is recognised by the NPS EN-1 (Paragraphs 3.3.5 and 3.3.6). In addition, Paragraph 2.10.10 of the NPS EN-3 provides policy support for schemes that include co-located solar and storage technologies because both technologies are needed and co-location maximises the efficiency of land use. The **Statement of Need [APP-192]** discusses in more detail the need and benefits for the Battery Energy Storage System as part of the Scheme. The Statutory Consultation phase gave those interested in the Scheme an opportunity to comment on the proposals, whilst proving an opportunity for consultees to share their feedback on the changes made to the Scheme since non-statutory consultation. The BESS Area has always formed part of the Scheme. The changes presented at Statutory Consultation included refinement of the proposals for BESS Area so that they would be located in a single area within the Solar PV Site and at least 500 m from any residential property.
RR-039	I am one of the landowners, putting land into the scheme. I would like to explain why I feel this would be beneficial to the land and the surrounding villages. The land at Fenwick is of very poor quality, very heavy clay and full of blackgrass due to this it doesn't allow for delayed drilling which is a must for blackgrass control. Due to the condition of the land, travelling on the fields is impossible during the wet periods (which are getting more frequent) making it very difficult to apply fertilisers and sprays at the most effective times. The soil quality is of such poor quality only basic crops can be grown thus also reducing viability of the land. Some years we cannot even plant a crop as the quality of the land is so poor, which affects the ability to sustain a stable income.	The Applicant notes this comment.
RR-039	Once the solar farm is built this will eradicate the need to travel over the land using large machinery, which will encourage more wildlife to the area due to the lack of disturbance, this will also encourage a natural habitat due to the longevity of the scheme.	The Applicant notes this comment. As detailed in the **BNG Assessment [APP-200]**, the Scheme is predicted to exceed the BNG target of 10% and this is predicted for each habitat type. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types as secured by the **Framework LEMP [APP-202]** and requirement 6 in Schedule 2 in the **Draft DCO [APP-220].**
RR-039	Once the solar farm is built, there will be no need to travel through the village of Fenwick with heavy machinery which usually clogs up the roads and produces a large amount of noise. The constructed solar farm will need little regular attention, which will significantly reduce the noise nuisance levels within the village, especially during the days and nights of harvest.	The Applicant notes this comment.
RR-039	The high hedgerows and the commitment to plant more hedges and natural green areas will allow the wildlife to flourish and the native wild plants to thrive. I believe the above factors will enhance the area and those surrounding the village of Fenwick. The land around and under the panels are to be grazed by sheep thus encouraging a more sustainable habitat and a natural control over the blackgrass issues, which will eliminate the need for the use of expensive and harsh chemicals. Due to the positioning of the solar farm, it cannot be seen from any roads leading into the village or out of the village, it will be virtually silent with only the occasional maintenance vehicle traveling throughout the site.	The Applicant notes this comment. Where the potential for adverse visual effects has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A.

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	The presence of the solar farm will not block any public footpaths or restrict access to the land, allowing locals to carry on using the pathway to walk. Due to the enhancement of the natural green area, residents will be able to enjoy the presence of wildlife and natural greenery which I believe will enrich the land itself.	
RR-040	Loss of wild life and bird habitat. Loss of public enjoyment of rural area. Noise and visual pollution due to installation of panels and associated batteries inverter. Risk of fire. Unsuitable Road network to proposed site. Risk of proposed site expansion in near future. Danger to children due to heavy traffic past junior school. Traffic disruption and delay due to increase in volume and routed via 2 level crossing installations. Danger of accidents due to poor visibility at proposed route junction. Loss of visitors to local businesses. No real value to local area. In my opinion this installation is an insult to our rural life and is supported by our local MP who appears to be on an ego trip under the guise of net zero targets. He should spend more time talking to the big polluters elsewhere in the world.	Loss of wildlife and bird habitat **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. As detailed in the **BNG Assessment [APP-200]**, the Scheme is predicted to exceed the BNG target of 10% and this is predicted for each habitat type. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types as secured by the **Framework LEMP [APP-202]** and requirement 6 in Schedule 2 in the **Draft DCO [APP-220].** Noise and visual pollution An assessment of noise impacts from equipment, such as transformers and inverters, on residential receptors is presented in **Volume I, Chapter 11: Noise and Vibration [APP-063]** of the Environmental Statement. With proposed mitigation measures in place, noise from equipment is not considered to be significant and is likely to be less than ambient noise levels. Working hours are set out in the **Framework CEMP [APP-196]** with the use of high noise generating plant limited to the hours between 08:00 and 18:00 from Monday to Friday and between 08:00 and 13:00 on Saturday. There will be no works undertaken on Sundays or Bank Holidays unless crucial to construction (for example HDD which must be a continuous activity) or in an emergency. Risk of fire The Applicant emphasises that the BESS Area was selected to accommodate a minimum buffer zone of 500 metres to any residential properties, which minimises any visual or noise impacts to receptors and ensures disruption to the local community is minimised if a BESS Container failure should occur. The **Framework BSMP [APP-205]** extensively documents how the probability of a BESS Container failure incident is minimised by the design and proposed operating procedures, and that if a failure occurs these ensure this will be limited to one BESS Container. The **Framework BSMP [APP-205]** sets out the controls in place to ensure that, in the unlikely event a fire did occur, any impacts arising from the fire (such as fumes, or water run off) will be managed so there are no impacts on local communities beyond the Order limits. Unsuitable road network and traffic A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within **Volume I, Chapter 13: Transport and Access [APP-065]** of the Environmental Statement. Traffic during the operation and maintenance phase would be minimal. The **Transport Assessment [APP-179]** and

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		Framework CTMP [APP-206, APP-207] provide full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes measures such as suitable agreed Heavy Good Vehicle routes and timing restrictions, the use of traffic marshals at site accesses and crossing points, and the development of a communications strategy for those working on the Scheme. A detailed Construction Traffic Management Plan (which must substantially accord with the Framework CTMP) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**. Access locations for construction vehicles have been selected in order to minimise disruption to local road users and consider any localised constraints. Further details on routing and mitigation measures can be found in the **Framework CTMP [APP-206, APP-207]**. The majority of construction staff and HGV vehicle movements are expected to occur outside of the traditional school arrival and departure times through Askern (e.g. 08:00-09:00 and 15:00-16:00). For example, staff movements are expected between 06:00-07:00 in the AM and between 19:00-20:00 in the PM. HGVs are expected to move between 09:00-17:00, therefore it is possible that some movements could occur along Moss Road in Askern during the PM school pick up period. During the 15:00-16:00 period a total of 4 two-way HGVs are expected through Askern. These movements would be managed through the detailed CTMP. The **Framework CTMP [APP-206, APP-207]** outlines the specific vehicle routing requirements during construction. The report highlights that both the Askern and Moss rail level crossings would need to be used to enable access to the Solar PV Site. The **Framework CTMP [APP-206, APP-207]** also sets out measures to minimise the impacts and disturbance caused by construction traffic on the local and strategic road network. This includes a description of measures to be introduced to minimise impacts associated with traffic using the level crossings. The Applicant does not propose to affect the operation of the level crossing either through use as part of construction routes or through any proposed temporary traffic management. Where staff or delivery traffic uses the level crossing, drivers will comply with the operation of the level crossing, rather than affecting the operation of the crossing itself. As described in Section 4.4 of the **Framework CTMP [APP-206, APP-207]**, vehicle swept paths have been carried out to demonstrate that construction vehicles will be able to turn in/out of the proposed Site accesses. It should be noted that traffic marshals will be in place to control HGV movements at the accesses to ensure these movements are carried out safely. An appropriate level of visibility will be achievable to/from the access. Further details can be found in **Framework CTMP [APP-206, APP-207**]. <u>Risk of proposed site expansion</u> The Applicant's Scheme is as presented in the application and will need to be carried out in the accordance with the approved plans and documentation, including the parameters defined by the **Works Plan [APP-214]** and **Outline Design Parameters Statement [APP-193]**. In the unlikely event that changes are required, the Planning Act 2008 includes a provision for making changes to a DCO once determined, but this would require further input from local authorities and the local community and the changes would not extend beyond the Order limits. <u>Loss of visitors to local businesses</u> **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226] i**dentifies socio economic benefits of the Scheme through the generation of 225 total net jobs per annum and

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		an estimated generation of £12.6 million per year to the national economy during the construction phase, of which £5.7 million would be of benefit to the local area within 60-minute driving time of the Scheme. The chapter also concludes that there are no likely significant adverse socio-economic effects associated with the Scheme during its construction, operation and maintenance, and decommissioning phases. A **Framework SSCEP [APP-204]** has been prepared and includes measures to maximise and pro-actively expand the economic benefits of the Scheme for the local community. The provision of a detailed SSCEP is secured via Requirement 16 of the **Draft DCO [APP-220]** and this must be in substantial accordance with the **Framework SSCEP [APP-204]**.
RR-041	Looking at the plans the proposed cable route and access road will be directly opposite my property. I understand that the build will involve HGV's to operate Monday to Friday and Saturday mornings during the build (sometimes during early mornings and into the evening). As this is a rural area with rural roads I am concerned with the increase in traffic creating both noise and CO2 pollution. Previously my next door neighbour was refused planning permission to build a manage to the rear of his property due to access from Moss Road not being suitable for any increase in traffic congestion. To that note may I ask how and why it is acceptable now to cause traffic congestion for this build? To conclude I would like to invite a representative from planning to come to my property to assess if the increase in traffic, noise and pollution is acceptable.	<u>Traffic, noise and pollution</u> The **Transport Assessment [APP-179]** and **Framework CTMP [APP-206, APP-207]** provide full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes measures such as suitable agreed Heavy Good Vehicle routes and timing restrictions, the use of traffic marshals at site accesses and crossing points, and the development of a communications strategy for those working on the Scheme. A detailed Construction Traffic Management Plan (which must substantially accord with the Framework CTMP) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**. As set out in **Volume I, Chapter 11: Noise and Vibration [APP-063]** and **Volume I, Chapter 13: Transport and Access [APP-066]** of the Environmental Statement, measures to minimise community disturbance from noise and traffic as a result of the Scheme are provided in the **Framework CEMP [APP-196],** the **Framework CTMP [APP-206, APP-207]**, and the **Framework OEMP [APP-197]**. Measures to mitigate transport, air quality and highway safety effects from increased traffic during construction are detailed in Section 13.6.6 of **Volume I Chapter 13: Transport and Access [APP-065]**. Some measures include (but are not limited to): vehicles using the most direct route to and from the Solar PV Site, vehicles using 'higher' order roads such as A and B classified Roads, promotion of car sharing and implementation of shuttle bus transfers to reduce trips. These measures will ensure so far as possible that the Scheme does not adversely impact on the local highway network or local air quality through increased transport emissions. Access to the Solar PV Site for all vehicles will be via Fenwick Common Lane/Haggs Lane or the access directly from Moss Road. All vehicles will approach from the west through Askern from the A19, which has been considered the most appropriate route for traffic, as access from the east has been discounted due to access constraints.
RR-042	I would like to express my thoughts in regards to the proposed plans for the Fenwick Farm, and that I am in support of the project. As a resident of the village, I believe that the project will be beneficial to the environment and the future of our electricity supply. I have no concerns with this project taking place.	The Applicant notes this comment.
RR-043	The project will have a big impact on my place of work as we run artic lorries from our yard in Moss directly across from the planned site entrance. The lorries come to and from the yard multiple times a day 7 days a week. Any delay to the movments of the trucks will have detrimental effects on deadlines and will risk relationships with clients. This is our only source	Details of traffic numbers associated with the scheme are provided within Section 6 of **Volume III, Appendix 13-4: Transport Assessment [APP-179]**. The Applicant has sought to limit the impact on the village of Moss by implementing a split access strategy which caters for the construction workforce and construction HGV

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	of income and cannot work remotley. The company had been here for 15 plus years and never had any issues in the past but this project will place a huge risk on the future of our business.	movements, which is detailed in Section 5.5 of **Volume III, Appendix 13-4: Transport Assessment [APP-179]**. The construction of the Scheme is anticipated to take approximately 2 years, during which the core construction working hours would be 7am–7pm Monday to Friday and 7am–1pm Saturdays. The majority (75%) of construction worker vehicles (predominantly small private cars) will access the Solar PV Site off Fenwick Common Lane/Haggs Lane using Access 5, which will act as a one way access, and will exit onto Moss Road via Access 1. The Applicant anticipates that approximately 100 construction worker vehicles will egress from Access 1 onto Moss Road and travel westbound through the village of Moss in the PM peak construction hour (7pm–8pm). For construction HGV movements, access and egress from the Solar PV Site will be via Access 1. HGV movements are not permitted to use Access 5 off Fenwick Common Lane and Haggs Lane as the junction of Moss Road and Fenwick Common Lane is too small. **Volume III, Appendix 13-4: Transport Assessment [APP-179]** estimates that up to 36 two-way HGV movements per day would pass along Moss Road enroute to using Access Point 1. These numbers are during the peak of construction and have been assessed to show a worst-case scenario – meaning there are unlikely to be this many movements through the entire construction phase. For the installation of the grid connection corridor, there will be a haul road constructed between Access 2 on Moss Road and Access 3 on Trumfleet Lane. This will enable construction traffic to travel to the southeast of the village without using local roads within the village of Moss. It is assumed in **Volume III, Appendix 13-4: Transport Assessment [APP-179]** that up to 6 two-way HGV movements will utilise this haul road between Access 2 and 3. This haul road will be removed following the completion of the grid connection corridor construction works. The **Framework CTMP [APP-206, APP-207]** provides details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. Where works to the Local Highways to facilitate the construction of the grid connection corridor will require traffic management to be installed, this would be for a limited time period and through traffic would be maintained under partial lane closures. Details of all construction traffic activities are included within the **Framework CTMP [APP-206, APP-207]**, with Temporary Traffic Management arrangements outlined between Paragraphs 5.2.4 and 5.2.8. Where works to the Local Highways to facilitate the construction of the grid connection corridor will require traffic management to be installed, this would be for a limited time period and through traffic would be maintained under partial lane closures. Details of all construction traffic activities are included within the **Framework CTMP [APP-206, APP-207]**. Temporary Traffic Management arrangements are included between Paragraphs 5.2.4 and 5.2.8.
RR-044	I do not see the benefits of placing solar panels on agricultural land. In the United kingdom when energy is needed the most the solar panels are at there most inefficient. Surely it makes more sense to use a small modular reactors in place of solar These produce around 500m/w on a base of approximately 20 hectares, giving 60 years of constant energy	<u>Efficiency</u> The Government has identified through its energy policy, most recently in NPS EN-1 and the NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-246]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need.

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	Solar is not only a hazard to the eco system but the loss of farm land which soaks up co2 will be lost. I believe a proper review is required regarding putting solar on agricultural land	Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme. As explained in the **Statement of Need [APP-192]** solar power generation has global momentum, and various large-scale schemes are being developed in the UK. Solar is a proven technology. It is already delivering as part of the UK's electricity system and will continue to deliver further critical benefits to consumers through the urgent and continued decarbonisation, security of supply and affordability. Solar power generation has undergone significant technological advances in scale and commercial efficiency and solar panel efficiency is expected to continue improving over the course of the 2020s. It is therefore important to make best use of this natural, renewable energy resource to meet the UK's legal carbon emission reduction obligations. NPS EN-1 at Paragraph 3.3.20 recognises that Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply. The Scheme design retains flexibility to allow for the selection of the most efficient solar technology at the time of construction. Solar generation technology is developing at a fast pace, with better, more efficient and more cost-effective Solar PV Panels coming to the market. The Applicant is therefore seeking to retain the flexibility to choose the precise technology close to the point of the construction of the Scheme. This will enable the optimum production of renewable energy and subsequently reduce cost for the end user. The final technology installed will be required to remain within the parameters defined by the **Works Plan [APP-214]** and **Outline Design Parameters Statement [APP-193]**. <u>Loss of agricultural land</u> In identifying areas that could be suitable for a Solar PV Site the Applicant considered locations that would avoid BMV agricultural land. As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** of the Environmental Statement, an agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV land. Due to the small scale of this BMV land, it is not currently farmed for high-quality agricultural food production and was recently used for biomass crops. With the exception of a relatively small area of BMV land proposed for structural planting, impacts on this BMV land will be temporary and reversible. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**. An increase in soil organic matter content may occur during the lifetime of the Solar PV Site. In addition, the removal of tillage during the operation and maintenance phase will lead to improved soil function and increased carbon sequestration during the lifetime of the Solar PV Site. Prior to the start of construction, a detailed Soil Management Plan will be submitted to and approved by the local authority (as outlined in the **Framework CEMP [APP-196]** and secured by Requirement 15 of Schedule 2 to the **Draft DCO [APP-220]**). This will ensure soils are not degraded and farming activities can re-commence following completion of the

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		construction phase along the Grid Connection Corridor and decommissioning phase within the Solar PV Site. Impact on the ecosystem **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. As detailed in the **BNG Assessment [APP-200]**, the Scheme is predicted to exceed the BNG target of 10% and this is predicted for each habitat type. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types as secured by the **Framework LEMP [APP-202]** and requirement 6 in Schedule 2 in the **Draft DCO [APP-220].** Impacts on soil carbon storage **Volume I, Chapter 6: Climate Change [APP-058]** presents the assessment of the likely significant effects on the climate as a result of the proposed Scheme. The chapter sets out that as with other solar farm schemes, land use change is anticipated to have a beneficial impact in terms of GHG emissions during the lifetime of the Scheme with the **Framework SMP [APP-199]** and **Framework LEMP [APP-203]** securing mitigation measures to protect species, reinstate soil resources and manage BNG. This is due the removal of tillage during the operation and maintenance phase leading to improved soil function and increased carbon sequestration during the lifetime of the Solar PV Site. However, as this beneficial impact has been assumed to reverse during decommissioning provided the Solar PV Site is utilised for farming again, the GHG impact associated with land use change has therefore been excluded from the lifecycle GHG impact assessment. This is assumed to represent a robust worst-case scenario as trees and hedges planted prior to or during construction will be retained throughout decommissioning.
RR-045	Loss of farmland, loss of wildlife habitat in. Noise pollution disruption of walking footpaths. Unacceptable level of heavy transport through unsuitable road access. Increase in traffic delays due to 2 level crossing areas. Safety considerations for junior school en route. Loss of local business due to lack of visitors to rural area with rural views. Government misleading local residents regarding £300 per year decrease in electricity prices. Unsightly solar panels. On going disruption due to lifespan of panels.	Loss of agricultural land In identifying areas that could be suitable for a Solar PV Site the Applicant considered locations that would avoid BMV agricultural land. As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** of the Environmental Statement, an agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV land. Due to the small scale of this BMV land, it is not currently farmed for high-quality agricultural food production and was recently used for biomass crops. With the exception of a relatively small area of BMV land proposed for structural planting, impacts on this BMV land will be temporary and reversible. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural activities to

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		continue on the surface. Further information can be found in the **Framework SMP [APP-199]**. <u>Loss of wildlife</u> **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. As detailed in the **BNG Assessment [APP-200]**, the Scheme is predicted to exceed the BNG target of 10% and this is predicted for each habitat type. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types as secured by the **Framework LEMP [APP-202]** and requirement 6 in Schedule 2 in the **Draft DCO [APP-220].** <u>Noise pollution</u> An assessment of noise impacts from equipment, such as transformers and inverters, on residential receptors is presented in **Volume I, Chapter 11: Noise and Vibration [APP-063]** of the Environmental Statement. With proposed mitigation measures in place, noise from equipment is not considered to be significant and is likely to be less than ambient noise levels. Working hours are set out in the **Framework CEMP [APP-196]** with the use of high noise generating plant limited to the hours between 08:00 and 18:00 from Monday to Friday and between 08:00 and 13:00 on Saturday. There will be no works undertaken on Sundays or Bank Holidays unless crucial to construction (for example HDD which must be a continuous activity) or in an emergency. <u>Public Rights of Way</u> The Applicant notes the concerns of residents of any interaction of construction workers and PRoW users. **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** and **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** of the Environmental Statement assesses the effects of the Scheme on PRoW in terms of impacts to views for users views of and disruption to users which may be caused by any diversions, respectively. The Applicant has selected access locations for construction vehicles to minimise any interactions with PRoW and will ensure that robust procedures are put in place to ensure the safety of PRoW users and these are set out in the **Framework PRoWMP [APP-202]** and **Framework CTMP [APP-206, APP-207]**. Detailed management plans will need to be approved post consent, and prior to construction, by City of Doncaster Council. These detailed management plans must substantially accord with the framework management plans, meaning the Applicant must implement mitigation which has been promised, and are secured by Requirements 11 to 13 and Requirement 17 in Schedule 2 to the **Draft DCO [APP-220]**. The Applicant will maintain PRoW connectivity during the construction of the Solar PV Site and Grid Connection Corridor. Any PRoW to be temporarily closed will have a suitable localised diversion in place to allow continued use by the local community, as set out in the

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		Framework PRoWMP [APP-202]. A detailed management plan must substantially accord with the framework management plan, meaning the Applicant must implement mitigation which has been promised, and are secured by Requirements 17 in Schedule 2 to the **Draft DCO [APP-220]**. During the operation of the Scheme, the existing PRoW passing through or running adjacent to the Order limits are expected to be unaffected, aside from Sykehouse 29, Moss 6 and Fenwick 14 that will be permanently diverted. The permanent diversions of these PRoW would increase their journey length by minimal distances (less than 50 m) and no significant effects on PRoW users are therefore anticipated. **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** recognises that there will be impacts on some views from PRoW during the construction, operation and maintenance, and decommissioning phases of the Scheme. Where the potential for adverse visual effects has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Buffers between PRoW and perimeter fencing have also been included in the design, with fencing being installed a minimum distance of 20 m either side of the centre of the PRoW where solar infrastructure lies to both sides (creating a 40 m wide corridor between the fence lines), or 15 m from the PRoW centreline if solar infrastructure is to one side only. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A. <u>Traffic</u> A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within **Volume I, Chapter 13: Transport and Access [APP-065]** of the Environmental Statement. Traffic during the operation and maintenance phase would be minimal. The **Transport Assessment [APP-179]** and **Framework CTMP [APP-206, APP-207]** provide full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes measures such as suitable agreed Heavy Good Vehicle routes and timing restrictions, the use of traffic marshals at site accesses and crossing points, and the development of a communications strategy for those working on the Scheme. A detailed Construction Traffic Management Plan (which must substantially accord with the **Framework CTMP [APP-206, APP-207]**) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**. The majority of construction staff and HGV vehicle movements are expected to occur outside of the traditional school arrival and departure times through Askern (e.g. 08:00-09:00 and 15:00-16:00). For example, staff movements are expected between 06:00-07:00 in the AM and between 19:00-20:00 in the PM. HGVs are expected to move between 09:00-17:00, therefore it is possible that some movements could occur along Moss Road in Askern during the PM school pick up period. During the 15:00-16:00 period a total of 4 two-way HGVs are expected through Askern. These movements would be managed through the detailed CTMP. The **Framework CTMP [APP-206, APP-207]** outlines the specific vehicle routing requirements during construction. The report highlights that both the Askern and Moss rail level crossings would need to be used to enable access to the Solar PV Site. The **Framework CTMP [APP-206, APP-207]** also sets out measures to minimise the impacts and disturbance caused by construction traffic on the local and strategic road network. This

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		includes a description of measures to be introduced to minimise impacts associated with traffic using the level crossings. The Applicant does not propose to affect the operation of the level crossing either through use as part of construction routes or through any proposed temporary traffic management. Where staff or delivery traffic uses the level crossing, drivers will comply with the operation of the level crossing, rather than affecting the operation of the crossing itself. Loss of local businesses **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226] i**dentifies socio economic benefits of the Scheme through the generation of 225 total net jobs per annum and an estimated generation of £12.6 million per year to the national economy during the construction phase, of which £5.7 million would be of benefit to the local area within 60-minute driving time of the Scheme. The chapter also concludes that there are no likely significant adverse socio-economic effects associated with the Scheme during its construction, operation and maintenance, and decommissioning phases. A **Framework SSCEP [APP-204]** has been prepared and includes measures to maximise and pro-actively expand the economic benefits of the Scheme for the local community. The provision of a detailed SSCEP is secured via requirement 16 of the **Draft DCO [APP-220]** and this must be in substantial accordance with the **Framework SSCEP [APP-204]**. Unsightly solar panels The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and wide-ranging stakeholder engagement. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable. As set out in the **Design and Access Statement [APP-191]**, design principles have guided, and will continue to guide, the Scheme from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures. The Landscape and Visual Impact Assessment in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** recognises that there will be impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme. Whilst impacts will remain at year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting. Where the potential for adverse visual effects has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A. Ongoing disruption due to lifespan of panels The design life of the key components of the Scheme, including the Solar PV Panels, are set out in Table 2-3 of **Volume I, Chapter 2: The Scheme [APP-054]** of the Environmental Statement. This outlines how many times these components may need to be replaced, during the operational lifetime of the Scheme. This commits that there will be no wholesale replacement of Solar PV Panels, although replacement of any individual faulty or damaged individual Solar PV Panels will occur as part of normal maintenance of the Scheme.

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		When equipment needs replacement or maintenance, measures to minimise community disturbance from noise, lighting and traffic and minimise impacts on visual amenity as a result of the Scheme are provided in the **Framework OEMP [APP-197]**.
RR-046	This project will be built in the wrong place, covering arable land that can be used to produce food that is required for our country. This company is only building it on this land because they are only interested in their profit margins and not the community it will effect.	The Solar PV Site has been chosen through a thorough site selection process which is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement and assessed against relevant planning policy in the **Planning Statement [APP-246]**. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable. The Applicant is committed to establishing a Community Benefit Funds (CBFs). CBFs are designed to provide additional support and tangible benefits to local communities impacted by large infrastructure projects. They are voluntary commitments by developers to enhance the local area. The terms of reference will be discussed and agreed with a community liaison group. The exact details of the administration of the fund will be developed together with residents' representatives. CBFs are not considered in the overall planning balance when the Planning Inspectorate makes a recommendation or the Secretary of State grants consent, meaning the Examining Authority must still be satisfied the Scheme is appropriate even without the CBF in place.
RR-046	The build of this solar farm will bring extra traffic through our village down moss road spilling out fumes from the lorries bring in the equipment that will be used to build the solar farm.	A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within **Volume I, Chapter 13: Transport and Access [APP-065]** of the Environmental Statement. Traffic during the operation and maintenance phase would be minimal. The **Transport Assessment [APP-179]** and **Framework CTMP [APP-206, APP-207]** provide full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes measures such as suitable agreed Heavy Good Vehicle routes and timing restrictions, the use of traffic marshals at site accesses and crossing points, and the development of a communications strategy for those working on the Scheme. A detailed Construction Traffic Management Plan (which must substantially accord with the Framework CTMP) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**. Measures to mitigate transport, air quality and highway safety effects from increased traffic during construction are detailed in Section 13.6.6 of **Volume I Chapter 13: Transport and Access [APP-065]** of the Environmental Statement. Some measures include (but are not limited to): vehicles using the most direct route to and from the Solar PV Site, vehicles using 'higher' order roads such as A and B classified Roads, promotion of car sharing and implementation of shuttle bus transfers to reduce trips. These measures will ensure so far as possible that the Scheme does not adversely impact on the local highway network or local air quality through increased transport emissions.
RR-046	These poisonous deadly fumes will effect our children at moss road school and people walking in the village.	As discussed in Paragraph 14.2.22 to 14.2.24 in **Volume I, Chapter 14: Other Environmental Topics [APP-066]**, construction phase traffic has been modelled and compared against the relevant screening criteria. As construction phase road traffic volumes are not expected to meet the thresholds above for which detailed modelling is required, there are no likely significant air quality impacts from traffic predicted during the construction phase. Paragraph 14.2.20 of **Volume I, Chapter 14: Other Environmental Topics [APP-066]** confirms that, due to the nature of the Scheme, a significant change to traffic flows is not

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		anticipated to occur during the operation and maintenance phase of the Scheme, meaning there are no likely significant air quality impacts predicted during operation and maintenance.
RR-046	Extra traffic will make it more dangerous for our young and old people walking on moss road and the A19. The roads are on a terrible condition at present full of pot holes, this will make it even worse and cause more damaged to vehicles and other road users, such as motorbikes and cyclists.	As shown in Table 6 within the **Transport Assessment [APP-179]**, the large majority of traffic movements will be associated with staff vehicles between the periods of 06:00-07:00 and 19:00-20:00. This is in conjunction with shift start and end times. Traffic movements during other periods of the working day (e.g. 09:00-17:00) will be restricted to HGV movements, where a maximum of 6 additional two-way movements per hour can be expected on Moss Road. This number is associated with the peak of construction and would not be evident throughout the entirety of the construction phase, which in itself is a temporary effect. **Volume I, Chapter 13: Transport and Access [APP-065]** includes a comprehensive assessment of the impact of construction traffic. 13.7.29 onwards sets out the assessment in terms of road safety. Table 13-24 shows that the magnitude of safety impact of the scheme would be very low. This is not a significant impact. The **Framework CTMP [APP-206, APP-207]** provides details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes management measures and controls that will be included to ensure the safety of pedestrians and cyclists on construction access routes and at site access locations. Pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant Local Highway Authority, as referenced in Section 5.2 of the **Framework CTMP [APP-206, APP-207].** Where these surveys identify upgrades needed to undertake the construction of the Scheme, or following the construction phase then these works will be undertaken.
RR-046	The devastation to wildlife and our local environment will be greatly increased.	**Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. As detailed in the **BNG Assessment [APP-200]**, the Scheme is predicted to exceed the BNG target of 10% and this is predicted for each habitat type. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types as secured by the **Framework LEMP [APP-202]** and requirement 6 in Schedule 2 in the **Draft DCO [APP-220].**
RR-046	Solar farms need to be built on none green belt sites there are many brown belts sites in the area that this site could be built on. These brown belt sites should be explored more closely before this site is used.	The Government has identified through its energy policy, most recently in NPS EN-1 and the NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. The **Statement of Need [APP-192]** also notes that, whilst decentralised generation has an important role to play in decarbonisation, 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. Therefore, smaller scale solar, including rooftop solar, must be

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		considered as additional to, as opposed to instead of, the need for large-scale, ground-mounted solar like this Scheme. **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** explains how the Applicant has undertaken site selection and design in a proportionate way, in accordance with Paragraphs 2.10.19 to 2.10.48 of NPS EN-3. Areas of land within the Green Belt were avoided (broadly comprising the western half of the administrative area of the City of Doncaster), as shown on **Volume II, Figure 3-4: Environmental and Planning Constraints [APP-079]**. Brownfield land was considered for the Scheme following a review of the local authority brownfield land register. However, it was concluded that there was no available or suitable brownfield land for the Scheme as it would compete or be in conflict with local planning policy seeking to deliver housing and mixed-use developments, and the land next to the Existing National Grid Thorpe Marsh Substation was being developed for another energy project. This is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]**.
RR-046	I have loved on this village over (Redacted) years and this solar farm will devastate this village and surrounding areas. Wildlife will be greatly effected	<u>Loss of wildlife</u> **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. As detailed in the **BNG Assessment [APP-200]**, the Scheme is predicted to exceed the BNG target of 10% and this is predicted for each habitat type. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types as secured by the **Framework LEMP [APP-202]** and requirement 6 in Schedule 2 in the **Draft DCO [APP-220].**
RR-047	Major concerns over increased HGV traffic through the village of Moss. Current speed limit 40mph along with road conditions (potholes/subsistence) and high numbers of concealed entrance driveways and no footpaths through the village makes this a higher risk for serious accidents. My property is (Redacted) and the speed of HGV's along with the road surface already sends tremors through my property as they pass at 40mph+ I also have a concern if HGV traffic dramatically increases the possibility of structural damage to my property.	Details of traffic numbers associated with the scheme are provided within Section 6 of **Volume III, Appendix 13-4 Transport Assessment [APP-179].** HGV traffic movements will be restricted to moving between 09:00-17:00 on a normal working day, where a maximum of 6 additional two-way movements per hour can be expected on Moss Road. This number is associated with the peak of construction and would not be evident throughout the entirety of the construction phase, which in itself is a temporary effect. **Volume I, Chapter 13 Transport and Access [APP-065]** includes a comprehensive assessment of the impact of construction traffic. 13.7.29 onwards sets out the assessment in terms of road safety. Table 13-24 shows that the magnitude of safety impact of the scheme would be very low. This is not a significant impact. The **Framework CTMP [APP-206, APP-207]** provides details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes management measures and controls, such as the introduction of a Traffic Management Monitoring System (TMMS), which will enable monitoring of compliance with HGV routing and timing restrictions. Pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant Local Highway Authority, as referenced in Section 5.2 of the

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		Framework CTMP [APP-206, APP-207]. Where these surveys identify upgrades needed to undertake the construction of the Scheme, or following the construction phase then these works will be undertaken. An assessment of construction traffic vibration was scoped out of **Volume I, Chapter 11: Noise and Vibration [APP-063]** as construction traffic would not generate higher levels of vibration than existing HGV movements. Vibration is assessed based on human disturbance, which is substantially lower than the level of vibration that would result in cosmetic damage to structures. To put this into context, British Standard 5228-2:2009+A1:2014 states that the probability of damage to a building tends towards zero at a Peak Particle Velocity (PPV) of 12.5 mm/s (Section F.5), whereas a PPV of 10 mm/s would be 'intolerable' for a person (Table B.1). As such, cosmetic damage is only likely to occur at a level of vibration that is 'intolerable' and is unlikely to occur from HGV movements.
RR-048	I have great concerns regarding this project. This is a small rural village with small lanes and roads. These are already in a poor state with many potholes and worn away surfaces. They are not suitable for the heavy traffic that will be used for this project. The noise and disturbance the extra traffic will cause along with the noise and disruption from the setting up of this site.	A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within **Volume I, Chapter 13: Transport and Access [APP-065]**. Traffic during the operation and maintenance phase would be minimal. The **Transport Assessment [APP-179]** and **Framework CTMP [APP-206, APP-207]** provide full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes measures such as suitable agreed Heavy Good Vehicle routes and timing restrictions, the use of traffic marshals at site accesses and crossing points, and the development of a communications strategy for those working on the Scheme. A detailed Construction Traffic Management Plan (which must substantially accord with the Framework CTMP) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220** Consideration has been given to traffic routing, timing, and access points to the Scheme to minimise noise impacts at existing receptors as detailed in **Volume I, Chapter 11: Noise and Vibration [APP-063].** Table 11-14 of Chapter 11 presents the results of the construction noise assessment and identifies that there would be no material change in noise levels due to construction traffic. In addition, pre and post construction road condition surveys will be undertaken at identified locations in coordination with the relevant Local Highway Authority, as referenced in Section 5.2 of the **Framework CTMP [APP-206, APP-207].** Where these surveys identify upgrades needed to undertake the construction of the Scheme, or following the construction phase then these works will be undertaken.
RR-048	The loss of wildlife this will cause will have a big impact on our little village. This is not a suitable site for a solar farm. This is the country. The villagers live here to enjoy the fields/views/wildlife. Not to look at a solar farm. The countryside walks we all are accustomed to will be spoilt. We don't want to walk amongst a solar farm. This belongs in an industrial area that is already built up.	<u>Loss of wildlife</u> **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**.

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		As detailed in the **BNG Assessment [APP-200]**, the Scheme is predicted to exceed the BNG target of 10% and this is predicted for each habitat type. The Applicant therefore commits to achieving a minimum 10% BNG for all habitat types as secured by the **Framework LEMP [APP-202]** and requirement 6 in Schedule 2 in the **Draft DCO [APP-220].** PRoW The Applicant notes the concerns of residents of any interaction of construction workers and PRoW users. The Applicant has selected access locations for construction vehicles to minimise any interactions with PRoW and will ensure that robust procedures are put in place to ensure the safety of PRoW users and these are set out in the **Framework PRoWMP [APP-202]** and **Framework CTMP [APP-206, APP-207]**. Detailed management plans will need to be approved post consent, and prior to construction, by City of Doncaster Council. These detailed management plans must substantially accord with the framework management plans, meaning the Applicant must implement mitigation which has been promised, and are secured by Requirements 11 to 13 and Requirement 17 in Schedule 2 to the **Draft DCO [APP-220]**. During the operation of the Scheme, the existing PRoW passing through or running adjacent to the Order limits are expected to be unaffected, aside from Sykehouse 29, Moss 6 and Fenwick 14 that will be permanently diverted. The permanent diversions of these PRoW would increase their journey length by minimal distances (less than 50 m) and no significant effects on PRoW users are therefore anticipated. **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** recognises that there will be impacts on some views from PRoW during the construction, operation and maintenance, and decommissioning phases of the Scheme. Where the potential for adverse visual effects has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Buffers between PRoW and perimeter fencing have also been included in the design, with fencing being installed a minimum distance of 20 m either side of the centre of the PRoW where solar infrastructure lies to both sides (creating a 40 m wide corridor between the fence lines), or 15 m from the PRoW centreline if solar infrastructure is to one side only. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, as well as on the Indicative Landscape Masterplan within Appendix A of this document. Landscape impacts The Landscape and Visual Impact Assessment in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** recognises that there will be landscape and visual impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme. Whilst some impacts will remain at year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting. Where the potential for adverse visual effects has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A.
RR-048	The fire risk of such a large site close to properties. Our properties will be devalued by this project and make them more difficult to sell in future.	The Applicant emphasises that the BESS Area was selected to accommodate a minimum buffer zone of 500 metres to any residential properties, which minimises any visual or noise

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	Looking at the future decommissioning of the site. How will disposing of all the panels be environmentally friendly?	impacts to receptors and ensures disruption to the local community is minimised if a BESS Container failure should occur. The **Framework BSMP [APP-205]** extensively documents how the probability of a BESS Container failure incident is minimised by the design and proposed operating procedures, and that if a failure occurs these ensure this will be limited to one BESS Container. The **Framework BSMP [APP-205]** sets out the controls in place to ensure that, in the unlikely event a fire did occur, any impacts arising from the fire (such as fumes, or water run off) will be managed so there are no impacts on local communities beyond the Order limits. The detailed design process will need to follow if the DCO is granted to ensure the Scheme can make best use of the latest technology and construction methods. Determining the solar panel provider will be one of the last decisions to be made when looking to place orders to deliver the Scheme. However, it is expected that the majority of the panel components will be recyclable and materials can be recovered and reused. <u>House prices</u> Impacts on property prices are not a material consideration in the NSIP planning process and therefore are not a factor to be considered by the Secretary of State when determining the application for development consent. The Applicant will comply with the Compensation Code in respect of any compulsory acquisition associated with the Scheme, including any injurious affection or depreciation of land value in accordance with the relevant statutory tests. The design life of the key components of the Scheme, including the Solar PV Panels, are set out in Table 2-3 of **Volume I, Chapter 2: The Scheme [APP-054]**. This outlines how many times these components may need to be replaced, during the operational lifetime of the Scheme. This commits that there will be no wholesale replacement of Solar PV Panels, although replacement of any individual faulty or damaged individual Solar PV Panels will occur as part of normal maintenance of the Scheme.
RR-050	Fenwick Solar Farm This project will totally transform the rural, village environment into an industrial power generation and storage facility. The extent of it will overwhelm nearby villages totally changing the environment. It will totally change village life during the construction, 2 to 3 years but also during operation for the next 40 years plus,due to increased traffic on unsuitable road and noise during construction work. This will have a significant detrimental impact on rural activities such as horse riding and will sinificantly increase the risk of this activity. Whilst the risk assessment attempts to address these issues it will not eliminate the inherent risk. The use of the countryside and farm land for this purpose will only exacerbate our ability to grow our own food and increase dependancies on other countries, which in times of uncertainty will increase prices. People spend more on food than they do on energy. There are better ways to install solar eg on existing and new buildings rather than using farm land.	<u>Landscape impacts</u> The Landscape and Visual Impact Assessment in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** recognises that there will be landscape and visual impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme. Whilst some impacts will remain at year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting. Where the potential for adverse visual effects has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A. <u>Construction</u> As described in **Volume I, Chapter 2: The Scheme [APP-054]** of the Environmental Statement, subject to being granted development consent and following a final investment decision, currently the earliest construction could start is in 2028. Construction of the Solar PV Site and Grid Connection Cables is anticipated to start in tandem. The Grid Connection Cables would require approximately 12 months, and the construction of the Solar PV Site would require an estimated 24 months, with the operation and maintenance phase anticipated to commence in 2030. The construction phase could be of longer duration however these timings have been used within the Environmental Statement as a worst-case

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		assumption for the technical assessments presented in **Volume I, Chapter 6 to 14 [APP-058 to APP-066]** of the Environmental Statement, as it is assumed activity in a shorter construction phase would be more condensed and intensive, and therefore have greater effects. The technical chapters each provide clarification on the assumptions used for the construction phase. Measure to mitigate the impact of construction are set out in **Framework CEMP [APP-196]** and secured by Requirement 15 of Schedule 2 to the **Draft DCO [APP-220]**). During operation, the predicted traffic and noise levels will be significantly lower than during construction and decommissioning and therefore operational effects are therefore expected to be not significant. <u>Loss of agricultural Land</u> In identifying areas that could be suitable for a Solar PV Site the Applicant considered locations that would avoid BMV agricultural land. An agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV land. Due to the small scale of this BMV land, it is not currently farmed for high-quality agricultural food production and was recently used for biomass crops. With the exception of a relatively small area of BMV land proposed for structural planting, impacts on this BMV land will be temporary and reversible. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**. <u>Alternatives</u> The Government has identified through its energy policy, most recently in the NPS EN-1 and NPS EN-3), that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. The **Statement of Need [APP-192]** also notes that, whilst decentralised generation has an important role to play in decarbonisation, 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. Therefore, smaller scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, the need for large-scale, ground-mounted solar like this Scheme. Brownfield land was considered for the Scheme following a review of the local authority brownfield land register. However, it was concluded that there was no available or suitable brownfield land for the Scheme as it would compete or be in conflict with local planning policy seeking to deliver housing and mixed-use developments, and the land next to the Existing National Grid Thorpe Marsh Substation was being developed for another energy project. This is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement.
RR-051	In brief I have some major concerns about the location and in size of the proposed solar plant, battery storage, substation and related infrastructure, which has a land uptake of almost 70 % of the Fenwick parish.	<u>Site selection and site scale</u> The Government has identified through its energy policy, most recently in the NPS EN-1 and the NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy

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	The huge impact it will have on the environment , wildlife, the local community and the wider population whilst in construction and for the public who live there and use the public access areas such as footpaths and bridleways for the next at least 40 years. A proposal of the size and scale has never been part of the community or local plan, this is not just a few solar panels this is a power plant with storage and sub station to facilitate not only the scheme but allow whichever company may own it to use the battery storage as a means to buy and sell electricity for profit and not purely for the storage of energy produced by the solar panels.	generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. The BESS system will have the ability to store electricity generated from the Scheme and/or import energy from the grid at times of excess generation, discharging the stored energy at times of peak demand and assisting in balancing UK's electricity supplies. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme. The Solar PV Site has been chosen through a thorough site selection process which is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement and assessed against relevant planning policy in the **Planning Statement [APP-246]**. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and wide-ranging stakeholder engagement. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable. As set out in the **Design and Access Statement [APP-191]**, design principles have guided, and will continue to guide, the Scheme from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures. Impact on the Environment wildlife and Local community As set out in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062], Volume I, Chapter 11: Noise and Vibration [APP-063]and Volume I, Chapter 13: Transport and Access [APP-066]** measures to minimise community disturbance from impacts such as noise, traffic and visual amenity as a result of the Scheme are provided in the **Framework CEMP [APP-196], Framework CTMP [APP-206, APP-207]**, and **Framework OEMP [APP-197]**. Detailed management plans will need to be approved post consent, and prior to construction, by City of Doncaster Council. These detailed management plans must substantially accord with the framework management plans, meaning the Applicant must implement mitigation which has been promised, and are secured by Requirements 11 to 13 in Schedule 2 to the **Draft DCO [APP-220]**. **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**.
RR-051	The need for additional battery storage linked to Thorpe Marsh (the point the proposal will join the grid) should also be questioned as there is a proposal for battery storage at Thorpe	The BESS Area has a direct relationship with the Solar PV Site and will support its operation by storing electricity produced during times of peak capacity until it needs to be released.

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	marsh. The Thorpe Marsh battery storage project could store up to 2.9GWhrs of energy, enough to supply around 340,000 households with electricity for one day which put into context can supply more than around 200,000 more homes than in the whole of Doncaster borough I also don't believe that proposals of this scale should be decided prior to NESO report has been produced and a national strategy for storage and generation is in place.	This increases the efficiency of the Solar PV Site as a renewable energy project aiding both its operation as a generating station and the export of electricity to the National Electricity Transmission System. The need to have flexibility and integrated technologies, such as BESS, is recognised by the Overarching National Policy Statement for Energy (Paragraphs 3.3.5 and 3.3.6). In addition, Paragraph 2.10.10 of the National Policy Statement for Renewable Energy provides policy support for schemes that include co-located solar and storage technologies because both technologies are needed and co-location maximises the efficiency of land use. In addition, the BESS system will provide the ability to import energy from the national grid at times of excess electricity generation, discharging the stored energy at times of peak demand and assisting in balancing the UK's electricity supplies. The BESS Area component of both the Scheme and the battery storage facility identified for Thorpe Marsh are part of the response to the need to store renewable power generated during periods of oversupply of renewable electricity, which is then released when there is insufficient supply of renewable generation (such as when there is less sunshine). Therefore, the projects are complementary in that they will help ensure reliable and stable electricity grid operation at times of peak demand, thus helping to improve the UK's energy security over the long term. The Government has identified through its energy policy, most recently in the EN-1 and EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]**and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme.
RR-053	Very deep concerns about the level of superficiality around the consultation. Clearly appears to be a box ticking exercise. This is exacerbated by the governments determination to introduce Renewable Energy at any cost. The combination is dangerous and is will inevitably lead to poor decision making The community is not being represented fairly by his MP, who by his own admission has stated that if we need to challenge this, he is not the right person to do so. This has created an inequity in the decision making process given his determination to push Solar Farms through, which is a matter of record. There is a huge conflict of interest (which can't be resolved by handing over the decision making process to another individual as I believe he has already influenced the process)	The Applicant considers the consultation carried out for the Scheme was robust and meaningful. The Applicant carried out three rounds of consultation during the pre-application period ahead of finalising its proposals for the Scheme. The Applicant also encouraged contact with the project team during the statutory and targeted consultations via email, freephone and Freepost to answer any queries or questions which were not answered at consultation events or covered within the consultation material. Full details on the consultation process are set out within the **Consultation Report [APP-022].** An independent and impartial Examining Authority has been appointed by the Planning Inspectorate to gather evidence and test information during the Examination of the application, including from interested parties should they express a wish to engage in the Examination process. The Applicant's design team has worked collaboratively to provide an integrated and responsive design appropriate for the local environment which has been informed by the process of environmental impact assessment, statutory consultation and wide-ranging stakeholder engagement. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable, as set out in the **Consultation Report [APP-022]** and summarised in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-063]**.
RR-053	The location of the battery storage is quite frankly ridiculous and bordering on inflammatory	The need to have flexibility and integrated technologies, such as BESS, is recognised by the NPS EN-1 (Paragraphs 3.3.5 and 3.3.6). In addition, Paragraph 2.10.10 of the NPS EN-3 provides policy support for schemes that include co-located solar and storage technologies because both technologies are needed and co-location maximises the efficiency of land use.

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		The **Statement of Need [APP-192]** discusses in more detail the need and benefits for the Battery Energy Storage System as part of the Scheme. The Statutory Consultation phase gave those interested in the Scheme an opportunity to comment on the proposals, whilst proving an opportunity for consultees to share their feedback on the changes made to the Scheme since non-statutory consultation. The changes presented at Statutory Consultation included refinement of the proposals for BESS Area so that they would be located in a single area within the Solar PV Site and at least 500 m from any residential property to ensure that there would be no significant noise or fire risks and to minimise visual impacts.
RR-053	Any level of compensation offered needs to be commensurate with the profit levels the stakeholders stand to make and the very serious losses that villagers will suffer (including tangible pecuniary loss and loss of amenity). It is simply not good enough to make vague reference to a compulsory purchase scheme.	The Applicant is committed to establishing a CBFs. CBFs are designed to provide additional support and tangible benefits to local communities impacted by large infrastructure projects. They are voluntary commitments by developers to enhance the local area. The terms of reference will be discussed and agreed with a community liaison group. The exact details of the administration of the fund will be developed together with residents' representatives. CBFs are not considered in the overall planning balance when the Planning Inspectorate makes a recommendation or the Secretary of State grants consent, meaning the Examining Authority must still be satisfied the Scheme is appropriate even without the CBF in place. As part of the statutory consultation process, the Applicant provided a statutory consultation feedback form which gave respondents an opportunity to provide feedback as to where a potential CBF would best be invested to provide the most impact to the local community. The statutory consultation form can be viewed at **Appendix L2: Statutory Consultation feedback form, Consultation Report Appendices [APP-023 to APP-051**]. The majority of responses from the feedback form were in favour of the fund being invested in causes relating to the environment (50%) and wildlife (52%). 32% of respondents opted to choose the free-text 'other' option when responding, citing causes such as youth causes, assisting low income residents and residents with disabilities with paying bills, the Burnet Heritage Trust, and several others. To view the responses that statutory consultees provided regarding use of a potential CBF in more detail, please see Figure 4-5 of the **Consultation Report [APP-022]**. The Applicant's decision to create a CBF, which is not a statutory requirement of the DCO process, would see the Applicant delegate the administration of the fund through a registered charitable organisation which specialises in community fund management. The charity would set up a board made up of local residents who would decide how the fund was allocated to best benefit the local community based on applications received by local residents. Exact details of uses of the fund cannot be confirmed at this stage, however suggestions submitted as part the consultation will be considered at the appropriate time.
RR-054	This rebarbative application is bordering on inflammatory, entirely disproportionate and I object to it in the strongest terms. So does my wife and (Redacted) children who will all be adversely impacted. It will destroy wildlife, natural beauty and adversely impact the environment. It will destroy a community and does not need to be in eye line of properties. The battery storage idea is preposterous. I reserve my position in full and will be providing detailed grounds of objection when appropriate.	<u>Impacts on Wildlife</u> **Volume I, Chapter 8: Ecology [APP-060]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work which confirms the ecological habitats and species likely to be affected by the Scheme. The Scheme avoids and mitigates all significant adverse effects on internationally, nationally and locally designated biodiversity sites and other important ecological features such as protected species and habitats, and veteran trees, during the construction, operation and maintenance, and decommissioning phases. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes

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		avoidance, buffers and mitigation measures that will be secured through management plan requirements included in Schedule 2 of the **Draft DCO [APP-220]**. Landscape The Landscape and Visual Impact Assessment in **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]** of the Environmental Statement recognises that there will be landscape and visual impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme. Whilst some impacts will remain at year 15 of operation, they will largely be screened or filtered by existing vegetation or proposed planting. Where the potential for adverse visual effects has been identified, landscape mitigation, including vegetative screening, has been embedded within the design of the Scheme to reduce these effects as far as possible. Proposed mitigation has been designed to integrate with the existing landscape character of the Solar PV Site. Details of the proposed landscape mitigation can be found within the **Framework LEMP [APP-203]**, which includes an Indicative Landscape Masterplan at Appendix A. Battery Energy Storage System The **Statement of Need [APP-192]** discusses the need and benefits for the Battery Energy Storage System as part of the Scheme.
RR-055	IMHO. The proposed Fenwick Solar farm project will not contribute to the energy crisis, only be a burden on the taxpayers. It will devastate the environment, considerably reduce food crops and grazing for cattle and horses . According to statistics these solar panels will need a massive amount of water as coolant . The construction of such a project will have serious consequences on our infrastructure of narrow lanes , the added heavy traffic will be an added affect on already extremely poorly maintained road surfaces, causing land slip and more potholes. Taking into consideration lack of sunny days, fog , snow , the cost to ratio to gained power it's unviable and not in the best interests of this area or Great Britain, definitely not in favour of we the people.	The Applicant notes that taxpayers will not contribute to the funding of the Scheme. Loss of agricultural Land In identifying areas that could be suitable for a Solar PV Site the Applicant considered locations that would avoid BMV agricultural land. As set out in **Volume I, Chapter 12: Socio-Economics and Land Use [APP-226]** of the Environmental Statement, an agricultural land survey was undertaken and categorised 7% of the Solar PV Site as BMV land. Due to the small scale of this BMV land, it is not currently farmed for high-quality agricultural food production and was recently used for biomass crops. With the exception of a relatively small area of BMV land proposed for structural planting, impacts on this BMV land will be temporary and reversible. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient depth to enable agricultural activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**. Traffic A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within **Volume I, Chapter 13: Transport and Access [APP-065]** of the Environmental Statement. Traffic during the operation and maintenance phase would be minimal. The **Transport Assessment [APP-179]** and **Framework CTMP [APP-206, APP-207]** provide full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes measures such as suitable agreed Heavy Good Vehicle routes and timing restrictions, the use of traffic marshals at site accesses and crossing points, and the development of a communications strategy for those working on the Scheme. A detailed Construction Traffic Management Plan (which must substantially accord with the Framework CTMP) will need to

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		be approved post consent prior to construction with the relevant local authorities and this is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**. Efficiency The Government has identified through its energy policy, most recently in the NPS EN-1 and NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme. As explained in the **Statement of Need [APP-192]** solar power generation has global momentum, and various large-scale schemes are being developed in the UK. Solar is a proven technology. It is already delivering as part of the UK's electricity system and will continue to deliver further critical benefits to consumers through the urgent and continued decarbonisation, security of supply and affordability. Solar power generation has undergone significant technological advances in scale and commercial efficiency and solar panel efficiency is expected to continue improving over the course of the 2020s. It is therefore important to make best use of this natural, renewable energy resource to meet the UK's legal carbon emission reduction obligations. NPS EN-1 at Paragraph 3.3.20 recognises that Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply. The Scheme design retains flexibility to allow for the selection of the most efficient solar technology at the time of construction. Solar generation technology is developing at a fast pace, with better, more efficient and more cost-effective Solar PV Panels coming to the market. The Applicant is therefore seeking to retain the flexibility to choose the precise technology close to the point of the construction of the Scheme. This will enable the optimum production of renewable energy and subsequently reduce cost for the end user. The final technology installed will be required to remain within the parameters defined by the **Works Plan [APP-214]** and **Outline Design Parameters Statement [APP-193]**.
AS-004	The inverters the transformers and the substation itself will all make noise. The area is already very quiet, there is no ambient sound to disguise the buzz of the fans or the hum of the inverters from the battery storage. The situation of the battery storage units are very close to homes and will have a negative impact particularly during the night.	The nearest residential property is approximately 500m from the BESS compound boundary. An assessment of operational noise effects from the Solar PV Site, BESS Area and On-Site Substation is provided in **Volume I, Chapter 11: Noise and Vibration [APP-063]**. The assessment considers the impact of noise at night, when background sound levels are lowest. The highest level of noise predicted from solar farm infrastructure (including the BESS Area and On-Site Substation are) at all of the identified sensitive receptors (Table 11-2 of **Volume I, Chapter 11: Noise and Vibration [APP-063]**) is 35 dB LAeq,T. This is a conservative prediction where plant is operating at full capacity and only likely to occur during hot days. This level of noise is equivalent to a whisper or the level of noise that you may experience in a library. The Scheme requires some flexibility in the masterplan layout and the type of noise generating plant that would be implemented in the final design; however, the Schedule 14 of the **Draft DCO [APP-220]** makes a commitment that evidence of compliance with the noise predictions in Table 11-7 of **Volume I, Chapter 11: Noise and Vibration [APP-063]** will need to be provided prior to any construction works commencing. As such, the level of operational noise at sensitive receptors would not be of sufficient magnitude to result in significant effects on health and quality of life.

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AS-004	The size of this solar farm in comparison to the village is huge, the circumference would take an hour to walk round. This is an imbalance to the semi rural environment. Apart from the farms themselves there is no heavy industry in the area and for some miles. In 2 years the area will change from tranquil to industrial.	The Government has identified through its energy policy, most recently in NPS EN-1 and the EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. Developing the Scheme at its proposed size and with its substantial benefits will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the Scheme. The Applicant's design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and wide-ranging stakeholder engagement. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable, as set out in the **Consultation Report [APP-022]** and summarised in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]**. As set out in the **Design and Access Statement [APP-191]**, design principles have guided, and will continue to guide, the Scheme from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures.
AS-004	I believe that the risk of flooding will be increased. The canal a couple of miles away floods on a regular basis despite flood defences surrounding it. The ground in this area is loam and clay and the substation and the battery storage on the land will increase the risk in this area which is already set to rise by 2040 from low risk to medium.	**Volume III, Appendix 9-3: Flood Risk Assessment [APP-158]** has been produced for the Scheme and considers risk both to, and arising from, the Solar PV Site and the Grid Connection Corridor. As part of the Flood Risk Assessment, mitigation is proposed to manage the potential impacts of flood risk so that the development does not increase or exacerbate flood risk to others. Solar PV Panels have been sequentially located to avoid areas of high fluvial flood risk and raised to a sufficient height to avoid floodwater. Field Stations have also been sequentially located to avoid high fluvial flood risk areas with one Field Station raised to a sufficient height to avoid floodwater. While some Solar PV Panels are located within Flood Zone 3, all Field Stations, the BESS Area, and On-Site Substation will be located outside of Flood Zone 3. This mitigation has been informed by site-specific hydraulic modelling which takes into account any increases in flooding due to climate change expected during the lifetime of the development. **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]** has also been produced which aims to manage surface water from the Scheme. This strategy incorporates Sustainable Drainage Systems to manage surface water from the Solar PV Site so that the Scheme remains safe throughout its lifetime and does not increase flood risk to others. The design aims to maintain greenfield runoff rates, mimicking the natural drainage conditions of the Solar PV Site, as far as possible, by allowing natural infiltration and limiting the potential for channelisation from rainfall dripping off the Solar PV Panels. New impermeable areas, such as the BESS Area and On-Site Substation, include filter drains leading to attenuation basins to manage drainage. A detailed drainage strategy must substantially accord with the **Volume III, Appendix 9-4: Framework Drainage Strategy [APP-160]**, meaning the Applicant must implement mitigation which has been promised, and are secured by Requirement 9 in Schedule 2 to the **Draft DCO [APP-220]**.
AS-004	The use of the phrase nimby is bandied about, usually as a way of shutting down an argument, it's used to invalidate justifiable concerns, as in 'I'm only objecting because it's on my doorstep.' However when is it acceptable to object? It's easy to be objective from a distance. Myself and my family support the green energy argument and thereby the energy security for the country. The majority of the people objecting to this application will support	The Solar PV Site has been chosen through a thorough site selection process which is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement and assessed against relevant planning policy in the **Planning Statement [APP-246]**. All comments received regarding the design of the Scheme have been considered by the Applicant and incorporated, where practicable. The Applicant

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	renewable energy but we are also trying to defend our village (and who else will defend it?) from inappropriate development which at this time is peaceful, green, wide open to animals, birds and plants. Taking this away to create an industrial park for the profit of a multinational company will directly impact the mental health of my family, friends living locally and the wider community.	recognises that the potential for future environmental changes associated with the Scheme during construction, operation and decommissioning is a source of acute 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 possible, in consultation with local stakeholders. Detailed work has been undertaken relating to potential effects including **Volume I, Chapter 10: Landscape and Visual Amenity [APP-062]**, **Volume I, Chapter 11: Noise and Vibration [APP-063]** and **Volume I, Chapter 13: Transport and Access [APP-065]** amongst other topics so that the potential for impacts is clearly set out. Design and mitigation measures have been incorporated where practicable to minimise these impacts which will be managed to acceptable levels through the suite of management plans proposed and secured via the requirements in Schedule 2 of the **Draft DCO [APP-220]**. The Applicant is committed to ongoing consultation with the community so that anxieties can be communicated and as far as possible addressed throughout all stages of the Scheme. A Community Liaison Group will be set up and is secured by Requirement 3 in Schedule 2 of the **Draft DCO [APP-220]**. A Community Liaison Officer (or alternative role) will be established to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the impacts of the Scheme. The implementation of Requirement 3 will allow feedback on impacts of the Scheme and mitigation measures to be considered and acted upon if required.
AS-004	There are so many more efficient energy alternatives than destroying this land for several generations by swathing it with solar panels. This is a huge irreversible decision to make and will have long term implications for agriculture in the area when government policy is to preserve agricultural land for food production. The rural development supplementary planning document ratified by Doncaster Council in April 24 categorises the area of Fenwick as part of countryside policy area and states that "care should be taken that proposals (for development) would not result in excessive expansion and encroachment of building development into the countryside". The argument for this would be that the panels are not permanent, however 40 years with an option to extend is considerably permanent in the scheme of land use	The Government has identified through its energy policy, most recently in the NPS EN-1 and the NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the Applicant's **Planning Statement [APP-246]** and **Statement of Need [APP-192]**, EN-1 and EN-3 identify large-scale solar energy generation, such as the Scheme, as being required to meet this need. The **Statement of Need [APP-192]** also notes that, whilst decentralised generation has an important role to play in decarbonisation, 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. Therefore, smaller scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, the need for large-scale, ground-mounted solar like this Scheme. Brownfield land was considered for the Scheme following a review of the local authority brownfield land register. However, it was concluded that there was no available or suitable brownfield land for the Scheme as it would compete or be in conflict with local planning policy seeking to deliver housing and mixed-use developments, and the land next to the Existing National Grid Thorpe Marsh Substation was being developed for another energy project. This is explained more fully in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement, including how the Applicant considered locations that would avoid BMV agricultural land. To identify these locations the Applicant used provisional ALC mapping published by Natural England. The results of this exercise are set out in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]** of the Environmental Statement. Within the Solar PV Site, fields currently used to grow arable crops (with some grazing) would cease to be part of a working farm during construction and operation, although there is potential for grazing by sheep for management of the grassland. The Grid Connection Corridor, if required, would also intersect a number of agricultural land holdings, but will be available for agricultural use again post construction, given cables will be buried at sufficient

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		depth to enable agricultural activities to continue on the surface. Further information can be found in the **Framework SMP [APP-199]**. Prior to the start of construction, a detailed Soil Management Plan will be submitted to and approved by the local authority (as outlined in the **Framework CEMP [APP-196]** and secured by Requirement 15 of Schedule 2 to the **Draft DCO [APP-220]**). This will ensure soils are not degraded and farming activities can re-commence following completion of the construction phase along the Grid Connection Corridor and decommissioning phase within the Solar PV Site. The operational life of the Scheme is 40 years, with decommissioning to commence 40 years after final commissioning (currently anticipated to be approximately 2030 to 2070). This is set out in the **Framework DEMP [APP-198]** which will be secured by Requirement 18 in Schedule 2 to the **Draft DCO [APP-220]**. At the end of the 40 years, the Solar PV Site will be decommissioned and the land fully reinstated as near as practicably possible to its former condition and land use. Some areas of habitat and biodiversity mitigation and enhancement may be left for species protection. Further details are set out in the **Framework DEMP [APP-198]**.
AS-004	Solar technology is not the most efficient renewable technology (11% output compared to 40% from a wind turbine.) The main advantage to using solar currently is that it's cheap but this is a long term process. The land is expensive to rent over the lifetime of the plan, the supporting infrastructure is costly to build and invasive and solar panel technology is rapidly developing with a likelihood that this will be outdated before the lifespan of the project. All of this suggests that for this project to be viable the costs will be passed on the consumers making this inefficient.	As explained in the **Statement of Need [APP-192]** solar power generation has global momentum, and various large-scale schemes are being developed in the UK. NPS EN-1 Paragraph 3.3.4 recognises that no single type of electricity infrastructure will be able to meet any UK government objectives in isolation, so new generators of varied technology, assets that provide flexibility and new networks will all be needed. However, the previous government concluded from its analysis that "*a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar*" (NPS EN-1 Paragraph 3.3.20). Solar is a proven technology. It is already delivering as part of the UK's electricity system and will continue to deliver further critical benefits to consumers through the urgent and continued decarbonisation, security of supply and affordability. Solar power generation has undergone significant technological advances in scale and commercial efficiency and solar panel efficiency is expected to continue improving over the course of the 2020s. It is therefore important to make best use of this natural, renewable energy resource to meet the UK's legal carbon emission reduction obligations.
AS-004	This is a rural village and the roads are quiet and narrow. The build process of the project will severely impact them. I believe that the roads will be often blocked with the scale and number of lorries required for the project. The proximity of the east coast mainline railway crossings adds another hazard to the traffic. The addition of the site workers and their transport to the site will add yet more chaos and disruption to the area. Notwithstanding the damage to the roads that are already suffering despite the current minimal road use.	A full and detailed assessment of potential traffic and transport impacts from construction at sensitive receptors has been undertaken within **Volume I, Chapter 13: Transport and Access [APP-065]**. Traffic during the operation and maintenance phase would be minimal. The **Transport Assessment [APP-179]** and **Framework CTMP [APP-206, APP-207]** provide full details of embedded mitigation measures that are proposed to prevent or reduce potential adverse effects associated with construction traffic on local roads. This includes measures such as suitable agreed Heavy Good Vehicle routes and timing restrictions, the use of traffic marshals at site accesses and crossing points, and the development of a communications strategy for those working on the Scheme. A detailed Construction Traffic Management Plan (which must substantially accord with the Framework CTMP) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by Requirement 13 in Schedule 2 to the **Draft DCO [APP-220]**. The **Framework CTMP [APP-206, APP-207]** outlines the specific vehicle routing requirements during construction. The report highlights that usage of both the Askern and Moss rail level crossings would need to be used to enable access to the Solar PV Site. The

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		Framework CTMP [APP-206, APP-207] also sets out measures to minimise the impacts and disturbance caused by construction traffic on the local and strategic road network. This includes a description of measures to be introduced to minimise impacts associated with traffic using the level crossings. The Applicant does not propose to affect the operation of the level crossing either through use as part of construction routes or through any proposed temporary traffic management. Where staff or delivery traffic uses the level crossing, drivers will comply with the operation of the level crossing, rather than affecting the operation of the crossing itself.

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