FENWICK SOLAR FARM

Fenwick Solar Farm

EN010143

Applicant's Response to Examining Authority's First Written Questions (ExQ1)

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Prepared for:
Fenwick Solar Project Limited

Prepared by:
AECOM Limited

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1. Introduction

1.1.1 The purpose of this document is to provide Fenwick Solar Project Limited's (the Applicant) responses to the Examining Authority's (ExA) first written questions (ExQ1) **[PD-007]** which are directed to the Applicant.

1.1.2 Section 1.2 of this report is tabularised to include the ExA's questions and a response to each question as follows:

a. The Development Consent Order and other consents (24 questions);

b. General and cross-topic questions (9 questions);

c. The need case, electricity generated and climate change (3 questions);

d. Other projects and cumulative effects (2 questions);

e. Landscape and visual, glint and glare, and good design (12 questions);

f. Biodiversity (28 questions);

g. The water environment (12 questions);

h. Soils and agriculture (15 questions);

i. The historic environment (8 questions);

j. Transport and access, highways and public rights of way (25 questions);

k. Noise and vibration, air quality and nuisance (26 questions);

l. Socio-economics, tourism and recreation (8 questions);

m. Other planning matters (29 questions); and

n. Compulsory Acquisition and related matters (13 questions).

Table 1-1: Abbreviations

Abbreviation	Definition
AADT	Annual Average Daily Traffic
AAWT	Annual Average Weekly Traffic
AEP	Annual Exceedance Probability
AIL	Abnormal Indivisible Load
CL:AIRE	Contaminated Land: Applications in Real Environments
ALC	Agricultural Land Classification
AMS	Archaeological Mitigation Strategy
ATC	Actual Traffic Count
BESS	Battery Energy Storage System
BHT	Burnet Heritage Trust
BMV	Best and Most Versatile
BNG	Biodiversity Net Gain

Abbreviation	Definition
BRES	Business Register and Employment Survey
BS	British Standard
BSMP	Battery Safety Management Plan
CDC	City of Doncaster Council
CEMP	Construction Environmental Management Plan
CNP	Critical National Priority
CTMP	Construction Traffic Management Plan
DCO	Development Consent Orders
DLRC	Doncaster Local Records Centre
DMRB	Design Manual for Roads and Bridges
DRA	Dust Risk Assessment
EA	Environment Agency
ERP	Emergency Response Plan
ES	Environmental Statement
FAMS	Framework Archaeological Mitigation Strategy
FBSMP	Framework Battery Safety Management Plan
FLEMP	Framework Landscape and Ecological Management Plan
FRA	Flood Risk Assessment
FSMP	Framework Soil Management Plan
GVA	Gross Direct Value Added
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicles
HRA	Habitat Risk Assessment
IEMA	Institute of Environmental Management and Assessment
INNS	Invasive Non-Native Species
LEMP	Landscape Environmental Management Plan
LFP	Lithium Ferrophosphate
LOAEL	Lowest Observed Adverse Effect Level
MMP	Materials Management Plan
MSA	minerals safeguarding area
NESO	National Energy System Operator
NETS	National Electricity Transmission System
NFCC	National Fire Chiefs Council
NFPA	National Fire Protection Organisation
NPS	National Policy Statement
NRMM	Non-road Mobile Machinery
NSER	No Significant Effects Report

Abbreviation	Definition
NSIP	Nationally Significant Infrastructure Projects
ODPS	Outline Design Parameters Statement
OEMP	Operational Environmental Management Plan
OMH	Open Mosaic Habitat
PDL	Previously Developed Land
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PV	Photovoltaics
RCA	River Condition Assessment
RPA	Root Protection Area
SAC	Special Area of Conservation
SMP	Soil Management Plan
SOAEL	Significant Observed Adverse Effect Level
SPA	Special Protection Area
SPI	Species of Principal Importance
SSSI	Site of Special Scientific Interest
SUD	Sustainable Urban Drainage
SYAS	South Yorkshire Archaeology Service
TCPA	Town and Country Planning Act
TP	Temporary Possession
fsWMP	framework Site Waste Management Plan
WR	Written Representation
WSA	Water Storage Area

1.2 Responses to the Examining Authority's First Written Questions

Table 1-2. Responses to ExQ1

ExQ1	Respondent	Question	Applicant's Response
1.	**The draft Development Consent Order and other consents**		
1.1.1	Applicant	**Article 2 (Interpretation) - Definition of 'order land'** Please review the definition of 'order land' in Article 2 and consider whether it could be more precisely defined so it aligns with the approach used in other made solar Development Consent Orders (DCO) (e.g. by reference to the different colouring on the land plans).	The Applicant has updated Article 2 in the draft DCO (Revision 03) for Deadline 2 **[EN010152/APP/3.1]** to reflect wording in other recent solar DCOs by including more specific reference to the land within the relevant plans. Specifically the updated definition provides: *"Order land" means the land which is required for, or is required to facilitate, or is incidental to, or is affected by the authorised development shown coloured pink, blue or yellow on the land plans and which is within the limits of land to be acquired or used as is described in the book of reference;*
1.1.2	Applicant	**Article 2 (Interpretation) – Definition of 'commence'** The definition of 'commence' is tied to s.56(4) of the Town and Country Planning Act 1990 (TCPA 1990), which appears incorrect. Please review and consider whether the definition should instead refer to s.155 PA 2008.	The reference to section 56(4) of the TCPA 1990 in the definition of "material operation" for the purposes of the definition for commence is intentional. "Material operation" within section 56(4) of the TCPA is clearly defined by a list of activities, being: *a) any work of construction in the course of the erection of a building;* *(aa) any work of demolition of a building;]* *(b) the digging of a trench which is to contain the foundations, or part of the foundations, of a building;*

ExQ1	Respondent	Question	Applicant's Response
			(c) the laying of any underground main or pipe to the foundations, or part of the foundations, of a building or to any such trench as is mentioned in paragraph (b); *(d) any operation in the course of laying out or constructing a road or part of a road;* *(e) any change in the use of any land which constitutes material development.* By comparison, section 155 of PA 2008 defines "material operation" as *"any operation except an operation of a prescribed description."* The TCPA section 56(4) definition is considered clearer and more useful for application and enforcement by the undertaker and local planning authority. It ensures "commencement" is understood on the same terms as in a TCPA application, which local planning authorities are used to applying. It also reduces any risk of an inadvertent breach of a Requirement by undertaking an action which is not within the commonly understood material operations in the TCPA, but which was not foreseen for the purpose of the permitted preliminary works as drafted. As a breach of a Requirement is a criminal offence, it is preferable that the definition for such operations is clear such that it could avoid dispute or unnecessary enforcement action for acts which are widely accepted to be non-material.

ExQ1	Respondent	Question	Applicant's Response
			This definition, and utilisation of the TCPA definition has been widely adopted in recent solar DCOs with the support of local authorities, including the East Yorkshire Solar Farm Order 2025, the West Burton Solar Project Order 2025, the Cottam Solar Project Order 2024, and the Gate Burton Energy Park Order 2024.
1.1.3	Able Uk Limited/Elba Securities Limited	**Article 13 (Use of private roads)** The ExA notes that the applicant updated Article 13 at deadline 1 to limit the scope of this power. Please comment on the updated article and whether or not it addresses the concerns raised in relation to this article as set out in your deadline 1 submission [REP1-057].	The Applicant notes that further discussions have occurred between the Applicant and Able/Elba regarding this provision, including updates to the **Streets, Rights of Way and Access Plans** (Revision 03) **[EN010152/APP/2.3]** to be submitted atr Deadline 2 of examination. This is set out in further detail in Table 3-3 of the **Applicant's Response to Applicants response to Submissions Received at Deadline 1 [EN010152/APP/8.20]**
1.1.4	Applicant	**Article 14 (Access to works)** Please explain why this article does not require the undertaker to restore any temporary access created to the reasonable satisfaction of the street authority.	Article 14 provides powers in respect of access (i.e. the turning in and out of vehicle at the defined locations) as opposed to physical works to the street. For some of those accesses provided, no physical works to the street may be required. Where physical works are required to be undertaken, those physical works are technically undertaken under the street alteration powers as set out within Article 9 of the draft DCO. Article 9(3) requires than those works to temporarily alter a street (including to create a temporary access) must be restored to the reasonable satisfaction of the street authority.

ExQ1	Respondent	Question	Applicant's Response
			At each of the temporary locations for access identified within Part 2 of Schedule 7 of the **draft DCO [EN010152/APP/3.1]**, and shown in the corresponding position on the **Streets, Rights of Way and Access Plans [EN010152/APP/2.3]**, corresponding powers in respect of street alteration are included. This is the same wording and approach which has been utilised in all recent made solar Orders, including the East Yorkshire Solar Farm Order 2025, the West Burton Solar Project Order 2025, the Cottam Solar Project Order 2024, and the Gate Burton Energy Park Order 2024.
1.1.5	Applicant	**Article 15(1) (Agreements with street authorities)** The ExA notes that the reference to Article 10(1) in 15(1)(c) was modified by the SoS in the Cottam Solar Farm Correction Order so that it applies to the whole of Article 10. Please amend accordingly or provide an explanation as to why it should not be amended.	Article 15 has been updated in the draft DCO for Deadline 2 (Revision 03) **[EN010152/APP/3.1]** to refer to Article 10 in full, in alignment with the corrected Cottam Solar Farm Order 2024.
1.1.6	Applicant	**Article 16(5)(c) (Traffic regulation measures)** The ExA notes that this provision has appeared on other recently made DCOs. However, it is unclear what information it is referring to and whether or not it should also be subject to a timescale as in (a) and (b). Please review the drafting.	The Applicant has reviewed the provision, and acknowledges it may be misread without further context. The Applicant's understanding is that the Order limits notice would be intended to capture the same information as in the newspaper notices (given it is also intended to inform the public) and be published simultaneous. As such the Applicant has

ExQ1	Respondent	Question	Applicant's Response
			proposed the further amendments in the **draft DCO** (Revision 03) **[EN010152/APP/3.1]** at Deadline 2: *(5) The undertaker must not exercise the powers in paragraph (1) or (2) unless it has—* *(a) given not less than 4 weeks' notice in writing of its intention so to do to the chief officer of police and to the traffic authority in whose area the road is situated; ~~and~~* *(b) not less than 5 working days before the provision is to take effect published the undertaker's intention to make the provision in one or more newspapers circulating in the area in which any road to which the provision relates is situated~~.~~ ; and* *(c) not less than 5 working days before the provision is to take effect displayed a site notice containing the same information as in the newspaper notices specified at sub-paragraph (b) at each end of the length of road affected.*
1.1.7	Applicant	**Article 18 (Protective works to buildings)** Paragraph 5.4.3 of the Explanatory Memorandum [REP1-007] explains that this article is required because there are buildings within, and in close proximity to, the order land that might require surveys and protective works. The applicant is asked to identify these buildings and explain the nature of protective works likely to be required.	Based on the assessment of construction activities as set out within the ES, the Applicant considers there are no buildings which are likely to be subject to damage, such that protective works under Article 18 would be required. However, Article 18 was retained within the Order based on other made solar DCOs to provide comfort to local communities that should this not be the

ExQ1	Respondent	Question	Applicant's Response
			case, the Applicant would have the powers to undertake any protective works they may request. If the Examining Authority considers the Article is superfluous and this offer need not be retained, the Applicant therefore wolinkeuld be willing to remove Article 18 from the draft DCO.
1.1.8	Applicant	**Article 20(1)(b) (Compulsory acquisition of land)** Please review the reference to 'undertaking' – should this be 'authorised development'?	The Applicant has updated this Article in the **draft DCO** (Revision 03) **[EN010152/APP/3.1]** at Deadline 2 to refer to authorised development, as reproduced below. *20.—(1) The undertaker may—* *(a) acquire compulsorily so much of the Order land as is required for the authorised development or to facilitate, or as is incidental, to it; and* *(b) use any land so acquired for the purpose authorised by this Order or for any other purposes* *in connection with or ancillary to the ~~undertaking~~authorised development.* *(2) This article is subject to article 21 (time limit for exercise of authority to acquire land compulsorily), article 22(2) (compulsory acquisition of rights), article 29 (temporary use of land for constructing the authorised development), and article 31 (statutory undertakers).*

ExQ1	Respondent	Question	Applicant's Response
1.1.9	Applicant	**Article 29(1)(b) (Temporary use of land for constructing the authorised development)** Please provide further justification for the inclusion of the power to remove buildings and drainage on land temporarily used to construct the authorised development. Please identify any known buildings or drainage likely to be affected.	The Applicant has updated this Article in the **draft DCO** (Revision 03) **[EN010152/APP/3.1]** at Deadline 2 to remove the reference to "buildings" at Article 29(1)(b), as it does not propose to remove any buildings as part of the authorised development. However, the wording for "drainage" is retained. There are existing drainage measures included across the Order limits, including in respect of drainage included alongside private roads and streets to be temporarily trenched and then reconstructed, as well as field drains or agricultural drainage ditches included within the fields that may require temporary removal and replacement in the laying of cables or similar infrastructure. It is not considered feasible to provide a plan which identifies all potential drainage which may be affected within the Order limits, given the final location of such drainage and works remains subject to final surveys and detailed design. However, any removal or impact on drainage as required for construction will be appropriately managed via the **Appendix 9-4, Framework Drainage Strategy of ES Volume III [APP-160]** as secured by Requirement 9 of the **draft DCO** (Revision 03) **[EN010152/APP/3.1].**
1.1.10	Applicant	**Article 29 and Article 30 (Temporary possession)**	**(a) Notification to landowners of temporary possession powers**

ExQ1	Respondent	Question	Applicant's Response
		The ExA notes that Article 29(1)(a)(ii) extends the power to take temporary possession to any of the order land. (a) Please can the applicant explain the steps that have been taken to alert all landowners/occupiers of land within the order limits of this possibility. (b) Please can the applicant justify the 14-day period set out in Article 29(3). (c) Please can the applicant explain why it considers only 28 days' notice should be required before entering on and taking possession of land under Article 30(3).	The Applicant has engaged with landowners throughout the pre-application and post application process in respect of the intended use, and legal interests sought in their land. This included: • Direct engagement, in order to negotiate voluntary agreements for permanent and temporary rights and interests over the Order land. For the large majority of landowners, voluntary agreements are in negotiation (or have been completed) which include both permanent and temporary possession rights within them. • Formal notification in the section 42(1)(d) letters issued for Statutory Consultation (see **Appendix J1, Consultation Report [APP-036]**]) that the DCO would seek "*The permanent compulsory acquisition of land and/or an interest in or right over land and temporary use powers;*". • Formal notification in the section 56 letters issued post-acceptance which included excerpts from the **Land Plan [APP-006]** showing the area of land affected and the fundamental rights sought (ie Permanent acquisition of land or rights). The Applicant further notes that the powers enabled under Article 29(1)(a)(ii) are to enable the use of less onerous powers over land, to ultimately reduce the permanent rights/easements sought from landowners.

ExQ1	Respondent	Question	Applicant's Response
			For example, within the Grid Connection Corridor, while a working width of up to 30m is required, the ultimate permanent easement width required for the installed cable is only 6m. If the undertaker was to utilise the broader permanent rights powers it has over the Grid Connection Corridor for the full extent of the working width, this would be disproportionate to the actual rights it actually needs. Instead, Article 29(1)(a)(ii) enables the undertaker to apply temporary possession of the working area for up to 1 year for construction, and then, once the cabling is constructed and the final area required for a permanent easement is certain, utilise its rights to apply a permanent easement over that narrower area. This approach, and the associated wording in Article 29(1)(a)(ii), has been applied in every made solar DCO except Little Crow Solar Park Order 2022 (which only omitted the wording as it did not seek temporary possession). As outlined in the **Explanatory Memorandum [REP1-007**] this *"reflects a common approach to designing and building infrastructure projects, whereby possession is taken of a wider area required for the purposes of construction, and once the location of new apparatus is known definitively (after it has been built), then the final area of land required permanently is defined and acquired. This allows a*

ExQ1	Respondent	Question	Applicant's Response

more proportionate approach to the extent of land acquisition."

Therefore, even should a landowner have mis-understood consultation documents or notification letters to consider the Applicant only had rights to apply permanent easements over the full extent of their land within the Order limits, the Applicant considers they would be at no disadvantage as:

- The voluntary engagement with landowners has been very clear that a combination of temporary and permanent rights were being sought.
- The use of temporary rights are less onerous than if the Applicant were to apply permanent rights over the entire extent of the Order land, and as such the landowners were on notice to the "worse case" scenario in respect of compulsory purchase powers.

(b) 14 day notice under Article 29(3)

The 14 day period within Article 29(3) provides that the undertaker must provide 14 days notice prior to entry on and taking temporary possession of land for the purpose of construction of the authorised development.

This time period aligns with the same 14-day period required for notice of powers of entry enabled under section 11A of the Compulsory Purchase Act 1965. This time period also aligns with the drafting of the

ExQ1	Respondent	Question	Applicant's Response
			same Article within the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009 (specifically, clause 28), and within the large majority of made DCOs, including the majority of previously made solar DCOs including East Yorkshire Solar Farm 2025, West Burton Solar Project 2025, Cottam Solar Project 2025 and Cleve Hill Solar Park Order 2020. While the Applicant notes the submissions by Able UK Ltd that the draft Planning and Infrastructure Bill, as current progressing through Parliament may amend these timeframes, the Bill is still in draft form and is still subject to further amendments. The Applicant does not consider it appropriate to change the established timeframes as set within existing legislation and DCO precedent in advance of clear direction from Parliament. The Applicant would be willing to revisit this matter should this legislation come into force with a change to those timeframes prior to the close of Examination. It is noted that of course the timeframes included within Article 29(3) are minimum timeframes only. The undertaker will of course endeavour to work with landowners such that they have sufficient notice well in advance of these timeframes in practice, as it remains in the undertaker's interests to work collaboratively with landowners and their existing activities in order to avoid any delays or other issues

ExQ1	Respondent	Question	Applicant's Response

during construction. The voluntary agreements entered into with landowners set clear notification periods for any possession required for both construction or maintenance purposes. Landowners will also generally be under informal notice of the likelihood of temporary possession in the period leading up to and during the construction period for the Scheme.

However, particularly ahead of the details of construction management and detailed design being in place, the Applicant cannot commit to shorter time periods for the means of this strict, legal minimum timeframe, particularly to enable minor changes in dates for temporary possession of each land parcel at the time of construction.

(c) 28 day notice in Article 30(3)
By comparison to the period for notice within Article 29, which relates to notice for temporary possession required for construction, Article 30 relates to temporary possession required for maintenance of the authorised development.

Again this time period comes from the drafting of the same Article within the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009 (specifically, clause 29), and within the large majority of made DCOs, including all previously made solar DCOs except Little Crow Solar Park

ExQ1	Respondent	Question	Applicant's Response
			Order 2022 (which only omitted the wording as it did not seek temporary possession). As per Article 29, the Applicant does not consider it appropriate to incorporate a new time frame than that included in those precedents until legislation has been clearly set by Parliament supporting such a change. The longer time period is considered reasonable and workable in the maintenance period as opposed to the shorter period during construction as maintenance activities are anticipated to be less frequent and complex than the scheduling of construction activities, and as such require less flexibility in these legal, minimum notice requirements. It is also acknowledged that landowners will not have the general notice in place for maintenance activities during the operational period as they will for construction activities during the shorter period of construction. However, as with Article 29, the undertaker will of course endeavour to work with landowners such that they have sufficient notice well in advance of these timeframes in practice, as it remains in the undertaker's interests to work collaboratively with landowners. The voluntary agreements entered into with landowners set clear notification periods for any possession required for both construction or maintenance purposes.

ExQ1	Respondent	Question	Applicant's Response
1.1.11	Applicant	**Article 35 (Consent to transfer the benefit of the order)** The ExA notes that Article 35(6) provides for a notification period of 10 working days in the event of a transfer of the benefit of the order in circumstances where the consent of the SoS is not required. The ExA notes that the majority of made solar DCOs include a minimum period of 14 working days for the undertaker to notify the SoS of a transfer not requiring consent. The ExA considers this is a good indication of the SoS's preferred notice provisions. Please amend this provision so that it accords with the majority of other made solar DCOs or provide an explanation as to why, in the context of his particular application, a shorter period should be applied.	The Applicant has updated the **draft DCO** (Revision 03) **[EN010152/APP/3.1]** at Deadline 2 to adjust the notification period in Article 35(6) to 14 working days.
1.1.13	Applicant	**Schedule 1 (Authorised development)** - Does the applicant consider references in this Schedule to gross electrical capacity should specify alternating current in order to provide certainty.	The Applicant has updated the references to gross electrical output capacity in Schedule 1 as follows to address this suggestion: *"**Authorised development*** *2. In the Unitary authority of Doncaster a nationally significant infrastructure project as defined in sections 14 and 15 of the 2008 Act and associated development under section 115(1)(b) of the 2008 Act. The nationally significant infrastructure project comprises up to one generating station with a gross electrical output capacity of over 50 megawatts (alternating current) comprising all or any of the*

ExQ1	Respondent	Question	Applicant's Response
			work numbers in this Schedule or any part of any work number in this Schedule— ***Work No. 1 –*** *a ground mounted solar photovoltaic generating station with a gross electrical output capacity of over 50 megawatts (alternating current) including—* *(a) solar panels fitted to mounting structures; and* *(b) field stations;* *and associated development within the meaning of section 115(2) of the 2008 Act including— […]"*
1.1.14	Applicant	**Schedule 1 – Work No.4 (b)** – please correct the typographical error in "Thorp Marsh Substation".	The Applicant has updated the **draft DCO** (Revision 03) **[EN010152/APP/3.1]** at Deadline 2 to correct the typographical error.
1.1.15	Applicant	**Schedule 1 – Work Nos 4 and 5.** Paragraph 2.6.36 of ES Chapter 2: the Scheme [APP-054] explains that the line drop option has been incorporated into the scheme as an alternative to the grid connection corridor. Similarly, paragraph 3.2.9 of the Planning Statement [APP-246] states that the connection to NETS will be either via underground cabling along the grid connection corridor or via the line drop option. It goes on to state that should the line drop option be feasible, it would supersede the requirement for grid connection cables along the corridor and the line drop would be confined to the Solar PV Site. However, paragraph 14.7.15 of the planning statement [APP-246] and paragraph	This question is addressed alongside other questions raised about the line drop option in Appendix A.

ExQ1	Respondent	Question	Applicant's Response
		14.7.37 of ES Chapter 14: Other Environmental Topics [APP-066] explains that although the connection itself to the Line Drop would remain under National Grid's control, the timing of the works for the modification of the tower to connect the scheme to the NETS may coincide with the timing of the cable laying in the grid connection corridor and therefore has potential for cumulative effects. The ExA notes that the DCO makes provision for both options. Please confirm whether only one of the two options would be sought and explain how the DCO is drafted to ensure that, if the line drop option is considered viable, it is the only option taken forward. Please also explain the basis upon which such a decision will be made.	
1.1.16	Applicant	**Schedule 2 (Requirements)** The ExA notes that Schedule 2, R2(3) provides that any approval, agreement or confirmation required from a relevant planning authority under any of the requirements must be given in writing. In light of this, please consider whether the words 'in writing' are required in R4(1) and R10(1).	The Applicant acknowledges the duplication as noted by the ExA, and has removed "in writing" from Requirements 4(1) and 10(1) in the **draft DCO** (Revision 03) **[EN010152/APP/3.1]** at Deadline 2, in reliance on the catch-all provided at Requirement 2(3).
1.1.17	Applicant	**Schedule 2 – Requirement 6 (BNG)** The BNG Assessment [REP1-023] predicts a net gain of 36.46% for area habitat, 62.75% for hedgerow units and 24.97% for watercourse units. The applicant indicated at ISH1 that it would seek to achieve a minimum BNG of 10% across all habitat	The Applicant acknowledges this query, and has updated Section 2 within the **Landscape Ecological Management Plan** (Revision 02) **[EN010152/APP/7.14]** at Deadline 2 to which Requirement 6 references to explicitly note the 10% minimum Biodiversity Net Gain (BNG) must be provided across all habitat types.

ExQ1	Respondent	Question	Applicant's Response
		types. Please explain how the DCO will ensure that BNG will be secured across all habitat types.	
1.1.18	Applicant	**Schedule 2 (Requirements) – Requirement 8.** The ExA notes that the Outline Design Parameters (ODPS) Statement [APP-193] includes various outline parameters which relate to fencing. Should this requirement require the details submitted to be substantially in accordance with the relevant outline design parameters?	The Applicant does not consider it necessary for Requirement 8 to be updated to require accordance with the ODPS, as Requirement 4(2) already requires that the detailed design for the authorised development must accord with the outline design parameters statement. While the Applicant acknowledges that the final detailed design for fencing as referenced in Requirement 8(1) will include matters within the ODPS, the same could be said for details referenced in several other requirements, including for example, in respect of drainage, battery safety, construction and operational management measures. The Applicant considers it is preferable to avoid unnecessary repetition and instead rely on the already clear measure within Requirement 4(2) to ensure the ODPS are implemented in full.
1.1.19	Applicant	**Schedule 4 (Streets subject to street works)** The ExA notes the use of the words 'within proximity of' in this schedule are insufficiently precise. Please amend to a more precise form of words (eg. 'between points [x] and [y]') or provide a further justification for their use.	The Applicant considers the wording is sufficiently precise when reviewing the wording as against the **Streets, Rights of Way and Access Plan** (Revision 03) **[EN010152/APP/2.3]**, as while the access points are used as a locational tool to help identify the area of streetworks within each sheet, the powers themselves are constrained instead to **"the length shown in green patterned hatching"**. The Applicant considers that to further define these

ExQ1	Respondent	Question	Applicant's Response
			extents using additional markers confirming the various edges of these streetworks would make this Plan overly cluttered and less applicable for the undertaker and local streets authorities. It is further noted that this approach to identifying streetworks (ie to rely on the areas as shaded in highlight or hatching) has been adopted and considered sufficiently precise on other recently made solar DCOs, including the Gate Burton Energy Park Order 2024, the Mallard Pass Solar Farm Order 2024 and the East Yorkshire Solar Farm Order 2025.
1.1.20	Applicant	**Schedule 5 (Alteration of streets) – Part 1** Please consider whether a more precise description of the proposed alterations can be included in column 3 of Part 1. Please explain the meaning and purpose of the words 'subsequent to improvements to adjoining field access'.	The Applicant considers the wording within Schedule 5, Part 1, column 3 is sufficiently precise for the purpose of Article 9. The alteration of layout anticipated to be "subsequent to improvements to adjoining field access" may include, for example, to create or widen a bellmouth and adjust the drainage/curb within the footprint of the adjoining highway. The exact works and their extent will depend on the particular use (eg the nature, frequency and type of vehicles) in each instance and the existing quality of any informal field access which may currently be in place but not have associated bellmouths formally tying it into the highway/street network.

ExQ1	Respondent	Question	Applicant's Response
			It is considered by the Applicant that this wording is as precise, or more precise than that used within the corresponding schedules for other recently made solar DCOs, including: • The Mallard Pass Solar Order 2024 which at Schedule 5, Part 1 refers to "*Works for the provision of a permanent means of access to the authorised development within the area shown hatched* [XXX]" • The Gate Burton Solar Order 2024 which at Schedule 5, Part 1 refers to "*Permanent alteration of layout at the point marked* [XXX]" • The East Yorkshire Solar Farm Order 2025 which at Schedule 5, Part 1 refers to "*Existing field access at the point marked* [XX] *to be retained and improved*."
1.1.22	Applicant	**Schedule 15 (Procedure for discharge of requirements)** •Paragraph 4(2)(a) – please check reference to paragraph 2(1). • Paragraph 4(2)(c) - Please remove the word 'forthwith'. Paragraph 4(4) – Please correct the typographical error in the final line (ie reference to paragraph '2(f)').	In response to these comments the Applicant can confirm the **draft DCO** has been updated at Deadline 2 (Revision 03) **[EN010152/APP/3.1]**to: • Change the reference in paragraph 4(2)(a) from 2(1) to 2(2) • Remove the word "forthwith" in paragraph 4(2)(c) • Correct the typo in paragraph 4(4).
1.1.23	Applicant	Please confirm whether any land within the order limits falls within the order limits of any other made (or proposed) DCO or within the red line boundary of	There are no proposed Nationally Significant Infrastructure Projects (NSIP's) that fall within the Order limits of the DCO. It is noted that consent was

ExQ1	Respondent	Question	Applicant's Response
		any extant planning consent and if so, how the applicant proposes to deal with any interaction in the dDCO.	granted in March 2016 for the Thorpe Marsh Gas Pipeline NSIP which falls within the Order limits of the DCO. However, it is understood that this permission has expired and could therefore not be implemented.
1.1.24	Applicant	Does the applicant, having viewed the RRs and WRs, anticipate including additional protective provisions in the dDCO? If so, please provide details.	The Applicant does not consider any further protective provisions will be necessary than those already included in either draft (i.e. subject to further negotiation) or final form within the **draft DCO** (Revision 03) **[EN010152/APP/3.1]**as of Deadline 2. The only protective provisions subject to ongoing negotiation are those that the Applicant is discussing with the DANVM Drainage Commissioners.
2.	**General and cross-topic matters**		
1.2.1	Applicant/National Grid	ES Chapter 2: The Scheme [APP-054] explains that the feasibility of connecting the On-Site Substation via a line drop from existing overhead lines is being explored. Furthermore, it indicates that the determination of this option's viability will only be possible after any DCO consent has been granted. Please explain why it is not possible to determine the viability of a line drop option prior to any consent being granted.	The response to this question, alongside other ExQ1s about the line drop option is provided in the attached **Appendix A**.
1.2.2	Applicant	ES Chapter 2: The Scheme [APP-054], Table 2-1 sets out the design parameters that were assessed within the ES (See paragraph 2-5-10). This includes a maximum footprint of the BESS area of up to	Page 8 of the **ODPS** (Revision 01) **[EN010152/APP/7.4]** has been updated to specify that *'The BESS area would be up to 250 m by 200 m and located…'*.

ExQ1	Respondent	Question	Applicant's Response
		250m by 200m. This parameter does not feature in the ODPS [APP-193]. Please update the ODPS so that it captures all of the maximum parameters as set out in Table 2-1.	
1.2.3	Applicant	The ODPS [APP-193] explains that for field station configurations (b) and (c), string inverters would either be mounted parallel to the Solar PV Tables, or more likely be mounted at the end of the Solar PV Table frame. It goes on to state that **'one single string inverter unit could be utilised for approximately every 10 to 12 Solar PV Tables'**. Please clarify whether the text in bold is intended to operate as a maximum parameter and amend the wording of the ODPS to remove any uncertainty.	Page 6 of the **ODPS** (Revision 01) **[EN010152/APP/7.4]** has been updated to specify that *'One single string inverter unit will ~~could~~ be utilised up to ~~for approximately~~ every 10 ~~to 12~~ Solar PV Tables'.* The amended text is intended to operate as a maximum parameter.
1.2.4	Applicant	Page 5 of the ODPS [APP-193] includes a design parameter to ensure all field stations are located outside of Flood Zones 2 and 3. However, on page 6 it states, in relation to field station configurations (b) and (c), that 'due to the location of some Solar PV Panels in Flood Zone 2 and Flood Zone 3, the maximum height of string inverters in these Flood Zones is expected to be up to 2m AGL.' Please explain this apparent inconsistency.	The three field station configurations are defined at Schedule 1 of the **Draft DCO** (Revision 03) **[EN010152/APP/3.1**. In summary, they comprise: a) Transformers, inverters and switchgear housed in a single container. b) Transformers and switchgear housed in a single container and inverters provided in either a separate single container or installed as string inverters. c) Transformers, switchgear and inverters provided separately, which may be in one or more containers. Inverters may also be installed as string inverters.

ExQ1	Respondent	Question	Applicant's Response
			Therefore, all options include containers as part of their configuration. However, the distinction in configurations b) and c) is that string inverters, if used, won't be housed in a container but would be provided separately and mounted on a ground mounted frame which is parallel to the mounting structure. This arrangement is illustrated at Plate 2-3 of **ES Chapter 2: The Scheme [APP-054]**). Therefore, page 5 of the **ODPS** (Revision 01) **[EN010152/APP/7.4]** has been updated to specify that *'Field Stations housed in a container will be located outside of ~~Flood Zone 2 and~~ Flood Zone 3b'*. The reference to 'Flood Zone 2' was an error and has therefore been deleted and the reference to 'Flood Zone 3' has been updated to 'Flood Zone 3b'. All Field Stations housed in a container will be located outside Flood Zone 3, except one located in Field SE2. Some Field Stations housed in a container will also be situated in areas designated as Flood Zone 2. However, all Field Stations housed in a container located within the Credible Maximum Scenario flood extent (the design flood event) will be raised 300 mm above the flood level associated with this event. This is consistent with the conclusions of the Flood Risk Assessment **ES Appendix 9-3: Flood Risk Assessment [APP-158 and APP-159]** and has been discussed with the Environment Agency. The addition of 'in a container' aligns with the location of Field Stations identified on

ExQ1	Respondent	Question	Applicant's Response
			Environmental Statement (**ES) Volume II Figure 2-3: Indicative Site Layout Plan [APP-074].**
1.2.5	Applicant	The ODPS [APP-193] includes design parameters for the external finishes for field stations for configuration (c) only, ensuring that where this configuration is used the transformers and switch gear cabins are in keeping with the prevailing surrounding environment. Please explain why a similar design parameter is not included for configurations (a) and (b).	The following text has been added to page 6 of the **ODPS** (Revision 01) **[EN010152/APP/7.4]**: *'The containers would be externally finished in keeping with the prevailing surrounding environment, often with a green or grey painted finish'*. The addition of this text ensures that a similar design parameter is achieved for configurations (a) and (b).
1.2.6	Applicant	Paragraph 1.2.4 of the ODPS [APP-193] explains that maximum parameters for the temporary constructions and decommissioning compounds were not included because the parameters for these temporary compounds is already provided for on the Works Plan [APP-214] and the Framework Construction Environmental Management Plan (fCEMP) [REP1-019]. Please state the maximum parameters for the temporary construction and decommissioning compounds and signpost where in the fCEMP this information can be found.	The maximum geographic parameters of the temporary construction and decommissioning compounds are identified by Work Nos. 4, 5 and 6 on the **Works Plan [APP-214].** It is not expected that the compounds will require all the areas identified; for example, the extent of Work No. 6 associated with the Grid Connection Corridor is likely to be similar to the areas identified on **ES Volume II Figure 2-4 Location of Temporary Construction Compounds and Indicative Horizontal Directional Drilling (HDD) Areas [APP-075]**. However, the Applicant requires flexibility in the areas required pending the development of the Construction and Decommissioning Environmental Management Plans, secured by requirements 11 and 18 respectively of the **Draft DCO [REP1-005].** It is through these management plans that design,

ExQ1	Respondent	Question	Applicant's Response
			mitigation and control measures associated with the compounds will be agreed and which must be substantially in accordance with the **Framework Construction Environmental Management Plan [REP1-019]** and **Framework Decommissioning Environmental Management Plan [REP1-021]**. These control measures secure the design parameters of the compounds, and these are therefore not included in Table 1 of **ODPS** (Revision 01) **[EN010152/APP/7.4]**
1.2.7	Applicant	There appears to be contradictory text between the ES chapters as to whether the construction works (construction of the solar PV site and construction of the grid connection corridor) would be carried out in tandem or sequentially. Examples are: • ES Chapter 2: The Scheme [APP-054] paragraph 2.7.1 – start in tandem • ES Chapter 8: Ecology [APP-060] paragraph 8.6.2 – due to sequential nature of the construction programme • ES Chapter 14: Other Environmental Topics [APP-066] paragraph 14.2.36 – construction will not be occurring across the entire Site at one time. Table 14-5 page 14-21 start in tandem • Planning Statement [APP-190] paragraph 4.2.2 - start in tandem. Please clarify what whether the construction phase for both the solar PV site and the grid connection	The Applicant can confirm that the construction phase for both the solar PV site and the grid connection corridor would be carried out in tandem, as described in **ES Chapter 2: The Scheme [APP-054]**, **ES Chapter 14: Other Environmental Topics [APP-066]**, and the **Planning Statement [APP-190]**. The reference to the "sequential" nature of construction in **ES Chapter 8: Ecology [APP-060]** at paragraph 8.6.2 pertains specifically to the construction methodology within each of the Solar PV Sites once the work is underway. This means that, while construction of the solar PV site and the grid connection corridor would proceed in parallel, the works within each of those sites would not occur across the entire area simultaneously. Instead, the construction team would progress through the Solar PV Site in a phased or sequential manner—

ExQ1	Respondent	Question	Applicant's Response
		corridor would be carried out in tandem or sequentially.	spending a number of days in one area before moving on to the next. This phased working should not be interpreted as suggesting that the solar PV site and grid connection corridor would be constructed one after the other. Both elements are programmed to begin and progress in tandem, with sequential construction referring only to the internal phasing.
3.	**The need case, electricity generated and climate change**		
1.3.1	Applicant	National Policy Statement (NPS) EN-3 indicates that, along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output, although acknowledging that this will vary significantly depending on the site. Please explain how, at around 5.2 acres per MW of output, the proposed development represents an efficient use of land in this context.	For reference, the Applicant has reproduced the relevant paragraph of NPS EN-3 which discusses the 2-4 acre per MW reference. Specifically, paragraph 2.10.17 provides: *"Along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output. A typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. However, this will vary significantly depending on the site, with some being larger and some being smaller. This is also expected to change over time as the technology continues to evolve to become more efficient. Nevertheless, this scale of development will inevitably have impacts, particularly if sited in rural areas."* The Applicant notes, in respect of this paragraph, that the language used is by way of example, and is not directive as to the exact extent of acrerage per

ExQ1	Respondent	Question	Applicant's Response
			MW which is appropriate for solar farms. It is further noted that it does not provide a methodology for calculating the acres/MW nor does it explain how the 2-4 acres/MW guideline was derived. Analysis of the policies within NPS EN-3 which relate to efficiency and overplanting, were recently considered by the High Court in *Ross v SSHCLG* [2025] EWHC 1183 (Admin). Within this decision, the High Court concluded that the NPS EN-3 does not restrict the Scheme design and overplanting of a solar site, and that the appropriateness of overplanting should be considered on a holistic basis, as part of the planning balance and with reference to the particular design constraints or context of a particular Scheme. This may include consideration of the particular solar PV technology being deployed and anticipated rates of degradation, as well as other factors like the use of storage. It is with the above context as to the relevance of the NPS EN-3 discussion of land use that the Applicant has considered the ExA's question. The Applicant has assumed that the ExA figure of around 5.2 acres has been calculated by dividing the total area of the Site – including the Solar PV Site as well as the Grid Connection Corridor – (509 ha/ 1,259.77 acres) by the grid connection 237.5MW AC, which equates to 5.296 acres per MW.

ExQ1	Respondent	Question	Applicant's Response
			The Applicant has referred to other recent solar DCOs for reference as to the typical calculation methods used for assessing the MW/acre. • In the Recommendation Report for the Mallard Pass Solar Farm Order 2024, the ExA accepted the assessment approach proposed by the Applicant to calculate the maximum grid connection capacity as against the Solar PV Site only, excluding the grid connection corridor and biodiversity/mitigation areas (at paragraphs 3.2.97 – 3.2.102). This was accepted by the Secretary of State (at paragraph 4.18 of the Decision Letter). • In the Recommendation Report for the Gate Burton Energy Park Order 2024, the ExA assessed the maximum MW grid connection capacity as against that land captured as Work No. 1 (the solar panels and related solar plant), excluding all of the ancillary infrastructure (at 3.2.92). This was accepted by the Secretary of State (at paragraph 4.33 of the Decision Letter). • The Recommendation Report for the West Burton Solar Project Order 2025 included discussion at paragraphs 3.2.88-95 in respect of how that calculation could be undertaken. Some interested parties suggested it should be assessed against the anticipated lifetime yield for the Scheme, while the Applicant proposed it should be by reference to the maximum capacity

ExQ1	Respondent	Question	Applicant's Response
			of the grid connection. The ExA accepted the Applicant's approach. However, the Recommendation Report and Decision Letter were not clear as to which parcels of land the grid connection capacity was assessed against. • The Recommendation Report and Decision Letter for the Cottam Solar Project Order 2024 were also not clear as to how the 2-4 MW figure was assessed. • The Recommendation Report for the East Yorkshire Solar Farm Order 2025 considered the approach applied in Mallard Pass, confirming the Scheme would be within the 2-4MW range if the same approach was applied. However, it also noted an assessment could also consider the Solar PV Site as a whole, and in doing so the Scheme would fall outside of the 2-4MW (with a figure of 4.97acres/MW), suggesting the land take was high (paragraphs 3.2.66 – 3.2.72). However, this was not considered a significant issue for the planning balance in either the Recommendation Report or the Decision Letter (see paragraph 4.16). Following the decisions above, the Applicant suggests it is appropriate to apply the suggested 2-4MW example from NPS-3 as against the Solar PV installations alone (i.e. excluding the land required for the grid connection and the ecology mitigation and heritage buffer areas).

ExQ1	Respondent	Question	Applicant's Response
			Works No. 1 (inclusive of the BESS and substation area), as shown on **Works Plan [APP-214]**, covers an area of 258.3 ha/638.27 acres. Dividing the area of 638.27 acres by the grid connection of 237.5 MW equates to 2.69 acres per MW AC. This MW output per acre is well within the range identified by EN-3 and is therefore considered to be an efficient use of land within this context. However, even if a more conservative approach were to be applied, such as in the East Yorkshire Solar Farm Order, where the mitigation and enhancement areas were included and the grid connection capacity was assessed against the entire Solar PV site, the Scheme would still fall within the 2-4MW/acre indicative value. This is because the Solar PV site equates to approximately 790 acres, which if divided by the 237.MW of the Scheme's grid connection would equate to 3.326 acres per MW AC.
1.3.2	Applicant	Section 6.6 of the statement of need sets out the rationale for overplanting, and that the proposed development's indicative design (see [APP-074]) illustrates that a commercially rational overplanting ratio can be delivered. Please provide further details on the anticipated amounts of overplanting including the expected overplanting ratio and the amount of additional energy generation it would result in.	The final overplanting ratio for the Scheme will be determined at the detailed design stage, as it requires careful balancing of financial and technical considerations, including the final specifications of solar panels to be installed. However, the current indicative design shows a direct current (DC) installed capacity of 353.52 MWp against an alternating current (AC) export capacity of 237.5

ExQ1	Respondent	Question	Applicant's Response
			MW, resulting in an indicative overplanting ratio of approximately 1.49. Indicatively, different overplanting ratios have varying effects on energy yield and performance: • At a ratio of 1.2, an additional 19% annual energy yield is achieved with a 1% reduction in specific yield and performance ratio. • At a ratio of 1.4, an additional 37% annual energy yield is achieved with a 2% reduction. • At a ratio of 1.6, an additional 51% annual energy yield is achieved with a 6% reduction. Developers typically seek to optimise this balance, and for this Scheme, the optimal overplanting ratio is expected to fall within the range of 1.3 to 1.5. In line with NPS EN-3, reasonable overplanting is acceptable in a planning context where it can be justified, the electricity export does not exceed the NSIP threshold, and the development and its impacts are assessed based on the full proposed extent, including any overplanting. As discussed at ExQ1.3.1 above, the recent High Court decision *Ross v SSHCLG* [2025] EWHC 1183 (Admin) is relevant to this question. Within this decision, the High Court concluded that the NPS EN-3 does not restrict the Scheme design and overplanting of a solar site, and that the

ExQ1	Respondent	Question	Applicant's Response
			appropriateness of overplanting should not be restricted to just considering panel degradation. In this case, the developer had also sought to overplant to address: (i) the difference between the maximum output of the panels in laboratory conditions vs the actual output in the field; and (ii) the configuration of Solar PV Site and fluctuations in the level of sunlight over the course of the day and the year so as to maximise energy generation overall. The Court considered these justifications did not go against the policy direction in NPS EN-3. The assessment presented within the ES and **Statement of Need [APP-192]** aligns with this context, and including the justification for overplanting to account for degradation, to make the most of co-located storage (as applied in this case) and to consider the particular features of the specific Site and the appropriate design and layout for that land.
1.3.3	Applicant	The Grid Connection Statement [APP-194] indicates that a grid connection agreement for 237.5MW has been entered into with National Grid. Please confirm the current connection date and signpost where this information can be found in the application documents.	The Applicant can confirm that the current connection date is April 2032. This is not included within the application documentation, but is available for review in the National Energy System Operator (NESO) TEC Register. It is the Applicant's intention to apply to National Grid via a Modified Application for this date to be brought forward if a development consent order is granted.

ExQ1	Respondent	Question	Applicant's Response
4.	**Other projects and cumulative effects**		
1.4.2	Applicant	The City of Doncaster Council's (CDC) Local Impact Report [REP1-043] refers to two solar farm DCO projects (Tween Bridge Solar DCO and Whitestone Solar Farm DCO); and the WR from Mr and Mrs Connolly [REP1-065] refer to a further five solar projects (Soay Solar Farm and Thorton Green, Kingfisher Solar, Driffield Solar, Mylers Leah Solar and Peartree Hill Solar Farm DCO). Please comment on whether this new information affects the applicant's assessment of cumulative effects.	A summary of the cumulative assessment can be found within **Volume I, Chapter 15: Cumulative Effects and Interactions [APP-067]**. The developments listed, comprising Tween Bridge Solar, Whitestone Solar Farm, Soay Solar Farm and Thorton Green, Kingfisher Solar, Driffield Solar, Mylen Leah Solar and Peartree Hill Solar Farm, have not been considered in the cumulative assessment as they are located outside the ZoI for all topics. This includes that for the transport and access assessment. For the purposes of cumulative assessment, this extent is considered as no further than the traffic survey locations shown in **ES Volume II Figure 13-2: Traffic Survey Locations [APP-124]**. The only additional scheme referenced with the potential for cumulative impacts due to its proximity to the Scheme is Tween Bridge Solar Farm, which would be located 7.8km east of the order limits. On review of the Tween Bridge Solar Farm Preliminary Environmental Information Report (PEIR), Chapter 12-Transport and Access, it is apparent that the only overlapping traffic count locations between the two schemes are on the A614 Selby Road, north of North Common Road (Actual Traffic Count (ATC) 21 within **ES Volume I Chapter 13: Transport and Access [REP1-015]**

ExQ1	Respondent	Question	Applicant's Response
			assessment). Table 16 in **ES Volume I Chapter 13: Transport and Access [REP1-015]** shows that zero development trips would travel through ATC 21 daily, which resulted in a non-significant effect at this location. The Tween Bridge Solar Farm PEIR chapter also references the corresponding count location as having a non-significant effect. Therefore, it can be concluded that the cumulative impacts are not significant.
5.	**Landscape and visual, glint and glare, good design**		
1.5.1	Applicant	Please explain, with reference to the Planning Inspectorate's advice on good design, how you have considered opportunities to demonstrate good design in terms of siting of the various elements of the proposed development in order to mitigate their effects on the landscape. Please explain how you propose to ensure that both the panels and associated development will contribute to the quality of the area.	The Planning Inspectorate's advice notes that good design stems from an iterative process. This has formed a key part of the Scheme's design process, which has also evolved through multidisciplinary input and stakeholder consultation. In terms of siting Solar PV Infrastructure, the following design commitments have been adopted across the Scheme: • The Scheme has been sited between two robust physical features within the landscape, the East Coast Mainline and the disused railway, which contain it from the surrounding environment. • Offsets from the River Went, which is considered to be a landscape more sensitive to change.

ExQ1	Respondent	Question	Applicant's Response

- Solar PV Infrastructure has been sited within the existing field pattern to retain the existing landscape structure and scale as far as possible.
- The height of Solar PV Panels (up to 3.5m) has been considered in relation to surrounding vegetation and future management practices to maximise screening potential.
- Larger infrastructure, including the On-Site Substation and BESS Area, have been located away from the most sensitive receptors, such as residents, and maximises the benefit of existing screening.
- Existing access points and tracks have been used throughout the Scheme, where feasible, to minimise the loss of existing vegetation.
- The Operations and Maintenance Hub will be re-purposed from an existing agricultural building to integrate it into the surrounding landscape.

With reference to the Planning Inspectorate's good design advice, the implications of good design span the entire project, including considerations on climate, people place and value. Accordingly, the Scheme contributes to nature recovery through the creation of new habitats and ecological corridors, helping to create a more joined-up green infrastructure network. Similarly, climate resilience is

ExQ1	Respondent	Question	Applicant's Response
			improved through the diversification of species proposed to be planted throughout the Scheme, whilst being in keeping with the prevailing local landscape character. The Scheme's design has evolved through incorporating offsets and mitigation in proximity to local settlements, roads and Public Rights of Way. In some instances, bespoke interventions have been designed to respond to the extent and character of individual views.
1.5.2	Applicant	ES Chapter 10: Landscape and Visual Amenity [APP-062], paragraph 10.5.3 states that professional judgement has been used to assess residents' views, aided by aerial photography and field work from the surrounding area. How confident is the applicant that this has sufficiently captured the likely significant effects of the proposal on views from residential properties within the order limits. Please provide an explanation.	There are no residential properties within the Order Limits, however, there are several in proximity. For most residential visual receptors, PRoW and public roads pass in proximity. This allowed for fieldwork to be undertaken and therefore a high degree of confidence that the assessment of views from residential receptors is representative and accurate. Where this is not the case, for example with properties on the northeastern edge of Fenwick, access to the land directly behind the residential curtilage was obtained to inform the assessment of visual impact, again leading to a high degree of confidence in the accuracy of the results. With reference to **ES Volume III, Appendix 10-2: Landscape and Visual Impact Assessment Methodology** (Revision 01) **[EN010153/APP/6.3]** a more detailed examination of views from residential properties would be undertaken where the highest

ExQ1	Respondent	Question	Applicant's Response
			significance of effect level (i.e. major adverse) is identified for residential receptors at Year 15 of operation and maintenance. No such instances were identified; however, a significant effect (moderate adverse) was identified at Jet Hall Farm at Year 15 during Winter.
1.5.3	Applicant	ES Chapter 10: Landscape and Visual Amenity [APP-062], paragraph 10.4.26 explains that a range of representative viewpoints (VPs) have been provided for photomontages to demonstrate a variety of views and receptors. Do these cover all VPs where significant effects are identified?	Yes, every visual receptor that experiences a significant effect during operation and maintenance has a representative viewpoint in proximity and an associated photomontage produced during Winter Year 1 and Winter Year 15. Glebe House, which is located along the Grid Connection Corridor, experienced a significant effect during construction only and therefore a photomontage was not produced.
1.5.5	Applicant	ES Chapter 10: Landscape and Visual Amenity [APP-062], paragraph 10.4.33(f) explains that the working area for installation of the Grid Connection Cables is anticipated to be 30m. Both this paragraph and the ODPS [APP-193] also include wording which suggests that it could be greater than 30m. Please explain whether the 30m working area represents a maximum parameter and if so, please amend the ODPS accordingly. If not, please explain how the assessment has captured how the worst-case scenario?	The working width of the corridor will be up to a maximum of 30 metres. However, this width may vary in certain locations—for example, it may be wider at access points to allow for vehicle turning, or narrower where the corridor crosses features such as hedgerows. Changes have been made to page 12 of the **ODPS** (Revision 01) **[EN010152/APP/7.4]** to make this clearer. The assessment has accounted for the worst-case scenario in terms of working width. The assessment within the ES has considered all areas within the Order Limits, including the full extent of the Grid Connection Corridor, which has an

ExQ1	Respondent	Question	Applicant's Response
			average width of 100m to provide flexibility, even though the actual working width required for installation is anticipated to be significantly narrower.
1.5.6	Applicant	Please provide an assessment of the site as a landscape receptor as referred to in 12.4 of the draft statement of common ground (SoCG) [REP1-032] with CDC.	An assessment of the Site as a landscape receptor was provided to City of Doncaster Council prior to Deadline 1. This has been updated within **ES Chapter 10: Landscape and Visual Amenity** (Revision 01) **[EN010152/APP/6.1]** and submitted at Deadline 2.
1.5.7	Applicant/City of Doncaster Council	The ExA notes that an updated representative viewpoint plan is currently being agreed [REP1-032]. The parties are asked to work together to agree a plan for submission at deadline 2.	The updates to **ES Volume II, Figure 10-9 Representative Viewpoint Locations [EN010152/APP/6.2]** (Revision 01) and **ES Volume II, Figure 10-10 Viewpoint Photography [EN010152/APP/6.2]** (Revision 01) have been agreed with City of Doncaster Council and are submitted at Deadline 2.
1.5.9	Applicant	Please provide the technical note describing how the proposed development has responded to the landscape strategy for the relevant LCAs (as referred to in the draft SoCG with CDC (ref 12.2) [REP1-032].	The technical note requested by the Examining Authority has been submitted at Deadline 2 [**EN010152/APP/8.23**].
Glint and Glare			
1.5.10	Applicant	ES Appendix 14-2: Glint and Glare Assessment [APP-181]. Please provide further details with regards to the type of aircraft that use Church Farm Airfield and the frequency which aircraft arrive/ depart.	Church Farm Airfield has been assessed as still fully operational due to the potential for this airfield to operate again in the future. It is currently not used however if it was still functional, the type of aircraft that would be expected to use the Church Farm

ExQ1	Respondent	Question	Applicant's Response
			Airstrip, given it is a small grass strip, include small, light aircraft and microlight aircrafts. These aircraft would not be setting off from another airfield early enough (in the dark) to land at Runway 08 of Church Farm during the time of predicted yellow glare impacts (6:45am during June and July). The frequency with which aircraft arrive and depart the airfield cannot be ascertained, as it appears that the airfield has been out of use since 2016, which has been concluded based on Google Earth imagery. However, based off the type of aircraft that would utilise the airfield it would be likely that during the day in the summer would be the time of most frequent use, with the occasional use during the winter. This would be outside the predicted time of yellow glare upon Runway 08 (6:45am in June and July). Furthermore, given the approach into Runway 08 has a treeline directly before the area in which aircraft land on Runway 08, pilots will most likely be using the Runway 26 approach which has no glare issues.
1.5.11	Applicant	Please provide any supporting evidence for the magnitude of impact criteria used in paragraph 4.27 of ES Appendix 14-2: Glint and Glare Assessment [APP-181].	The impact criteria for residential receptors have been based off the accepted Shadow Flicker impact classifications of a high impact occurring when there is either 30 hours per year or 30 minutes per day, as

ExQ1	Respondent	Question	Applicant's Response
			set out in the Update of UK Shadow Flicker Evidence Base[1]. The impact criteria set out within the **ES Volume III Appendix 14-2: Glint and Glare Assessment** (Revision 02) **[EN010152/APP/6.3** has been used on numerous solar projects totalling over 3GW across the UK and Ireland to date. Projects include the Longfield Solar Farm, East Yorkshire Solar Farm and Gate Burton Energy Park NSIPs, where the impact criteria set out was accepted by the Examining Authority. Furthermore, this impact criteria has stood up to the test of numerous peer reviews that have been completed by councils across the UK and Ireland.
1.5.12	Applicant	The following paragraphs within ES Appendix 14-2: Glint and Glare Assessment [APP-181] state that the photograph taken is representative enough to confirm there is vegetation sufficient to screen views of the solar site. The ExA question whether these photographs are representative and request the following paragraphs and photographs are reviewed: a) Paragraph 6.23 states that the photograph taken for Receptor 28 is representative enough to confirm there is vegetation sufficient to screen all views of the solar site to the west and intervening buildings are sufficient to screen from the east. Given the positioning of the red dot, and the photograph	**Annex N of ES Volume III Appendix 14-2: Glint and Glare Assessment** (Revision 02) **[EN010152/APP/6.3]** has been updated, and submitted at Deadline 2, to reflect the comments received from the Examining Authority. Updated photographs for Receptors 28 and 65–69 have been included to provide more representative views of the Solar PV Site from these receptor locations. These revised images offer improved visual confirmation that existing vegetation and built form sufficiently screen views of the Solar PV Site where glint and glare could potentially occur.

[1] https://assets.publishing.service.gov.uk/media/5a79770bed915d0422068aa3/1416-update-uk-shadow-flicker-evidence-base.pdf

ExQ1	Respondent	Question	Applicant's Response
		provided, do you consider that a more representative view could be provided closer to the receptor and what they might experience. b) Paragraph 6.35 states that the photograph taken for Receptors 65 and 66 is representative enough to confirm there is sufficient vegetation to screen the solar PV site from receptors to the west. Do you consider this photograph to be representative of the view to the north west when it is taken looking southwards? c) Paragraph 6.37 says the first photograph is representative of views to the west for Receptors 67-69. Do you consider this photograph and the direction it is taken is representative of showing views to the west to demonstrate no impact when there is a potential of glint and glare impact on these residential properties? d) Paragraph 6.77. Please confirm whether this relates to the driver receptors that are listed in Table 6-2 and the images given in Annex N for driver receptors or to residential receptors. e) Paragraph 6.116 does not appear to correlate to the subject it should be discussing.	Accordingly, the supporting text in paragraphs 6.23, 6.35, and 6.37 of **ES Volume III Appendix 14-2: Glint and Glare Assessment** (Revision 02) **[EN010152/APP/6.3]** has been updated to align with the revised photographs in Annex N, and submitted at Deadline 2. As stated in the updated assessment, the conclusion remains that there will be no impacts from glint and glare at these receptor locations. Paragraph 6.77 of **ES Volume III Appendix 14-2: Glint and Glare Assessment** (Revision 02) **[EN010152/APP/6.3]** specifically relates to road receptors. It explains the photographs used within Annex N for road receptor locations. Each receptor type is supported by a corresponding explanatory paragraph, which outlines the relevant images provided in Annex N: • Residential Receptors: Paragraph 6.7 • Road Receptors: Paragraph 6.77 • Rail Receptors: Paragraph 6.84 • Bridleway Receptors: Paragraph 6.116 The reference to a "train driver" in Paragraph 6.116 was a typographical error and has been removed in the updated **Volume III Appendix 14-2: Glint and Glare Assessment** (Revision 02)

ExQ1	Respondent	Question	Applicant's Response
			[EN010152/APP/6.3]. This paragraph correctly relates to bridleway receptors, and the text has been revised accordingly.
6.	**Biodiversity (including Habitats Regulations Assessment (HRA) and Biodiversity Net Gain)**		
1.6.3	Applicant	ES Chapter 8: Ecology paragraph 8.7.5 and Table 8-5 [APP-060]. Please confirm why if candidate Local Wildlife Sites are referred to in Chapter 8: Ecology, the candidate SSSI has not been discussed or assessed within that chapter or the fLEMP [REP1-029].	Non-statutory sites such as Local Wildlife Sites are typically designated by a combination of local authorities, Wildlife Trusts and other local conservation groups. The Applicant refers to candidate Local Wildlife Sites in Section 8.7.7 and Table 8-6 of the **ES Volume I Chapter 8: Ecology [APP-060]** as details of these are generally available through the relevant local biological or environmental records centre upon purchase of a data search, as described in Section 8.4.10 of **ES Volume I Chapter 8: Ecology [APP-060].** In this instance, details of candidate Local Wildlife Sites were provided by Doncaster Local Records Centre (DLRC). Sites of Special Scientific Interest (SSSIs) are notified by Natural England. As set out in The Applicant's responses to Relevant Representations at Deadline 1 **[REP1-031]**, through consultation with Natural England it was not 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 was not undertaken. However, the assessment presented in **ES Volume I Chapter 8: Ecology**

ExQ1	Respondent	Question	Applicant's Response
			[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, potential impacts to the relevant component features, i.e., breeding bird assemblages, are assessed (where located within a potential zone of impact of the Scheme, including within the Order limits)
1.6.4	Applicant	fCEMP Table 3-6 [REP1-019] says that storage of materials and any washing, mixing or refuelling must take place in agreed allocated areas at least 5m from the edge of the root protection area of retained trees. However, point (j) on page 31 states that there would be an undeveloped buffer of at least 15m from individual trees. Please explain the differences between these distances for tree protection. Please explain how the undeveloped buffers would be demarcated.	The proposed undeveloped buffer of 15m relates to a measurement from the tree itself, rather than the edge of the RPA. The 15m offsets from trees described in point (j) on page 31 of the fCEMP is a general design guideline/aspiration used to inform the Scheme layout in early stages when specific tree data is not available. This is then superseded by tree survey data, the recorded RPAs and more detailed information included within the **Arboricultural Impact Assessment [APP-167 to APP-168]**. The additional 5m from the edge of the RPA, as outlined Table 3-6 of the **Framework CEMP** (Revision 02) **[EN010152/APP/7.7],** is an additional measure to manage any risk of spillage/runoff that could enter the RPA. The **Framework CEMP** (Revision 02) **[EN010152APP/7.7],** has been updated and at Deadline 2 to clarify this issue.

ExQ1	Respondent	Question	Applicant's Response
			The methodology for protection of trees is correctly identified in Section 7.3.7 of the Framework Landscape Environmental Management Plan (LEMP) **[REP1-029],** which states *"7.3.7 During construction the retained hedgerows, woodland and trees will be protected in accordance with a detailed Tree Protection Plan and Arboricultural Method Statement, as required by the Framework CEMP* [APP-196]. *The measures will include the use of clearly defined stand-offs (secured with temporary protective fencing), managing the structure and integrity of the retained vegetation and the soil upon which it relies, and undertaking any pruning outside of the bird nesting season."*
1.6.5	Applicant	ES Appendix 8-5: Hedgerow Report [APP-150]. The ExA notes that ES Chapter 8: Ecology [APP-060] states that 3.99km of hedgerow are proposed to be lost. Please: a) signpost where in the ES the information showing the extent of each hedgerow to be removed can be found (and the reason why that hedgerow is to be removed). b) provide details as to what avoidance measures were sought before identifying its removal and what mitigation measures have been provided and how this is secured as a maximum parameter. c) outline what compensation has been provided.	The Applicant has provided a response to each of the points below: a) The predicted extent of hedgerow removal is shown in Figure 8-5-2 of **ES Volume III Appendix 8-5: Hedgerow Report [APP-150].** b) The detailed surveys undertaken by the Applicant to determine the presence and distribution of biodiversity across the Order limits, as detailed in **ES Volume I Chapter 8: Ecology [APP-060],** have informed the indicative layout of the Scheme, including the location and routing of accesses and cables, and sought to avoid and minimise vegetation removal where practicable. As outlined in Table 3.5 of the **Framework CEMP [REP1-019]** "*the layout of the Scheme will use*

ExQ1	Respondent	Question	Applicant's Response
			existing farm tracks and field openings as the preferred routes for construction access, minimising loss of hedgerows, where practicable". To facilitate access, certain accesses have necessitated the removal of sections of existing hedgerow to ensure the safe visibility for vehicles using these accesses. Access proposals are contained in the Appendix A of the **Framework Construction Traffic Management Plan [APP-206/207].** No hedgerows have been removed to accommodate solar PV arrays. c) As described in the **Framework LEMP [REP1-029]** the Scheme will both enhance existing hedgerows, by 'gapping up' and create new hedgerows. The locations of this are shown in **Annex A Indicative Landscape Masterplan of the Framework LEMP [REP1-029]**. The **Biodiversity Net Gain Assessment [REP1-023]** provides details of the post-development habitats in Section 3.2. This includes the provision 10.10km of habitat creation and 20.53km of hedgerow enhancement.
1.6.7	Applicant	Trees and Woodland. Please: a) confirm the number of trees/ tree features which would be subject to an incursion into their Root Protection Area. Paragraph 4.2.7 of the fLEMP [REP1-029] states this is 19 whereas page 33 of the fCEMP [REP1-019] says it would be 17. b) explain how the proposed management and monitoring of Ash and Elm trees as recommended in	The Applicant has provided a response to each of the points below. a) Table 7 of the **Arboricultural Impact Assessment [APP-236 and APP-240]** and Section 4.2.7 of the **Framework LEMP [REP1-029]** confirms that 19 tree features are subject to incursions within Root Protection Areas. The **Framework CEMP** (Revision 02) **[EN010152/APP/7.7]** has been updated at Deadline 2 to address this.

ExQ1	Respondent	Question	Applicant's Response
		paragraphs 3.2.10 and 3.2.13 of the Arboricultural Impact Assessment [APP-167] would be secured. c) explain why planted trees and scrapes are not included within the post construction monitoring programme in section 6 of the fLEMP [REP1-029].	b) The monitoring of ash and elm trees will be secured via the **Framework Construction Environmental Management Plan** (Revision 02) **[EN010152/APP/7.7],** which states that the arrangements for site monitoring and supervision will be detailed in the Arboricultural Method Statement as part of the detailed CEMP. c) This is an oversight in the text and the **Framework LEMP** (Revision 02) **[EN010152/APP/7.13]** has been updated accordingly and submitted for Deadline 2.
1.6.8	Applicant	The Burnet Heritage Trust have commented [RR-011] there are a number of species that have not been surveyed or included within ES Appendices 8-7 [APP-152 and APP-153] and 8-8 [APP-154] as follows: • Table 4 of ES Appendix 8-7 states that Marsh Harrier is not within the order limits. As Marsh Harrier is identified within Annex 1 Birds of Conservation Concern (BoCC) Amber list, please confirm survey distance for this species given the methodology set out within Section 3 of ES Appendix 8-7 and given the ecological protection afforded this species. • Grasshopper Warbler have not been surveyed. Given this species is a Species of Principal Importance (SPI) and is listed on the BoCC Red list, please confirm the extent of the surveying distance	The Survey Area for breeding bird surveys is defined in Section 3 of **ES Volume III Appendix 8-7 Breeding Bird Report [APP- 152]**and for non-breeding birds in Section 3 of **ES Volume III Appendix 8-8: Non-Breeding Bird Report [APP-154]** and summarised in Table 8-1 of **ES Volume I Chapter 8: Ecology [APP-060].** This is summarised for breeding birds as follows: *'For the general breeding bird assemblage, the Survey Area is defined as the land within the Order limits and to a maximum of 50 m from the Order limits. For species of greater conservation value and/or higher sensitivity, e.g. those listed on Schedule 1 of the WCA and sensitive to potential noise or visual disturbance, where any such species were recorded, the survey area was extended up to 200 m from the Order limits'*

ExQ1	Respondent	Question	Applicant's Response
		for this species given the methodology set out within Section 3 of ES Appendix 8-7. • Marsh Warbler have not been surveyed. Please confirm if this species was surveyed and if not, why not. • Garganey have not been surveyed. Please confirm if this was surveyed and if not, why not.	For non-breeding (wintering and passage) birds as follows: '*The land within the Order limits and to a maximum of 500 m from the Order limits.*' All bird species, including Marsh Harrier, Grasshopper Warbler, Marsh Warbler and Garganey were included within the scope of the surveys and, where present, recorded. In addition, the extensive data bases, such as those highlighted by the Burnet Heritage Trust (BHT) were reviewed to provide additional information from both within the Survey Areas and outwith. The Applicant has provided a detailed response to the BHT Relevant Representation at Deadline 1 **[REP1-031]**. A response to each of the specific species is provided below. Marsh Harrier – Given the species is listed on Schedule 1 of the WCA (and therefore protected from disturbance whilst breeding) the Survey Area for the species was up to 200m from the Order limits. The Applicant recorded foraging Marsh Harrier during non-breeding bird surveys, as presented in **ES Volume III, Appendix 8-8: Non-Breeding Bird Report [APP-154]**; however, the species was not recorded during breeding season surveys. The species has, therefore been assessed as part of the non-breeding bird assemblage. 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

ExQ1	Respondent	Question	Applicant's Response
			abundance of prey) and not prohibit potential future breeding in the wider area. Grasshopper Warbler – the Survey Area for the species included a minimum of 50m from the Order limits, and where accessible and individuals where audible, up to 200m beyond that. The species was not recorded during breeding bird surveys undertaken by the Applicant; however, as presented in Table 4 of **ES Volume III Appendix 8-7 Breeding Bird Report [APP-152]** is acknowledged as being present in the wider area. Marsh Warbler – the species is listed on Schedule 1 of the WCA and as such protected from disturbance whilst breeding. The Survey Area for the species included a minimum of 50m from the Order limits, and where accessible and individuals where audible, up to 200m beyond that. The species was not recorded during breeding bird surveys undertaken by the Applicant. However, it is noted that the species has been present at Topham in 2023 and 2024. The Applicant has provided a detailed response in **[REP1-031]**, but in summary, 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. Garganey – the species is listed on Schedule 1 of the WCA and as such protected from disturbance whilst breeding. The Survey Area for the species included a minimum of 50m from the Order limits,

ExQ1	Respondent	Question	Applicant's Response
			and where accessible, up to 200m beyond that. There is no breeding habitat for Garganey within the Order limits, with breeding likely to be associated with wetlands north of Topham. The species was not recorded during surveys undertaken by the Applicant. It should be noted that prior to commencement of any works, surveys of both breeding and non-breeding birds will be undertaken to establish whether the distribution of birds has changed, and any specific mitigation measures are required, such as to avoid disturbance by species listed on Schedule 1 of the WCA. This is secured through the **Framework CEMP [REP1-019]** and via Requirement 11 of Schedule 2 to the **Draft DCO [REP1-005].**
1.6.9	Applicant	The Burnet Heritage Trust relevant representation [RR-011] raises concerns that inclusion of fields SE6 and SE7 would result in a disproportionally negative effect on biodiversity including the isolation of broadleaf woodland from adjoining woodland areas. Please explain the rationale for inclusion of fields SE6 and SE7 and in particular: a) how it represents good design? b) the ecological impacts that result from the inclusion of these fields. Please also explain how the removal of these fields would impact on the significant effects identified in	The Applicant provides a response to both points below. a) and b) The placement of solar PV in fields SE6 and SE7 will not cause any isolation of existing habitats in adjoining areas or in connectivity for wildlife moving between areas and across the wider landscape. Both fields are currently pasture grassland, with the UKHabitat classification type being 'Other neutral grassland'. This grassland type will be retained and continue to be present throughout operation.

ExQ1	Respondent	Question	Applicant's Response
		the ES Chapter 8: Ecology [APP-060] (including residual significant effects) and how their removal would affect the likely generation capacity of the project.	As set out in **ES Volume I Chapter 8: Ecology [APP-060]** and the **Framework LEMP [REP1-029]** the design parameters include development set-backs of at least 15m from all woodland. As such, undeveloped buffers around woodlands and other boundary features which will be subject to habitat creations and enhancements, such as species-rich grassland creation and hedgerow improvements, will mean there will be no isolation of habitats outside the Order limits. These embedded design parameters will strengthen habitat connectivity and further facilitate wildlife movement. No significant adverse effects on biodiversity have been identified in **ES Volume I Chapter 8: Ecology [APP-060]** and the removal of fields SE6 and SE7 would not alter these conclusions. Whilst in plan view the fields may appear as removed from the core extent of the Order Limits, they are well contained by existing vegetation along the disused railway line and woodland to the north of Bungalow Farm. This makes this part of the Scheme visually imperceptible with the exception of glimpsed views through a field entrance for people driving along the 60mph West Lane. Therefore, it was established that no additional mitigation was required during the design process and that their use for solar PV was appropriate from a landscape and visual perspective.

ExQ1	Respondent	Question	Applicant's Response
			By removing PV from fields SE6 and SE7, there would a reduction in generating capacity by 5.65 MWp. This would be equivalent to a small commercial solar farm or 1,400 typical UK 4KWp residential rooftop solar systems.
1.6.10	Applicant	On 7 April 2025, Natural England published new 'standing advice' for beavers. It also updated many of its suite of standing advice for protected species namely: Great Crested Newts, bats, reptiles, fish, freshwater pearl mussels, wild birds, otters, protected wild plants, fungi and lichens, invertebrates, badgers and natterjack toads. The standing advice is a material planning consideration. Please comment as to whether these changes affect any of the conclusions of assessments carried out as part of the ES.	The Applicant has reviewed Natural England's updated standing advice for all species and can confirm that it does not affect the conclusions or assessments presented in the ES.
1.6.11	Applicant	Hedgerow Report [APP-150] Figure 8-5-1. Hedgerow H83 and H96 run alongside footpath Fenwick 16 (Haggs Lane). Haggs Lane is identified as the inbound access route for construction workers. Please signpost where within this report or the ES protection measures are proposed for these hedgerows during the construction phase given the need to accommodate both traffic and rights of way users along Fenwick 16.	Neither Hedgerow H83 nor H96 is categorised as 'important' under the Hedgerow Regulations 1997, as set out in the **Hedgerow Report [APP-150].** In this location, it has been necessary to incur upon the standard 5m buffer zone that is typically applied to all other hedgerows. This deviation has been required due to spatial constraints along Haggs Lane (Fenwick 16), which is proposed as a construction access route. The layout must accommodate construction traffic, maintain the public right of way, and ensure sufficient separation from the adjacent watercourse.

ExQ1	Respondent	Question	Applicant's Response
			As a result, encroachment on the buffer in this area was unavoidable. Nonetheless, appropriate construction-phase protection measures will be implemented in line with the **Framework CEMP [REP1-019],** to ensure that hedgerows are not damaged during works. These will be confirmed in detail in the final CEMP, secured via Requirement 11 of Schedule 2 to the **Draft DCO [REP1-005],** in consultation with the contractor and relevant stakeholders.
1.6.12	Applicant	Aquatic Report [APP-151] paragraph 3.1.28 states that Nuttall's waterweed is no longer listed in Schedule 9 of the Natural Environment and Rural Communities Act 2006 but is listed in the Invasive Alien Species (Enforcement and Permitting) Order 2019. The fCEMP [REP1-019] Table 3-3 refers to a Biosecurity Plan being produced prior to construction and pre-construction surveys being undertaken. Please confirm a) Whether these Biosecurity Plan and pre-construction surveys would include invasive species listed in the Invasive Alien Species (Enforcement and Permitting) Order 2019. This question also relates to curly waterweed (paragraph 3.1.29) and New Zealand mud snail (paragraph 3.1.30). b) that the Biosecurity Plan would provide adequate details of long-term monitoring i.e. frequency and season of monitoring visits and the duration before eradication can be confirmed.	The Applicant has responded to each of the points in turn. a) The Biosecurity Plan and pre-construction surveys will include invasive species listed in the Invasive Alien Species (Enforcement and Permitting) Order 2019, including Nuttall's waterweed and curly waterweed. New Zealand mud snail is not listed in any statutory legislation; however, good practice biosecurity measures would ensure that its spread is avoided. b) There are statutory constraints regarding the potential spread of Nuttall's waterweed, and therefore mitigation will be required during the construction and decommissioning phases to prevent their spread. The Biosecurity Plan will provide information on pre-construction surveys required and monitoring information during the operation and maintenance phase.

ExQ1	Respondent	Question	Applicant's Response
			The focus of the Biosecurity Plan will be to control the potential spread of aquatic invasive species; however, the eradication of established Invasive Non-Native Species (INNS) locally is unlikely and disproportionate given the likelihood of immediate recolonisation from adjacent habitats. The Plan will include the timing and frequency of monitoring during the operation and maintenance phase, aligned with ecological good practice and seasonal constraints for aquatic species.
1.6.13	Applicant	ES Chapter 7: Heritage [REP1-011] paragraph 7.4.2. This paragraph states that if the grid connection line drop was utilised, this would comprise below ground cables from the substation to a new cable compound at base of overhead line tower in field SE2. Please provide details on what mitigation and protection measures, over and above those detailed in the fCEMP [REP1-019] page 29 "Clearance or damage …. associated species", would be provided for the protection of Bunfold Shaw ancient woodland from the installation of the below ground cables. What protection measures would be in place for Bunfold Shaw from activities that would take place within the new cable compound at the base of the overhead line tower.	The Applicant can confirm that if the grid connection line drop option were to be utilised, then all works associated with this, including new cable compound and installation of below ground cables, would be over 100m from Bunfold Shaw. As such, the protection measures set out in the **Framework CEMP [REP1-019]** are still adequate.
1.6.14	Applicant	fLEMP paragraph 4.2.3 [REP1-029]. This paragraph says that updated surveys would be carried out	The updated surveys to be undertaken pre-construction would establish whether there had

ExQ1	Respondent	Question	Applicant's Response
		preconstruction. Please explain what actions would take place following the completion of the surveys (including who they would be provided to and what other documents may then require updating before submission of final documents).	been changes in species distributions which would influence detailed design or require specific mitigation actions. These surveys would inform the content of the final detailed LEMP and CEMP or whether specific licences may be sought from statutory consultees. As set out in Requirements 6 and 11 of Schedule 2 to the **Draft DCO [REP1-005]**, no part of the authorised development may commence until the relevant management plan has been submitted to and approved by the relevant local planning authority.
1.6.15	Applicant	fLEMP paragraph 5.2.14 [REP1-029]. Where setbacks of 10m from watercourses cannot be provided for open cut trenching, what precautionary measures would be provided (page 37 of the fCEMP [REP1-019]) to safeguard habitats in those locations.	Where a 10m setback from watercourses cannot be maintained for open cut trenching, precautionary measures to safeguard habitats and species will be identified during the detailed design stage, once the specific risks in each location are understood. These measures will be set out in the detailed CEMP, which will be developed in consultation with the appointed contractor and agreed with the relevant local planning authority. As detailed design has not yet occurred, it is not possible to identify specific mitigation measures at this stage. However, the Applicant is committed to ensuring that appropriate protections will be put in place to avoid adverse effects on sensitive habitats. Examples of measures that may be considered include:

ExQ1	Respondent	Question	Applicant's Response
			• Silt fences or straw bales to intercept sediment runoff. • Temporary bunds or geotextiles to prevent erosion. • Limit working area and keep footprint minimal. • Avoid trenching during wet weather; reinstate ground quickly. • Use settlement tanks for water pumped from trenches. • Conduct ecological checks before works; install temporary fencing.
1.6.16	Applicant	fLEMP paragraph 5.3.2 [REP1-029]. Please explain what measures would be explored at the locations detailed in bullet points a - c within paragraph 5.3.2 as these measures are not clearly shown on Figure 2-3 Indicative Site Layout Plan [APP-74] or in Appendix A of the fLEMP.	**Framework Landscape and Ecological Management Plan (FLEMP)** (Revision 02) **[EN01052/APP/7.13]** has been updated to provide greater clarity on this point. In summary, the southern edge of Fields NW3 and NW4 will have a native scrub and tree area, the southern edge of Field SE3 will have a new hedgerow with hedgerow trees, and the southern edge of Field SW12 will gap up existing hedgerows and introduce new hedgerow trees. All of these interventions will use mature planting stock, such as ready hedges and larger specimen trees to reduce the time between planting and mitigation reaching its required height.

ExQ1	Respondent	Question	Applicant's Response
1.6.17	Applicant	ES Chapter 8: Ecology Table 8-12: Determination of Potential Impacts and Effects on Important Ecological Features – Habitats and Species (page 8-129 Open Mosaic Habitat (OMH) on Previously Developed Land (PDL) Priority Habitat) [APP-060] and fLEMP paragraphs 7.3.18 – 7.3.23 [REP1-029]. These documents say there is an area of PDL which has been assessed as OMH which is a Habitat of Principal Importance where much of the value is within the topsoil but that the site was not accessible for surveying. The documents go on to say it would be temporarily disturbed to facilitate the installation of cables and that the substrate that is removed would be retained during the works period and infilled once the Grid Connection Cables are in place. The documents say that the infilling of the cable trench would disturb the seed bank and create new opportunities. The paragraphs say that precautions must be taken during the works period not to flush the habitat away with any nutrient rich runoff from nearby habitats. Please explain what precautionary measures would be adopted and please direct us to where these details are contained within the fCEMP [REP1-019] and Commitment and Mitigation Register [APP-189]. If it is recognised that there would be disturbance of the seed bank how is this reflected within the BNG metric?	The **Framework Soil Management Plan** (Revision 01) **[EN010152/APP/7.10]** outlines measures that will be taken to protect topsoil, including ecologically important topsoil**.** As outlined in Paragraph 4.6.4 "*Ecologically important soils, for example woodland or hedgerow soils, must be stripped and stored separately to ensure the seedbank is retained and not mixed with neighbouring agricultural soils. These stockpiles must be appropriately marked out and clearly signed to ensure they are easily identifiable at restoration, as specified in location-specific construction method statements*". For the purposes of the BNG Assessment **[REP1-023]** it has been assumed that area of potential OMH to be impacted during construction will be lost and this is reflected in the metric outputs.
No Significant Effects Report			

ExQ1	Respondent	Question	Applicant's Response
1.6.20	Applicant	The ExA notes that Thorne Moor Special Area of Conservation (SAC), Thorne and Hatfield Moors Special Protection Area (SPA) and Hatfield Moor SAC have been scoped in for the assessment of construction and decommissioning effects within the No Significant Effects Report (NSER) [REP1-025], however, these designated sites are not included in the list of relevant habitat sites in Table 6. Please update Table 6 to reflect all relevant habitat sites included in the assessment.	Table 6 of the **No Significant Effects Report (NSER)** (Revision 03) **[EN010152/APP/7.12]** has been updated to include reference to Thorne Moor Special Area of Conservation (SAC), Thorne and Hatfield Moors Special Protection Area (SPA) and Hatfield Moor SAC and has been resubmitted at Deadline 2.
1.6.21	Applicant	Footnote 7 of the NSER [REP1-025] refers to Skipwith Common SAC. The ExA notes that Skipwith Common SAC was not identified in paragraph 4.2.6 as being within 20km of the proposed development and has not been illustrated in Figure 2 or assessed in the NSER. Please clarify the status of the Skipwith Common SAC in relation to the proposed development. For example, if Skipwith Common SAC is located within 20km of the application site, clear reasoning should be provided to explain why it has been scoped out of further assessment. However, if its inclusion in the NSER is an error, then the applicant should submit a revised version of the NSER which doesn't make reference to the Skipwith Common SAC.	The reference to Skipwith Common was included in error and was removed from the **NSER** (Revision 03) **[EN010152/APP/7.12]** prior to the acceptance of the application, following a query from the Planning Inspectorate (PINS) in December 2024. The version of the NSER submitted at that time had already had the reference to Skipwith Common deleted. In any event, the NSER has since been further updated at Deadline 2 to address comments from Natural England, and the Applicant can confirm that Skipwith Common is no longer referenced.
Biodiversity Net Gain			
1.6.22	Applicant	Biodiversity Net Gain (BNG) Assessment [REP1-023]. The BNG assessment does not provide the	The Applicant can confirm that a copy of the Metric calculator and the associated data files underpinning

ExQ1	Respondent	Question	Applicant's Response
		data files that underpin it. Please provide a copy of the data files that support this document.	the **Biodiversity Net Gain (BNG) Assessment** (Revision 02) **[EN010152/APP/7.11]** will be submitted at Deadline 2.
1.6.24	Applicant	Natural England in its response to deadline 1 [REP1-052] have commented that the biodiversity baseline includes all land within the order limits to present a 'worst-case scenario' approach. The applicant states [REP-031] that a deviation from the TCPA 1990 methodology is being applied in relation to the grid connection corridor to allow for flexibility in the design route. Please confirm if all the order limits for the solar PV site have been used as part of the baseline within the BNG metric and approach. Please confirm how habitat below the solar panels are being recorded for BNG.	All the order limits for the solar PV site have been included within the assessment. The approach of adjusting the order limits has only been applied for the cable route. The approach for under panel habitats has been discussed in the **BNG Assessment** (Revision 02) **[EN010152/APP/7.11]**, Section 2.9.1, assumption b: "*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 take into account the Solar PV Panel and supporting infrastructure.*" *"In some areas of the Site where Solar PV Panels are proposed, areas of 'Grassland – Other neutral grassland' were found to be present. It is planned that these areas of grassland will be retained and/or enhanced as much as viable, with some habitat loss expected to allow for the same assumption of 5% of the land being categorised as 'Urban – Developed land; sealed surface' to take into account Solar PV Panels and supporting infrastructure."*

ExQ1	Respondent	Question	Applicant's Response
			The Applicant's view is that the UKHab guidance on how to account for solar panels, i.e. considering all under panel habitat as 'Urban – Developed land; sealed surface', is not a fair reflection of the reality; as such, the above approach has been taken.
1.6.25	Applicant	The applicant's Response to Relevant Representations [REP1-031] confirms that the surveyors conducting the River Condition Assessment (RCA) were appropriately trained and accredited. Natural England have commented at deadline 1 that it is not clear within the BNG Assessment whether this has been followed. Please review the BNG Assessment [REP1-023] and update accordingly.	RCA's were undertaken by trained and accredited surveyors. The **BNG Assessment** (Revision 02) **[EN010152/APP/7.11]** has been updated to include mention of this and submitted at Deadline 2.
1.6.27	Applicant	Natural England response at deadline 1 [REP1-052] recommends that should the DCO be granted, appropriate surveys for OMH are undertaken to determine whether the habitat is in fact OMH as this may alter the results of the adherence to the trading rules. Please signpost where in the fCEMP [REP1-019] or fLEMP [REP1-029] further details of pre-construction surveys for OMH can be found.	Table 3-3 within the **Framework CEMP** (Revision 02) **[EN010152/APP/7.7]** has been updated to include specific reference to the requirement to survey open mosaic habitat. The updated Framework CEMP has been submitted at Deadline 2.
7.	**The water environment**		
1.7.2	Applicant	The ExA notes that not all of the modelled scenarios are represented on a figure. For example, paragraph 5.2.6 refers to the modelling for the River Went undertaking scenarios of 50% Annual Exceedance	The modelling approach has been updated following further discussions with the Environment Agency. The events used to inform **ES Volume III Appendix 9-3: Flood Risk Assessment** (Revision 01)

ExQ1	Respondent	Question	Applicant's Response
		Probability (AEP), 3.33% AEP, 1% AEP, 1% AEP plus 38% climate change and 1% credible maximum, however these do not all have a figure provided. The 1% AEP plus 38% climate change modelled scenario for the River Went is illustrated in Figure 9-3-1. Please provide figures for all modelled scenarios and update the FRA accordingly.	**[EN010152/APP/6.3]**, that have therefore been modelled include the 3.33% AEP, 1% AEP plus 38% climate change and the Credible Maximum Scenario. These scenarios have been updated within the figures referenced below and submitted at Deadline 2, being: • Figure 9-4 in ES Volume II **[EN010152/APP/6.2]**: which shows the 3.33% AEP as Flood Zone 3b • Figure 9-3-1 in the Flood Risk Assessment (FRA) **[EN010152/APP/6.3]**: shows the 1% AEP plus 38% climate change. • Figure 9-3-3 in the FRA **[EN010152/APP/6.3]**: shows the Credible Maximum Scenario. Further discussion on the modelling approach and modelling results has been included in Annex A of the FRA (hydraulic modelling report). The Credible Maximum has been used as a precautionary approach for all design and mitigation.
1.7.5	Applicant	In relation to the residual fluvial/tidal risk associated with flood defences, paragraph 5.4.1 of ES Appendix 93: Flood Risk Assessment [APP-158 & APP-159] acknowledges the residual risk of flooding to the solar PVC site is there was overtopping leading to a breach of the flood defences. However, the majority of the assessment and modelling appears to refer to a breach only, and as such it is not clear how overtopping has also been considered. Please explain how the risk of overtopping has been considered in the assessment.	The flood defences have been represented within the baseline River Went hydraulic model. Flood extents associated with the 3.33% AEP, 1% AEP plus 38% climate change and the Credible Maximum Scenario therefore take into consideration these defences and where these would naturally overtop if/when the level in the channel/floodplain reaches the crest level of the defence. The Lower Don 2018 defended model results have been used to assess flood risk from the River Don.

ExQ1	Respondent	Question	Applicant's Response
			During the 1% AEP plus 50% climate change event, the Solar PV Site is located outside of this modelled extent. As the defended scenario, the model takes into account flood defences and as above, these will naturally overtop if/when the level in the channel/floodplain reaches the crest level of the defence. Breach scenarios were then simulated for two locations of the River Don defences using specific 2D hydraulic models. The first was at the River Went outfall and the second further upstream on the River Don (between Thorpe in Blane and Krik Bramwith) where connectivity to the Site was possible. It is considered that a breach in these defences, especially the one upstream on the River Don, represents a more significant residual risk to the Order limits than the overtopping of flood defences and therefore the FRA has focused on the breach scenarios as the worst case. Results from this worst case modelling has in turn contributed to mitigation and design.
1.7.6	Applicant	Table 5-2 in the ES Appendix 9-3: Flood Risk Assessment [APP-158 and APP-159] proposes that solar PV panels will be at least 300mm above the design flood level and where located in the credible maximum scenario flood extent, solar PV panels will be raised 400mm above the flood level. Field stations are also proposed to be raised 300mm	The Solar PV Panels will be raised on Solar PV Mounting Structures and the Field Stations will be raised on concrete plinths (both of which are considered as part of the floodplain compensatory storage) as updated in Paragraphs 8.2.6 and 8.2.7 of **ES Volume III Appendix 9-3: Flood Risk Assessment** (Revision 01) **[EN010152/APP/6.3]**,

ExQ1	Respondent	Question	Applicant's Response
		above credible maximum scenario flood extent. However, the method that would be employed to raise panels and field stations to the appropriate height is not set out in the FRA. Please can the FRA be updated to include this information or signpost where this information can be found in the relevant application documents.	submitted at Deadline 2. References are also made to **ES Volume I Chapter 2: The Scheme [APP-054]** for more information.
1.7.7	Applicant	ES Chapter 9: Water Environment and ES Appendix 9-3: Flood Risk Assessment [APP-158 & APP-159] proposes that solar PV panels will be raised to ensure a 300m freeboard above the design flood level and where located in the credible maximum scenario flood extent, solar PV panels will be raised 400mm above the flood level associated with this extent. However, as noted by Environment Agency in its RR [RR-003], solar PV panels which fall within the design flood extent will also fall within the credible maximum flood extent and therefore the freeboard for all solar PV panels should be in line with the credible maximum scenario flood extent. Please review the relevant application documents and provide clarity regarding the proposed freeboard for the design flood and credible maximum scenarios.	Following discussions with the Environment Agency, it has been agreed that all Solar PV Panels will be raised 400 mm above the flood level associated with the Credible Maximum Scenario. Paragraph 8.2.6 of **ES Appendix 9-3: Flood Risk Assessment** (Revision 01) **[EN010152/APP/6.3]** has been updated to reflect this and submitted at Deadline 2.
1.7.8	Applicant	Paragraph 8.3.4 of ES Appendix 9-3: Flood Risk Assessment [APP-158 & APP-159] states that the on-site substation and BESS will be bunded to provide protection during the unlikely event of a breach of the flood defences. Please can the FRA	The On-Site Substation and BESS Area will be bunded to provide additional protection. This would comprise an earth bund around each asset with a height of up to 1.15m. This is 300 mm above the maximum flood depths during the River Don breach

ExQ1	Respondent	Question	Applicant's Response
		be updated to include details of the proposed bunding or signpost where this information has been provided in the relevant application documents.	scenario where depths reach up to 0.85m at the BESS Area. Flood gates will be installed within gaps of the bund i.e. where there is road access. Table 5-2 of **ES Appendix 9-3: Flood Risk Assessment** (Revision 01) **[EN010152/APP/6.3]** has been updated to reflect this and submitted at Deadline 2.
1.7.9	Applicant	Paragraph 7.3.2 of ES Appendix 9-3: FRA [APP-158 & APP-159] states that the grid connection corridor intersects existing flood defences along the Thorpe Marsh drain, and therefore the proposed development will require crossings of these defences. The ExA notes that the FRA assesses a breach scenario in respect of these defences. However, please explain the applicant's intention for these crossings including the proposed methodology and the assessment of any impacts of direct damage, vibration or other disturbances that may affect the integrity of these defences.	As noted in **ES Appendix 9-3: Flood Risk Assessment** (Revision 01) **[EN010152/APP/6.3]**, the depth and construction around the Thorpe Marsh Water Storage Area (WSA) and flood defence embankments will be identified through liaison with the Environment Agency and horizontal directional drilling wil be used at a sufficient depth to avoid compromising the structural integrity of the flood defence embankments and WSA. The proposed methodology will be detailed within the final CEMP with measures included to prevent any damage or disturbance to any assets. The Applicant has agreed with the Environment Agency the wording for the protective provisions included in Schedule 14 part 5 of the Draft DCO. 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. It is considered these protective provisions will ensure the Applicant and Environment Agency work in tandem thoroughly on the final design and construction of any works

ExQ1	Respondent	Question	Applicant's Response
			within the vicinity of the Thorpe Marsh WSA and other flood defences, such that any impacts which could affect the integrity of these defences is avoided.
1.7.10	Applicant/Environment Agency	The ExA notes that the methodology of the hydraulic modelling undertaken as part of the FRA [APP-158 & APP-159] was agreed with the Environment Agency. We further note that the hydraulic modelling report (Annex A of the FRA) and model data was sent to the Environment Agency for review and approval but their comments and approval were still pending at the time of submission. Please provide an update.	Further discussions have been held with the Environment Agency and on 8th May 2025 they confirmed their agreement to the modelling approach. An updated **ES Appendix 9-3: Flood Risk Assessment** (Revision 01) **[EN010152/APP/6.3]** has been submitted at Deadline 2.
1.7.11	Applicant	Please provide details of sources of water supply and permitting requirements for all proposed activities using water or signpost where they can be found in the ES. This includes vehicle washing & other cleaning water/ concrete wash water etc.	<u>Water Supply:</u> As outlined in Paragraph 2.7.58 of **ES Chapter 2: The Scheme [APP-054]**, the Applicant anticipates that water for the Operation and Maintenance Hub and temporary facilities will be sourced from an existing supply at a nearby farm, with a separate meter installed for the Scheme. However, to present a conservative (worst-case) assessment for the construction phase, it is assumed that this supply may not be available at that stage. In this case, all water required during construction—including for vehicle washing, concrete washout, and general cleaning—would be imported by road from nearby licenced abstraction sources and stored on site in Intermediate Bulk Containers (IBCs) or similar containers.

ExQ1	Respondent	Question	Applicant's Response
			The use and management of water supplies for construction activities will be addressed through the Water Management Plan (WMP), which forms part of the **Framework Construction Environmental Management Plan (CEMP) [REP1-019]**. <u>Permitting Requirements:</u> All water used on site will either be sourced from existing supplies or imported from already licenced water abstraction points. As such, no new abstraction licences are required. The use of water will remain within the parameters of existing permissions, and all relevant regulations and permitting requirements will be adhered to as part of the implementation of the WMP.
1.7.12	Applicant/Environment Agency	The EA published new flood and coastal erosion risk data on 25 March 2025. Are there any implications for the relevant assessments for the proposed development, as a result of these updated data sets?	The **ES Appendix 9-3: Flood Risk Assessment** (Revision 01) **[EN010152/APP/6.3]** has been updated, and submitted at Deadline 2, to refer to the latest datasets. There are no implications as a result of these updates. The modelling undertaken as part of the FRA has informed the Scheme's design and mitigation.
8.	**Soils and agriculture**		
1.8.1	Applicant	ES Chapter 12: Socio-Economics and Land Use (paragraph 12.7.52) [APP-064]. The ExA notes that some 0.78ha of Best and Most Versatile (BMV) land would be permanently lost to structural planting.	As outlined in **ES Chapter 12: Socio-Economics and Land Use [REP1-013]** the total BMV land use associated with the Scheme is 30.2ha. Of this total,

ExQ1	Respondent	Question	Applicant's Response
		Please signpost where within the documents it states what other uses would be taking place on BMV land based on the extent shown in Map 2 in the Agricultural Land Classification (ALC) report [APP-175].	0.78ha would consist of structural planting i.e. hedgerows. It is possible that, once the land is handed back to the landowner following decommissioning, the hedgerows could be removed for farming practices. However, a worst case scenario has been assumed within ES Chapter 12 that the hedgerows will be retained following decommissioning. It is also highlighted that, as the hedgerows typically follow field boundaries, they will perform a boundary function and are unlikely to impact on the area to be farmed following decommissioning. Other uses that would be taking place on the remaining BMV land is outlined below:

Site Element	Total (Ha)
BESS	0.5
BESS Fire Service Access Tracks (8m)	0.53
Conservation and Enhancement of the Existing Open Riparian Mosaic, Including the Creation of Some Wet Grassland	2.05
Field Station	0.04
Grid Connection Line Drop Compound	0.18
Gapping up of Existing Hedgerow	0.40
Proposed Modified Grassland	20.89
Proposed Neutral Grassland (Good Condition)	0.73

ExQ1	Respondent	Question	Applicant's Response	
			Proposed Neutral Grassland (Moderate Condition)	3.85
			PV Field Access Tracks (4m)	0.17
1.8.2	Applicant	The ExA notes that fields SW11 and SW12 consist of BMV land (Grades 2 and 3a). A number of application documents (including paragraph 6.9.8 of the planning statement [APP-190]) state that BMV land identified on the ALC mapping was avoided where possible. Furthermore, the ExA notes that a number of significant effects associated with the use of these fields are identified in ES Chapter 10: Landscape and Visual Amenity [APP-062] in relation to nearby residential receptors, including Jet Hall Farm. Please explain: 1. the applicant's rationale for including these fields in the Proposed Development, including how it represents good design; 2. how the use of these fields, consisting of BMV, represents an efficient use of land; and 3. the implications for the generating capacity for the proposal should these two fields be removed from the order limits.	The Applicant has carefully considered the potential removal of fields SW11 and SW12 from the Proposed Development, but does not intend to exclude them. The rationale for their inclusion is based on a combination of national policy and need, design optimisation, and the ability to mitigate and reverse impacts. In summary: A. National need and policy context: There is an urgent national need for low-carbon, renewable energy infrastructure, and the Proposed Development qualifies as a Critical National Priority (CNP) project under NPS EN-1. Paragraph 4.1.7 of NPS EN-1 states that the national need for such infrastructure will generally outweigh residual adverse impacts, "except in the most exceptional circumstances." None of the exceptional circumstances listed in Paragraph 4.1.7 apply to this Scheme. B. Site selection and alternatives: 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	

ExQ1	Respondent	Question	Applicant's Response
			Natural England. The results of this exercise are set out in **Volume I, Chapter 3: Alternatives and Design Evolution [APP-055]**. While the Solar PV Site was chosen to avoid large quantities of BMV ALC land being affected, not all BMV land (like fields SW11 and SW12) could be avoided. However, the overall approach was to minimise the impact at the Order Limits selection stage and, if that approach hadn't been undertaken, the impacts on BMV land could have been much greater. C. Consideration of current land use Fields SW11 and SW12 are not currently farmed for high-quality agricultural food production and were recently used for the biomass crop, Miscanthus. The Applicant estimates that the use of these fields for solar produces 30 - 60 times more electrical production than Miscanthus. D. Efficient and reversible use of land: Whilst the fields do contain BMV land, the activities proposed to be located on these by the Scheme is temporary and reversible. No permanent infrastructure is proposed within these fields, and the construction and operation of the Scheme will be undertaken in accordance with the **Framework Soil Management Plan** (Revision 01) **[EN010152/APP/7.10]**, ensuring that the land's agricultural quality is preserved. Further, soil quality may improve over time on solar farm sites as the

ExQ1	Respondent	Question	Applicant's Response
			land is taken out of intensive agricultural use, allowing the soil to rest and naturally recover. This reduction in disturbance, coupled with the establishment of grassland or wildflower habitats, can enhance soil structure, increase organic matter, and support a healthier soil ecosystem. Post-decommissioning, the land will be restored to its previous agricultural use, as secured through Schedule 2, Requirement 18 of the **draft DCO [REP1-005]**. Accordingly, **ES Chapter 12: Socio-Economics and Land Use [REP1-013]** concludes that the effect on BMV land will be negligible. E. Design quality and visual impact: Good design involves balancing multiple considerations, including climate objectives, efficient land use, landscape and visual effects, agricultural quality, and local engagement. Given the proximity of the field to residential receptors, only Works Area 1 (Solar PV Panels) is proposed to be included here, rather than larger or permanent infrastructure such as the BESS Area or On-Site Substation. While the use of fields SW11 and SW12 results in a moderate adverse (significant) visual effect at Jet Hall Farm at Year 15 (Winter), this assessment reflects a precautionary approach. The affected views are oblique and primarily limited to upper-storey windows on a single façade. Photographs provided by the occupier confirmed the assessment as

ExQ1	Respondent	Question	Applicant's Response
			precautionary; nonetheless, the significance of effect was maintained in recognition of the high sensitivity attributed to residential receptors. It should also be noted that the owner-occupier of Jett Hall supports the inclusion of fields SW11 and SW12 within the Scheme. F. Impact on generating capacity: Fields SW11 and SW12 contain approximately 8MWp of panels, (circa 12,307 650Wp panels). Whilst this equates to circa 2.2% of the Scheme, it is also equivalent to 2,000 domestic properties with rooftop solar (4kWp systems). Exclusion of fields SW11 and SW12 would therefore result in a reduction in the overall generating capacity of the Scheme and would in turn reduce the Scheme's contribution to national decarbonisation and energy security targets, undermining the urgency of the policy imperative for renewable generation. In conclusion, the inclusion of fields SW11 and SW12 reflects a balanced and considered design approach that supports national policy, accommodates reversible impacts, and maintains the integrity and capacity of the Scheme.
1.8.3	Applicant	As there would be a loss of agricultural land, including BMV, over the intended lifespan of the proposed development, and that PDL land would not be utilised for the energy generation, please explain	Please see the Applicant's response to questions 1.8.1 and 1.8.2.

ExQ1	Respondent	Question	Applicant's Response
		whether you consider the proposal would constitute an efficient use of land?	
1.8.6	Applicant	**fSMP paragraph 2.1.2 [APP-199].** The fSMP says the detailed SMP would provide information on expected after use for each soil "for example whether topsoil to be used on site, used or sold off site". a) if top and subsoil is only to be stripped from the cable route corridor to allow the placement of the cables, please provide clarification as to why topsoil would be sold off site and not placed back to its original location. b) please give an example of why and how subsoils stripped would be used as structural fill or topsoil manufacture and not placed back to their original position. c) please explain the intent and reason for the sentence "for example whether topsoil to be used on site, used or sold off site" when paragraph 2.1.3 says that "it is expected all soils will be retained on site and reinstated in their area of origin".	The **Framework Soil Management Plan** (Revision 01) **[EN010152/APP/7.10]** incorporates a degree of flexibility to allow for site-specific considerations that may arise during construction. While Paragraph 2.1.2 references the potential for topsoil to be used off site, this reflects a standard example of possible outcomes in generic Soil Management Plan (SMP) templates. In practice, there is no current intention for soil to be removed from the Solar PV Site. Should that position change, a Materials Management Plan would be prepared alongside the detailed SMP, in accordance with regulatory guidance, to ensure appropriate reuse and compliance. Further, the Framework SMP has been updated to remove any reference to the potential sale of soil, and the Applicant confirms that soil will not be sold as part of the Scheme. Within the cable route corridor, both topsoil and subsoil will be stripped only where necessary to facilitate cable installation. These soil layers will be stored separately and temporarily within the working corridor, local to the point of excavation, to avoid mixing and to preserve soil structure. Following the completion of works, reinstatement will occur with topsoil and subsoil returned in their original

ExQ1	Respondent	Question	Applicant's Response
			sequence and location to enable the continuation of existing agricultural use. To clarify, the intent of the wording in Paragraph 2.1.2 was to allow for flexibility at the framework stage. However, as confirmed in Paragraph 2.1.3, it is anticipated that all soils will be retained on site and reinstated in their area of origin. This expectation remains unchanged, and further clarity will be provided as the detailed SMP is developed.
1.8.7	Applicant	**ES Chapter 12: Socio-Economics and Land Use [APP-064] and the fSMP [APP-199].** Please: a) signpost where within these documents it clearly sets out where soils would be stripped and why. b) confirm whether the mapping referred to in paragraph 2.1.2 of the fSMP would indicate the areas where topsoil and subsoil were stripped from, and where they should be returned to, so that the correct soils can be returned to their original location. If so, please update paragraph 2.1.2 of the fSMP to make this explicit. If not, please explain. c) confirm where construction compound soils would be stockpiled within the order limits for the duration of the construction compounds.	The Applicant has responded to each of the three questions in turn below. a) The areas where soil stripping is anticipated are set out in general terms in the **Framework Soil Management Plan** (Revision 01) **[EN010152/APP/7.10]]** and relate to locations where excavation or ground disturbance is required. These include construction access routes, construction compounds, substations, and the Battery Energy Storage System (BESS). The purpose of soil stripping in these areas is to preserve the topsoil for subsequent reinstatement. The specific areas and rationale for soil stripping will be confirmed during the development of the detailed SMP, in consultation with the appointed contractor. Although **ES Chapter 12 [REP1-013]** does not provide a breakdown of soil stripping locations, it

ExQ1	Respondent	Question	Applicant's Response
			addresses land use considerations relevant to soil management. b) Paragraph 2.1.2 of the fSMP refers to the mapping that will be produced as part of the detailed SMP. This mapping will identify the areas from which topsoil and subsoil have been stripped and the corresponding locations to which they should be returned, ensuring that soils are reinstated in their area of origin. The Applicant acknowledges the need to make this intent more explicit and has updated Paragraph 2.1.2 of the **fSMP [EN010152/APP/7.10]**, which has been submitted at Deadline 2. c) Soils stripped from construction compound areas will be stockpiled within the Order Limits for the duration of construction. The specific locations for stockpiling will be identified in the detailed SMP, based on discussions with the contractor and in accordance with good practice soil management and environmental protection measures.
1.8.8	Applicant	**fSMP [APP-199].** As stockpiled soils could remain in place for some time, please provide details as to how those soils would be safeguarded whilst they are stockpiled, from erosion or damage.	As outlined in Paragraph 4.7.2 of the **fSMP** (Revision 01) **[EN010152/APP/7.10]** where soil is expected to be stored for a period of more than six months, the stockpiles should be seeded with appropriate low maintenance grass/clover mixture (or similar) which is agreed with landowner and subject to the conditions/restrictions within the contract.

ExQ1	Respondent	Question	Applicant's Response
1.8.9	Applicant	ES Chapter 12: Socio-Economics and Land Use [APP-064] paragraph 12.7.49 sets out that the land will be planted up as grassland or native scrub. Please provide further details of how this would be managed, including through the DCO, and explain why such an approach is being taken.	The management of all habitats, including areas to be planted as grassland or native scrub, will be undertaken in accordance with the **Framework Landscape and Ecological Management Plan [REP1-029]]**. The LEMP sets out the objectives, prescriptions, and monitoring measures for the establishment and long-term management of these habitats. This document will be secured through Schedule 2, Requirement 6 of the draft DCO. The creation of grassland and native scrub aligns with the project's biodiversity objectives, contributing to habitat enhancement and ecological connectivity across the Solar PV Site.
1.8.10	Applicant	**ES Appendix 12-3: Agricultural Land Classification Report [APP-175].** Please explain the reasoning behind the locations chosen for the trial pits as shown on Map 1 Observations.	The soil survey methodology adopted for the project is consistent with the approach outlined in the Scoping Report submitted as part of the pre-application process and is in accordance with the Ministry of Agriculture, Fisheries and Food (MAFF) guidelines. The trial pit locations identified in **ES Appendix 12-3: Agricultural Land Classification Report [APP-175]** were selected to provide a representative assessment of soil types and structures across the Solar PV Site. The primary aim was to observe and record variations in soil profile and characteristics relevant to Agricultural Land Classification. Pits were hand-dug to dimensions of approximately 1 m x 1 m and to a depth of up to 1.2 m. Surveyors

ExQ1	Respondent	Question	Applicant's Response
			were given a degree of discretion in selecting precise locations within each survey area to minimise disruption to growing crops and avoid localised constraints. This flexibility allowed for the collection of robust and representative data while limiting any adverse impact on agricultural activity. All pits were reinstated following the survey.
1.8.11	Applicant	**ES Appendix 12-3: Agricultural Land Classification Report [APP-175].** Field SW10 is to have both the construction compound and the BESS. It is noted that where these elements are proposed, the ALC has some BMV Grade 2 and 3a land within it. Please confirm: a) what safeguards will be in place for the construction compound to protection those soils from degradation during the construction and decommissioning phases? b) what measures would be put in place during the operational phase to protect the BMV agricultural land? c) please signpost where within the fSMP [APP-199] these safeguards are in place. d) what safeguards would be in place to protect the soils beneath the BESS and please confirm the volume of Grade 3a land that would be affected by the BESS. Please provide a plan that overlays the BMV Grades 1 - 3a with the Indicative Site Layout Figure 2-3 to demonstrate the positioning of permanent infrastructure and BMV agricultural land.	The Applicant has responded to each point in turn below. a) For areas used as construction compounds, including Field SW10, topsoil will be stripped and appropriately stored within the Order Limits for the duration of the construction phase. This approach is intended to preserve soil quality and structure, allowing for successful reinstatement post-construction. These measures will be confirmed and detailed within the detailed Soil Management Plan (SMP). b) During the operational phase, the condition of soils beneath and surrounding infrastructure (including the PV arrays) will be monitored through the performance of the established vegetation, which acts as a proxy for soil health. The absence of regular cultivation is expected to support positive soil structure development over time. If vegetation or habitat performance does not meet expectations, further investigations into underlying soil conditions

ExQ1	Respondent	Question	Applicant's Response
			will be undertaken, and appropriate management measures implemented to safeguard BMV land (see response below). c) Measures relating to operational aftercare of soils and safeguards during construction and decommissioning are set out in the **Framework Soil Management Plan (fSMP)** (Revision 01) **[EN010152/APP/7.10]**, in particular Section 4.11. Soil stripping, storage, and reinstatement principles, including those applicable to infrastructure areas such as the BESS, are also outlined in Paragraph 2.1.2 of the fSMP, which notes that schedules of soil volumes and reinstatement locations will be developed in the detailed SMP. d) It is anticipated that topsoil will be stripped from the area occupied by the BESS and stored for reinstatement following decommissioning, in line with the requirements outlined in Section 4.7 of the fSMP. The fSMP (Paragraph 2.1.2(d)) recognises that this will be supported by detailed scheduling of soil volumes and locations at the next stage. The distribution of ALC grades, including Grade 2 and Subgrade 3a (classified as BMV), is shown in Map 2 of **Volume III, Appendix 12-3: Agricultural Land Classification Report [APP-175]**. A new figure has been prepared, **Figure 8.28 Agricultural Land Classification for the indicative layout of the Solar PV site [APP-8.28]**, and submitted at

ExQ1	Respondent	Question	Applicant's Response
			Deadline, which overlays ALC grades on the indicative site layout. All infrastructure, including the BESS, is considered long-term but temporary. Upon decommissioning, topsoil will be reinstated, and the land restored with the objective of achieving its original ALC grade.
1.8.12	Applicant	fSMP paragraph 4.1.2 [APP-199]. Please provide clarification on the following: a) what is meant by 'outside designated areas' for point 4.1.2(a). b) where donor areas and receptor areas are likely to be within the order limits and why this would occur. c) should there be a general principle that plant/ machinery should be stored during the daytime/ overnight in the construction compounds to ensure they are not left somewhere else and cause compaction and leakage of oils etc. d) paragraph 4.1.2 (j) says daily records are maintained. Would these daily records be provided to CDC or management? e) should there be provision for protective matting being in place for the construction compounds over the soils to protect soil integrity during construction period?	The Applicant has responded to each point in turn. a) In Pararapgh 4.1.2(a) of the **fSMP** (Revision 01) **[EN010152/APP/7.10]**, the term "outside designated areas" refers to areas that are not specifically identified for access, vehicle movement, or construction activities. Designated areas include defined access routes, construction compounds, substation and BESS locations, and other parts of the Proposed Development where soil stripping and protective measures will be in place. Restricting vehicle movement to these areas helps minimise soil compaction and damage elsewhere. b) Within the Order Limits, "donor areas" refer to those locations from which soils—typically topsoil and, where required, subsoil—are stripped for temporary removal during construction (e.g. compounds, access routes, substation and BESS areas). "Receptor areas" are the locations where this material would be temporarily stored for later reinstatement. The specific locations of these receptor areas would be defined in consultation with

ExQ1	Respondent	Question	Applicant's Response
			the contractor and would aim to minimise haulage distances and avoid sensitive land or habitats. c) As a general principle, plant and machinery would be stored within designated construction compounds during both the daytime and overnight periods. This practice reduces the potential for inadvertent compaction, oil or fuel leaks, and other impacts on soils. The fSMP has been updated to include this requirement. d) Daily records referred to in Paragraph 4.1.2(j) are intended to demonstrate adherence to good practice and the commitments set out in the fSMP. These records would be made available to those with responsibilities outlined in Section 1.2 of the fSMP ('Roles and Responsibilities'), and shared with the relevant planning authority or other competent authority upon request. e) It is anticipated that, all construction compound areas will be subject to topsoil stripping, with the stripped material stored appropriately for reinstatement. In circumstances where topsoil remains in situ—particularly in areas subject to trafficking—protective measures such as matting or cellular confinement systems would be applied to safeguard soil structure and function during the construction phase. The fSMP has been updated to

ExQ1	Respondent	Question	Applicant's Response
			include this requirement and submitted at Deadline 2.
1.8.13	Applicant	fSMP paragraph 4.2.2 [APP-199] states that where the soil profile has already been disturbed, the works should be completed to the base level in that location. What does the base level in this context mean?	Base level in this context means to the depth of the topsoil layer or subsoil layer.
1.8.14	Applicant	fSMP paragraph 4.7.1 [APP-199]. Please confirm what are the temporary and permanent buildings in addition to those within the construction compounds, the BESS and the operations and maintenance hub.	Temporary and permanent buildings are the construction compounds, BESS Area and operations and maintenance hub.
1.8.15	Applicant	Please signpost where in the documentation information on the monitoring and management regime for BMV land can be found. In particular, please identify any structures both during the construction phase (i.e. the construction compounds) and then the operational phase (i.e. the BESS and solar panels) which the applicant considers should be monitored to ensure the BMV standard remains. Please also provide details and the frequency of that monitoring, what that monitoring would entail and what remediation measures would be carried out either before the operational phase commences or during the operational phase i.e. not just the restoration phase which is taken to mean at the end of the decommissioning phase.	Information on the monitoring and management regime for Best and Most Versatile (BMV) land is outlined in the **Framework Soil Management Plan** (Revision 01) **(fSMP) [EN010152/APP/7.10]**, particularly in relation to operational soil care and reinstatement. The condition of seeded grassland established across the Solar PV Site—on both BMV and non-BMV land—will be monitored as a proxy indicator for underlying soil health. This includes vegetation and sward development monitoring, which is also required to deliver the biodiversity objectives associated with the scheme. The results of this monitoring will inform ongoing site management throughout the operational and maintenance phase.

ExQ1	Respondent	Question	Applicant's Response
			Should vegetation monitoring indicate suboptimal performance (e.g. poor grass growth or reduced habitat functionality), soil condition would be investigated as a possible contributing factor. In such cases, soil parameters including compaction, drainage and nutrient levels would be assessed, and appropriate remediation measures (e.g. soil aeration, drainage improvements or targeted nutrient amendments) would be implemented as required. During the construction phase, soil protection measures would apply to areas of BMV land affected by construction compounds or infrastructure such as the Battery Energy Storage System (BESS). These include stripping and storage of topsoil, protection against compaction, and appropriate handling and reinstatement practices—all of which are described in the fSMP. The monitoring frequency and further detail will be confirmed in the detailed Soil Management Plan, to be prepared in consultation with the contractor. However, the approach will follow a "monitor and respond" principle, with adaptive management triggered by any evidence of deterioration in vegetation or soil performance. The Applicant remains committed to restoring the Solar PV Site to its current Agricultural Land

ExQ1	Respondent	Question	Applicant's Response
			Classification (ALC) grades upon decommissioning, but proactive monitoring and management during the operation and maintenance phase will also support the retention of BMV land quality throughout the lifetime of the development.
9.	**The historic environment**		
1.9.1	Applicant	The Framework Archaeological Mitigation Strategy (FAMS) [REP1-044] and ES Chapter 7: Cultural Heritage [REP1-011]. There appears to be an inconsistency between these two documents as to which fields were not able to be trenched during the first phase of work due to ecological constraints. The FAMS says it is fields NE3, NE8 and NE10 whereas paragraph 7.4.14 of Chapter 7: Cultural Heritage says it is fields NW3, NW8 and NW10. Please confirm which fields were not surveyed and confirm when these fields would be surveyed and how this would be secured.	The text within the **Framework Archaeological Mitigation Strategy [REP1-044]** is correct, Fields NE3, NE8 and NE10 were not surveyed during the first phase of trenching due to ecological constraints. The requirement for trial trenching within these three fields is set out within the **Framework Archaeological Mitigation Strategy [REP1-044]** and will be undertaken post-consent, which has been agreed with South Yorkshire Archaeology Service (SYAS), and as set out within Paragraph 1.1.4 of the Framework AMS. The requirement for trial trenching within these three fields will be set out in the Final Archaeological Mitigation Strategy secured through Requirement 10 of the **Draft DCO [REP1-005]**.
1.9.2	Applicant	Planning Statement [APP-246] paragraph 4.2.22 states the compounds would be approximately 150m x 150m. However, the construction compound shown in Field NW7 on the Works Plan – Rev 1 [APP-214] and ES Figure 2-3 [APP-074] show a much larger area. Please confirm the size of the indicative construction compound in Field NW7 and	The Applicant can confirm that the area of the compound is approximately 357 m x 162 m and was initially indicated as an area for the siting of the compound servicing the Northern half of the Order limits.

ExQ1	Respondent	Question	Applicant's Response
		explain given the construction compounds proximity to heritage assets, why the compound is required to be of that size.	The potential effects of the Scheme, including temporary components, have been assessed in **ES Volume I Chapter 7: Cultural Heritage [REP1-011]** based on a worst-case scenario as per the Rochdale Envelope parameters. With regards to the setting of designated heritage assets in proximity to this temporary compound in Field NW7, no significant effect has been identified. With regard to below ground archaeological remains, the indicative location of the temporary compound located in Field NW7 is in the vicinity of non-designated archaeological remains identified through geophysical survey and trial trench evaluation undertaken for the Scheme. In a worst-case scenario, where the Scheme would include below ground works in this area that would impact the remains, a significant effect on these remains has been identified in **ES Volume I Chapter 7: Cultural Heritage [REP1-011]**. Mitigation has been proposed, which is secured within the **Framework Archaeological Mitigation Strategy (FAMS) [EN010152/APP/8.16]**, and through Requirement 10 of the **DCO [REP1-005]**, which would mitigate the significant effect, resulting in a non-significant residual effect. It is not expected that the compound will require all the area identified on the **Works Plan [APP-214]** and allows harm to heritage assets to be further

ExQ1	Respondent	Question	Applicant's Response
			minimised through detailed design and micro-siting of the compound**.** Therefore, the Applicant wishes to retain the flexibility of the area shown on the **Works Plan [APP-214]** pending the development of the Construction and Decommissioning Environmental Management Plans, secured by requirements 11 and 18 respectively of the **Draft DCO [REP1-005].** It is through these management plans that design, mitigation and control measures associated with the compounds will be agreed and which must be substantially in accordance with the **Framework Construction Environmental Management Plan** (Revision 02) **[EN010152/APP/7.7]**and **Framework Decommissioning Environmental Management Plan [REP1-021]**.
1.9.3	Applicant	The FAMS [REP1-044] paragraph 4.1.1. It appears the reference to Table 1 in paragraph 4.1.1 is incorrect as Table 1 is listed as Relevant Regional Research Agenda Strategic Objectives. Please confirm if Table 1 is the correct reference.	The **Framework Archaeological Mitigation Strategy** (Revision 01) **[EN010152/APP/8.16]** has been updated to confirm reference to Table 2 and submitted at Deadline 2.
1.9.4	Applicant	The FAMS [REP1-044] Table 2: Schedule of Preliminary Archaeological Mitigation Sites identifies Fields NW8 and NW10 as preservation in-situ (avoidance). Please explain how this proposed mitigation measure would be achieved when these fields are identified as having solar panels on them.	Embedded mitigation in the form of preservation in-situ (avoidance) has been identified for an area of archaeological activity which extends along the Fleet Drain in the southern portions of Fields NE8 and NE10. This embedded mitigation area is presented on **ES Volume II Figure 2-3: Indicative Site Layout Plan [APP-074]** as 'Heritage Buffer Area' and is shown as Area 17 on Figure 4 of the Framework Archaeological Mitigation Strategy.

ExQ1	Respondent	Question	Applicant's Response
			The FAMS Table 2 has been updated to correct this error and submitted at Deadline 2.
1.9.5	Applicant	Environmental Commitments and Mitigation Register [APP-189] #CH-01, #CH08, #CH-10 and #CH-11. Please explain why the FAMS [REP1-044] is not listed as a Commitment Securing Mechanism for these IDs.	The Applicant confirms that the **Framework Archaeological Mitigation Strategy (FAMS)** (Revision 01) **[EN010152/APP/8.16]** should indeed be listed as a Commitment Securing Mechanism for commitments #CH-01, #CH-08, #CH-10 and #CH-11 within the **Environmental Commitments and Mitigation Register [APP-189]**.
1.9.6	Applicant	Environmental Commitments and Mitigation Register [APP-189]. Please signpost the documentation which: a) details which hedgerows and boundaries in particular would be replanted/ enhanced (ID #CH-05) b) details which hedgerows in proximity to designated heritage assets would be enhanced to screen and reduce potential impacts (ID #CH-07).	The Applicant can confirm the **Framework Landscape and Ecological Management Plan (FLEMP) [REP1-029]** provides details of which hedgerows and boundaries would be replanted or enhanced as part of the Scheme's overall landscape strategy. This includes measures to restore existing hedgerows, plant new hedgerows, and strengthen gaps within the hedgerow network. The **Hedgerow Report, Volume III, Appendix 8-5 [APP-150]** identifies hedgerows of heritage importance, including those in proximity to designated heritage assets.
1.9.7	Applicant	Please explain the approach taken to identify the chosen locations for the temporary compounds with specific regard to minimisation of harm to heritage assets.	The potential effects of the Scheme have been assessed based on a worst-case scenario as per the Rochdale Envelope parameters, including long-term (for the lifespan of the Scheme) and temporary components of the Scheme.

ExQ1	Respondent	Question	Applicant's Response
			With regards to potential effects through change to the setting of heritage assets in proximity to the temporary compounds, no significant effect has been identified. With regard to below ground archaeological remains, the indicative location of the temporary compound located in Field NW7 is in the vicinity of non-designated archaeological remains identified through geophysical survey and trial trench evaluation undertaken for the Scheme. In a worst-case scenario that the Scheme would comprise below ground works in this area that would impact the remains, a significant effect on these remains has been identified in **ES Volume I Chapter 7: Cultural Heritage [REP1-011]**. Mitigation has been proposed, which is secured within the **Framework Archaeological Mitigation Strategy (FAMS) [REP1-044]**, and through Requirement 10 of the **DCO [REP1-005]**, which would mitigate the significant effect, resulting in a non-significant residual effect. The maximum geographic parameters of the temporary compounds are identified by Work Nos. 4, 5 and 6 on the **Works Plan [APP-214].** It is not expected that the compounds will require all the areas identified and this allows harm to heritage assets to be further minimised through detailed design and micro-siting of the compound within the

ExQ1	Respondent	Question	Applicant's Response
			areas identified on the **Works Plan [APP-214].** Therefore, the Applicant requires flexibility in the areas required pending the development of the Construction and Decommissioning Environmental Management Plans, secured by requirements 11 and 18 respectively of the **Draft DCO [REP1-005].** It is through these management plans that design, mitigation and control measures associated with the compounds will be agreed and which must be substantially in accordance with the **Framework Construction Environmental Management Plan [REP1-019]** and **Framework Decommissioning Environmental Management Plan [REP1-021]**.
1.9.8	Applicant	ES Chapter 7: Cultural Heritage [REP1-011]. If the Grid Connection Line Drop is utilised, this would comprise below ground cables from the substation to the drop point. Please confirm whether the below ground cables would impact upon any archaeological finds. Please signpost where mitigation measures are provided for any potential harm to archaeological finds along this proposed route. Please confirm how the below ground cable would be installed to safeguard archaeological heritage assets.	If the Grid Connection Line Drop is utilised, this would be located on-site within the existing DCO Order Limits of the Solar PV Site. The entire Solar PV Site has already been subject to geophysical survey and trial trench evaluation (except for three fields which will be trenched post-consent). The mitigation areas identified within the Framework AMS have been agreed for all areas that have been evaluated. The **Framework Archaeological Mitigation Strategy (FAMS) [REP1-044]** sets out the strategy for completion of the remaining three fields to be trenched, and then also sets out a protocol for agreeing mitigation strategies for any further areas of archaeological activity identified.

ExQ1	Respondent	Question	Applicant's Response
			Following detailed design, including confirmation of the Grid Connection option, the Framework AMS will be reviewed to take into account any new impacts that may arise as a result of the scheme design, and final mitigation strategies will be agreed with the Archaeological Advisor to City of Doncaster Council. This is set out within Section 10 of the Framework AMS and will be set out within the Final AMS secured via Requirement 10 of the **DCO [REP1-005]**.
10.	**Transport and access, highways and public rights of way**		
1.10.1	Applicant	Framework Operational Environmental Management Plan (fOEMP) [APP-197] section 2.5. A limited number of Heavy Goods Vehicles (HGVs) are expected during the operational phase associated with the replacement of batteries, inverters and transformers. Please confirm the access for HGVs into the solar PV site for those accessing the Field Stations for maintenance reasons as this does not appear to be covered in paragraph 2.5.5.	Similar to the construction phase, access for Heavy Goods Vehicles, will be solely from Access 1 off Moss Road, which is noted as access 6/14 on Sheet 6 of the Streets, Rights of Way and Access Plans **[REP1-004]**. The details of Access 1 are presented in the Appendix A of the Framework Construction Traffic Management Plan **[APP-206]**. This clarification has been added into Section 2.5 of the **Framework Operational Environmental Management Plan** (Revision 01) **[EN010152/APP/7.8],** which has been submitted at Deadline 2.
1.10.2	Applicant	The Framework Construction Traffic Management Plan (fCTMP) [APP-251 & APP-252] at paragraph 4.1.3 states that access arrangements to the grid connection corridor would be 100% via Trumfleet	The Applicant has prepared the following responses to cover the respective sub-points that the Examining Authority has raised:

ExQ1	Respondent	Question	Applicant's Response
		Lane (Access Point 3), Marsh Road (Access Points 7 and 8) and Thorpe Bank (Access Points 9 and 10). However, Section 7.3, Table 9: HGV Routing and Section 10.6 of ES Appendix 13-4: Transport Assessment [APP179] and Section 4.3 of the fCTMP [APP-251 & APP-252] say that HGV movements would be restricted to certain routes: Moss Road to the strategic road network and the A19. This would imply that no HGVs would be travelling along Trumfleet Lane, Marsh Road, Brick Kiln Lane or Thorpe Bank. The response to [RR-026] within the applicant's Response to Relevant Representations [REP1-031] states for construction HGV movements for the grid connection corridor, a haul road would be constructed between Access 2 on Moss Road and Access 3 on Trumfleet Lane and that ES Appendix 13-4: Transport Assessment [APP-179] assumes up to 6 two-way HGV movements would utilise this haul road between Access 2 and 3. Please: a) explain what the expected proportion of HGVs accessing the order limits daily (i.e. of the 18 individual HGVs) would be accessing the grid connection corridor. b) explain what the expected proportion of HGVs accessing the grid connection corridor would be accessing/ egressing each individual access point	a). It should be noted that the only vehicles accessing the Grid Connection Corridor would be Tractor-Trailers or cars/vans. The expected proportion of Tractor-Trailer vehicles accessing the grid connection corridor would be 3 in and 3 out per day (6 two-way movements). This total is included within the 18 in and 18 out (36 two-way) overall movements accessing the order limits daily. b). The volume of Tractor-Trailer vehicles accessing the grid connection corridor is expected to vary over the course of construction, as construction activities move along the cable route. The number accessing any one particular access point daily would not be more than the 3 in and 3 out (6 two-way) stated. c). Construction workers for the grid connection corridor will access using their own vehicles. A daily total of 8 in and 8 out (16 two-way) construction worker vehicles are expected to access the grid connection corridor across Access Points 3, 5, 7, 8, 9 and 10. As with the Tractor-Trailer movements, construction activities will move along the grid connection corridor, and the above figures are a maximum using a single access, and the corridor as a whole, on any given day. d). The worst case number of daily Tractor-Trailer vehicles accessing one particular access point on the grid connection corridor would be 3 in and 3 out

ExQ1	Respondent	Question	Applicant's Response
		along the corridor (Access Point 2 – 11). Explain how HGVs would access the different parts of the grid connection corridor (Access Points 3, 5, 7, 8, 9 and 10) including the former Thorpe Marsh Substation. c) explain whether construction workers would be accessing the grid connection corridor via Access Points 3, 5, 7, 8, 9 and 10 directly by their own vehicle or minibus or would travel from the main construction compound within the solar PV site by tractor and trailer. d) set out what the worst-case scenario would be for HGVs accessing/ egressing an access point along the grid connection corridor and signpost where within the ES documentation the assessment of harm is for this and what mitigation measures would be provided. e) signpost where within ES Appendix 13-4 there are details of the haul road between Access 2 and 3 and the 6 daily two way HGV movements. f) please confirm if any further traffic management measures would be required for Access Point 9 given the highway narrows immediately north of this access point.	(6 two-way). Appropriate mitigation to lessen the impacts of these movements is provided within specific sections of the **Framework Construction Traffic Management Plan [APP-251 and APP-252]**. For reference, the measures include swept path analysis (Section 4.4) - which has deemed the design of the accesses and the suitability of the routes appropriate, temporary traffic management (Section 5.2.4), and introduction of measures and controls (Section 5.3). e). Designs for the haul road within the order limits for the haul road between Access 2 and 3 have not yet been confirmed, however the indicative route for the haul route has been depicted in the Deadline 2 figure submission titled "Grid Connection Corridor Construction Vehicle Access Route" **[EN010152/APP/8.25]**. The 6 two-way movements are not specifically referenced in the Transport Assessment (ES Appendix 13-4), however additional traffic flow diagrams **[EN010152/APP/8.27]**, provided at Deadline 2, have been provided for reference, which show these traffic movements were considered as part of the assessment. f). As shown on the Access 9 drawing provided within the **Framework Construction Traffic Management Plan [APP-251 and APP-252]**, a number of measures would be introduced to manage the movement of vehicles at this location.

ExQ1	Respondent	Question	Applicant's Response
			Access and egress will be controlled (e.g. through a combination of traffic marshalls/traffic signal control). Swept path analysis has also be carried out, indicating that required vehicle manoeuvres are possible, along with visibility splays demonstrating that safe visibility can be achieved.
1.10.5	Applicant	The fCTMP [APP-251 & APP-252] states that the West Lane access would be for emergency use only. Please clarify what emergency use would comprise and how such use would be limited/ restricted.	Usage of the proposed emergency access on West Lane would be for emergency vehicles or as an alternative access if others are not usable during an emergency situation. This is established through the **Framework Construction Traffic Management Plan [APP-251 and APP-252]** which is a control document and will determine the way that transport and access is managed through the operation and maintenance phase This access will be utilised where directed by emergency services in order to ensure timely access to address any emergency situation to the north east of the authorised development site.
1.10.6	Applicant	Please explain why Table 2: Construction Traffic Assessment Data of ES Appendix 11-4: Construction and Operational and Maintenance Noise Modelling [APP-172] has a 2026 Baseline and uses annual average weekly traffic (AAWT) figures whereas Table 16: 2028 Baseline Traffic and Construction Traffic within ES Appendix 13-4: Transport Assessment [APP-179] uses a 2028 baseline and annual average daily traffic (AADT) figures.	The Institute of Environmental Management and Assessment (IEMA) Guidelines for Environmental Assessment of Traffic and Movement request assessment of traffic based on AADT. However, for noise assessment, Table 2 of **ES Volume III Appendix 11-4 [APP-172]** contains a typo and should refer to a future baseline of 2028, which is the peak construction traffic year. It is confirmed that the data contained within Table 2 is 2028 traffic data.

ExQ1	Respondent	Question	Applicant's Response
1.10.7	Applicant	**Construction and operational phase accesses:** Please confirm the following: a) what surfacing internal access tracks (both at the solar PV site and the grid connection corridor) would be constructed of. b) whether a banksman be present at Access Point 1 Moss Road for the full 0900 – 1700 duration. c) Access 12 and 13 off of Lawn Lane Layout and Swept Path Analysis, fCTMP Part 2 of 2 [APP-252] Which vehicles and to what frequency vehicles would be using these access points.	The Applicant has prepared the following responses to cover the respective sub-points that the Examining Authority has raised: a) The surface specification of the internal access tracks is proposed to be an unbound aggregate construction for both the solar park and grid connection corridor network. However, any transition from the internal access tracks to the Local Road Network would be subject to agreement with the City of Doncaster Council. Following engagement with City of Doncaster Council Highways Officers, it has been agreed that wheel washing facilities will be put in place to minimise the risk of any mud or detritus being introduced on the adopted road network, as denoted in Section 5.3.14 of the **Framework Construction Traffic Management Plan [APP-251 and APP-252]**. b) In the Traffic Regulation Measures Plans, the Applicant has defined the access/egress off Moss Road to have either a banksperson or traffic signal control. This flexibility in approach has been provided in order to provide the Contractor with the necessary flexibility to safely operate this access point, and for the Local Highway Authority to agree the specific measures as deemed suitable based on the detail of the construction activities at the time. It is not anticipated that this access will require

ExQ1	Respondent	Question	Applicant's Response

banksperson or traffic signal control for the full duration of the construction programme, and would be limited to certain manoeuvres of construction operations such as (but not limited to):

- Abnormal Indivisible Load (AIL) access and egress manoeuvres, where the vehicle will be escorted into and out of the authorised development.

- During the construction of the access bellmouth itself, notably when the carriageway construction will tie into the existing carriageway surfacing.

The junction visibility splays prepared for Access 1 off Moss Road have been agreed in conjunction with the City of Doncaster Highways Officer and are based upon 85th percentile speed surveys to ensure that vehicles egressing onto the Moss Road will be able to exit safely.

c) For access 12 and 13, the maximum vehicle size proposed for this access is the Tractor-Trailer vehicle depicted on the corresponding drawing in Annex A of the **Framework Construction Traffic Management Plan [APP-251 and APP-252]**. These access points are required in order to provide construction and operational vehicle connectivity between adjacent land parcels.

ExQ1	Respondent	Question	Applicant's Response
			Approximately 50% of the total 36 two-way HGV movements stated in Table 1 of the **Framework Construction Traffic Management Plan [APP-251 and APP-252]** would be required to cross Lawn Lane between Access 12 and 13 over the course of a working day. This equates to 18 two-way movements, which would be Tractor-Trailer movements. It is expected that 50% of all 250 workers (125 workers) would also need to cross Lawn Lane between Access 12 and 13 over the course of a working day, however these would be transported by minibus. Based on a 25 seater minibus, this would equate to an estimate of 5 minibus movements north and 5 movements south across Lawn Lane, e.g. 10 two-way minibus movements.
1.10.8	Applicant	**Table 16 of ES Appendix 13-4: Transport Assessment [APP-179] ATC 11 Fenwick Common Lane.** Please confirm what the six development movements on Fenwick Common Lane during the PM Development Peak would be. If these are minibuses, please confirm that of the 92 Development movements during the AM Development Peak, six of those would be minibus movements.	The Applicant can confirm that the six traffic movements on Fenwick Common Lane in the PM Development Peak (1900-2000 hours) are minibuses. It can also be confirmed that of the 92 AM Development Peak movements, six are attributed to minibus movements.
1.10.9	Applicant	**Figure 13-2 Traffic Survey Locations [APP-124].** Please explain:	a). The Base 2028 figures do not include construction worker traffic volumes.

ExQ1	Respondent	Question	Applicant's Response
		a) whether the Base Year 2028 figures are without construction worker traffic. b) why there is no HGV assignment for the hours HGVs are proposed to access the site. c) why for Worker Assignment PV 0600-0700 the figures given for each ATC link within Figure 13-2 differ to the numbers presented in Table 16 of ES Appendix 13-4: Transport Assessment [APP-179]. d) when the minibuses that travel to the site between 0600-0700 would leave via Access Point 1 or would they remain on site during the day. e) why, for the minibus assignment 0600-0700, eight minibuses travel at ATC 9 and ATC 10, however six travel to ATC 11. Please explain where the two other minibuses travel to. f) why there is no Base Year 2023 for 1900-2000 hours (this being the time when workers are proposed to leave the site), and why there are no base years for the hours when HGVs would be on the network associated with the development.	b). The HGV assignment volumes for the daily period were not included in the application documents. Further to this request these have been provided for reference within the additional traffic flow diagrams **[EN010152/APP/8.27]**, provided at Deadline 2. c). Figure 13-2 identifies the locations where surveys have been undertaken, by ATC reference numbers. Figure 13-2 does not include numbers of traffic flows in these locations. The numbers provided for the 06:00-07:00 and 19:00-20:00 development peaks within Table 16 also include minibus movements. The 24 hour AADT figures include a combination of the workers, minibus and HGV movements over the course of a day. In including the HGV movements, the 24 hour development AADT flows are higher than the AM and PM development flows combined. d). Minibuses would leave via Access 1 during the 06:00-07:00 AM Development Peak period. There is a typo on the corresponding flow diagram (page 20, **Volume III Appendix 13-2: Traffic Flow Diagrams [APP-177]** titled Minibus Assignment 06:00-07:00) that should indicate 8 minibus movements travelling west at ATC 9 and ATC 10. e). This is reflective of the split of staff related vehicle arrivals between Access 4 and Access 1. 75% of all staff movements will enter via Access 4 (Fenwick Common Lane/Haggs Lane) and 25% of all staff movements will enter via Access 1 (Moss

ExQ1	Respondent	Question	Applicant's Response
			Road access). This is explained within Section 5.5 of the **Transport Assessment [APP-179]**. f). Pages 5 and 6 of Appendix 13-2 have been given the same title in error. Page 6 should read 'Base Year 2023 - 19:00-20:00'.
1.10.10	Applicant	Please confirm what the worst-case scenario would be for access and egress of the abnormal indivisible loads (AIL) and how this has been taken into account in the assessments within the ES and its appendices	Details of arrangements for management of AILs is provided within Section 5.3 of the **Framework Construction Traffic Management Plan [APP-251 and APP-252]**, provided below for ease of reference: *a) AILs will be associated with the implementation of the On-Site Substation, with up to five AILs anticipated to be delivered during the construction phase.* *b) A specialised haulage service will be employed to allow these components to be transported with the necessary escort, permits and traffic management, with the contractor consulting the relevant highways authorities to ensure the correct permits are obtained. The police will also be given advanced notification under the Road Vehicle Authorisation of Special Types Order 2003.* *c) Management of street furniture will be required to facilitate access for the AILs at the A19/Moss Road junction in Askern.* *d) All AILs will be expected to follow the agreed HGV routing strategy when travelling to/from the Solar PV*

ExQ1	Respondent	Question	Applicant's Response
			Site. Further details related to the AILs will be included within the detailed CTMP for the Scheme.
1.10.13	Applicant	**ES Appendix 13-4: Transport Assessment [APP-179].** Please clarify the difference in time shown in Table 6: Trip Generation by Time Period and Table 7: Daily Profile of Generated Trips and paragraph 6.4.4 for when workers are due to leave the site. Please confirm whether all workers would be transported back to the Solar PV site as a hub to then leave the site i.e. from the grid connection corridor?	Workers will leave the Solar PV Site between 19:00 and 20:00 hours, as per Table 6. There is an error in the lines in Table 7, which should show departures in the 19:00-20:00 time period, rather than 18:00-19:00 hours time period. Minibuses will serve the Solar PV site only. Minibuses would not be used to transport workers to the grid connection corridor work areas.
1.10.17	Applicant	Please: a) clarify whether the upgrading of Sykehouse 29 and Fenwick 12 to bridleways would alter the assessment of magnitude and harm detailed within the ES Chapter 12: Socio-Economics and Land Use [REP1-013] for these PRoW. b) explain what additional mitigation measures may be required to accommodate equestrians on these PRoWs. c) confirm what discussions and outcomes have taken place with the landowner of the land where the proposed upgrade of the PRoW is to take place. d) There is no mention of the bridleway upgrade in the fPRoWMP [REP1-027]. Please outline what specific measures may need to be amended/ accommodated in this document to ensure it is adequately covered.	a). The upgrading of Sykehouse 29 and Fenwick 12 to bridleways would not alter the assessment detailed within **ES Volume I Chapter 12: Socio-Economics and Land Use [REP1-013]** for these PRoW, which finds the magnitude of impact to be low and the effect to be negligible. b). Appropriate signage would be introduced to denote the routes as bridleways and where required other measures such as widening (where practical) would be considered. c). It should be noted that the proposed upgrade of these PRoW from Footpaths to Bridleways is not proposed by the Applicant, and is not part of the Scheme. Discussion has taken place between the Applicant and landowner, which concluded that the landowner was resistant to the third party proposed change from a footpath to a bridleway. However, the landowner understands that City of Doncaster

ExQ1	Respondent	Question	Applicant's Response
		e) confirm the increase in distance for users of these PRoW and what is minimal level of harm as specified in the Planning Statement [APP-190].	Council will liaise with them over the application to discuss further. d). Details mentioned in response b). have been accommodated in Section 3.5 of the **Framework PRoW Management Plan [REP1-027]**. Section 3.5.1 of the F-PRoWMP has been updated at Deadline 2 (Revision 02) **[EN010152/APP/7.13]** to specifically refer to instances where existing PRoW are to be upgraded. Furthermore, a new Pararapgh 1.2.8 has been added to ensure that future changes to the Definitive Map would be adequately accommodated in the PRoWMP. This states *"It is understood that there are proposals to upgrade footpaths Sykehouse 29 and Fenwick 12 to Bridleways. Should these proposals be formally adopted in the Definitive Map, they will be fully considered in the detailed PRoW MP and managed accordingly. This would apply to other changes to the Definitive Map which may occur during the lifespan of the project."* e). As set out at Pararapgh 12.7.32 of **ES Chapter 12: Socio-Economics and Land Use [REP1-013]**, the increase in distance for users of these PRoW would be approximately 40 m. The Examining Authority's reference to 'minimal level of harm' is assumed to relate to paragprahs 6.13.18 and 6.12.27 and Appendix B (pages 317 and 451) of the **Planning Statement [APP-246]** which states *'The permanent diversions of these PRoW would increase their journey length by minimal distances*

ExQ1	Respondent	Question	Applicant's Response
			(less than 50 m)…' The reference to 'minimal' in these paragraphs relates to the distance of the diversion and does not relate to harm caused by the diversion.
1.10.18	Applicant	Please signpost where within the fPRoWMP [REP1-027] there are details on the specification of any gates that may be installed as part of the proposal.	Reference is made in Section 4.1.2 of the **Framework PRoW Management Plan** (Revision 02) **[EN010152/APP/7.13]**as to the potential introduction of gating to control areas where the internal maintenance route crosses or uses any existing PRoW. This Framework document does not include the specification of gates, as this will be agreed with City of Doncaster Council through the production of a Detailed PRoWMP post consent, which is secured by Schedule 2, Requirement17 of the **Draft DCO [REP1-005]**.
1.10.19	Applicant	Please provide details of what protective fencing/ barriers would be in place along any access track that is running within 10m of a PRoW and how it would be secured. It is noted that a temporary barrier would go in along Haggs Lane, but no details are provided within the fPRoWMP [REP1-027] or for any fencing. Paragraph 12.7.29 of ES Chapter 12: Socio-Economics and Land Use [REP1-013] states that the hedge would be trimmed to allow a minimum legal width but such provision is not set out in the FPRoWMP.	The Applicant has added the following text to Paragraph 3.5.1 of the **Framework PRoW Management Plan** (Revision 02) **[EN010152/APP/7.13]:** *temporary fencing will be installed along the length of any construction access track that lies within 10 metres of a public right of way. The fencing will serve to clearly demarcate the construction corridor, restrict unauthorised access to construction areas, and minimise potential conflict between construction traffic and public path users.* The F-PRoWMP, as above, sets out the principles of the management and mitigation measures which would be applied. The details of the measures, e.g. what type of fencing, will be agreed with City of

ExQ1	Respondent	Question	Applicant's Response
			Doncaster Council through the production of a Detailed PRoWMP post consent, which is secured by Schedule 2, Requirement17 of the **Draft DCO [REP1-005]**.
1.10.21	Applicant	Please signpost where the definition of 'high importance', 'medium importance', 'low importance' and 'very low importance' is within the ES Chapter 12: Socio-Economics and Land Use [REP1-013] and how these criteria of importance have been established.	As set out in **ES Volume I Chapter 12: Socio-Economics [REP1-013]** Table 12.5, the 'importance' of a PRoW is considered in determining the sensitivity of PRoW, alongside the availability of alternative substitute PRoW. The criteria used to define importance as high, medium, low or very low have not been defined within Table 12.5 but the text within the assessment section (e.g. Pararapghs 12.7.29 to 12.7.35) explains how the category of importance has been assigned. The categorisation reflects whether the PRoW connects rural locations to employment opportunities or services, how much a PRoW is used, and for recreational routes whether status has been assigned (e.g. national trail).
1.10.22	Applicant	fPRoWMP [REP1-027] paragraph 2.1.4 states that Fenwick 3 interacts with the order limits at the site accesses for vehicles. Please explain how Fenwick 3 would interact with the order limits site access when it lies north of Access Point 4 and no vehicles associated with the proposal would be travelling north beyond this point. Please explain why Moss 7, Moss 9 and Moss 11 are not included in the list within this paragraph.	Fenwick 3 interacts with an area of the order limits to the north of Access 4 on Fenwick Common Lane, which has been included to facilitate potentially required improvements to the junction visibility splay. This is also the case for Moss 7 and 9, which would interact with the order limits associated with Access 1, however these were not referenced in the chapter. Moss 11 does not appear to interact with any part of the order limits and therefore is not included.

ExQ1	Respondent	Question	Applicant's Response
1.10.23	Applicant	Grid connection corridor. Please: a) provide a list of which PRoW are expected to be temporarily diverted or stopped up during the grid connection corridor works or signpost where within the documentation this information is contained. b) provide a list of those PRoW that would not be diverted or stopped up that cross the order limits and provide an explanation as to how those PRoW would be safeguarded. c) provide details for what specific embedded mitigation measures there would be for any PRoW that interface with the cable route corridor or signpost where this is detailed in the FPRoWMP. d) provide details of which PRoW will be impacted by short term trenching and how that would be mitigated and managed.	a) As set out in Table 2 of the **Framework Public Rights of Way Management Plan (fPRoWMP)** (Revision 02) **[EN010152/APP/7.13]**, Moss 20, Moss 21, Thorpe in Balne 5, 6, 7, 8, 11 and 13 cross the Grid Connection Corridor Order limits. As set out in Pararapgh 3.4.2 of the fPROWMP, it is proposed to temporarily (and locally) divert these around each works area, for a short period of approximately 2–3 weeks each, when the cables are installed. b) The following public rights of way, or sections of public right of way, have not had any powers sought to divert, stop up or subject to any management measures over the extents shown in the **Streets, Rights of Way and Access Plans** (Revision 03) **[EN010152/APP/2.3]**: Moss-20, Moss-21, Thorpe in Balne-5, Thorpe in Balne-11. These are to remain on their existing alignment with no works undertaken due to the authorised development implementing a horizontal directional drill installation of the Grid Connection Corridor. Therefore, the cable installation will not require the physical excavation in the vicinity of the public right of way. c and d) Embedded mitigation measures to minimise the traffic impacts of the Scheme on any PRoW users during construction and decommissioning are set out at Paragraph 3.2.2 and include: maintaining access including minimum legal widths, providing sufficient protection/separation between PRoW and scheme infrastructure, managing areas where internal construction traffic

ExQ1	Respondent	Question	Applicant's Response
			routes crosses a PRoW, developing a communications strategy, and ensuring hazards (e.g. overhanging cables) are suitably clear of PRoW. Measures to manage temporary diversions due to short term trenching and ensure they are safe to use during construction are set out at Pararapgh 3.4.3 and include: giving advanced notice of where PRoW will be subject to management measures; traffic management where motorised vehicle use is planned; and use of manned controls and crossing points where the Scheme crosses PRoW (i.e. marshals or banksmen), with a default priority that construction traffic will give way to other users.
1.10.25	Applicant	ES Chapter 12: Socio-Economics and Land Use [REP1-013] states that Moss 6 and Fenwick 14 would be permanently diverted to follow the path of the construction access route. Please confirm what safeguard measures would be in place for users of these diverted routes when they are used by vehicles.	As specified in the **Framework PRoW Management Plan [EN010152/APP/7.13]**, during construction, Moss 6 will be diverted temporarily from aligning with the construction access road, approximately 250m north of the junction with Moss Road. The temporary diversion route will be located to the west of the construction access road for approximately 220m, with temporary fencing separating it from the new access track. Leading northbound from Moss 6, Fenwick 14 will follow the construction access route, again with temporary fencing separating it from the new access track. After the construction phase, this part of the access

ExQ1	Respondent	Question	Applicant's Response
			route will permanently become Fenwick 14. The **Framework PRoW Management Plan** (Revision 02) **[EN010152/APP/7.13]** has been updated to include mention of the above temporary fencing and submitted at Deadline 2. During operation, the proposed permanent diversion of the Moss 6 route will follow the path of the construction access route from Moss Road for approximately 470m, before rejoining the route of the current PRoW. After the construction phase, this part of the access route will permanently become Moss 6. This is due to the operational traffic volume numbers being substantially less than during the construction phase, meaning that the risk of instances of conflict with PRoW users would be minimal. Thus, Moss 6 will operate in a similar manner to how Fenwick 16 on Haggs Lane currently operates. It should also be noted that while this will be a diversion of the PRoW as recorded, it follows the route of the PRoW as currently used by local people, as noted by City of Doncaster Council. Details of measures designed to safeguard users of permanently diverted PRoW, have been included within section 3.3.2 of the **Framework PRoW Management Plan** (Revision 02) **[EN010152/APP/7.13].** The specifics will be agreed within the Detailed PRoW Management Plan.

ExQ1	Respondent	Question	Applicant's Response
11.	**Noise, vibration, air quality, and nuisance**		
1.11.1	Applicant	**Requirement 14 (Operational Noise).** Please explain why ES Chapter 11: Noise and Vibration, Section 11.7 (specifically paragraphs 11.7.14 – 11.7.17 'Operation and Maintenance') [APP-063] and #NV-08 - #NV-11 in the Environmental Commitments and Mitigation Register [APP-189] do not refer to Requirement 14. Please explain why these parts of the ES do not commit that noise levels at sensitive receptors will be no higher than those levels presented in Table 11-7 within the ES Chapter 11 i.e. less than or equal to +5dB above typical background level for the Lowest Observed Adverse Effect Level (LOAEL).	Paragraph 11.7.17 of **ES Volume I Chapter 11: Noise and Vibration [APP-063]** states: *"… the Applicant commits that noise at sensitive receptors will be no higher than the levels presented in Table 11-7. The measures to achieve this are discussed in Section 11.7 and are secured in the **Framework OEMP [EN010152/APP/7.8]** as a Requirement attached to the DCO".* So, although Requirement 14 of the DCO is not explicitly referred to, the commitment to the predicted noise levels in Table 11-7 of Chapter 11 is clearly stated.
1.11.3	Applicant	**ES Chapter 11: Noise and Vibration Table 11-2: Noise Sensitive Receptors [APP-063].** There appears to be a typo of Bale Lane instead of Bate Lane. Please explain why West End Farm on West Lane (R8) was chosen as a representative sensitive receptor instead of The Dovecote on West Lane.	It is acknowledged that Table 11-2 of **ES Volume I Chapter 11: Noise and Vibration [APP-063]** contains a typo and should refer to 'Bate Lane' instead of 'Bale Lane'. To assess noise and vibration effects, representative sensitive receptors were chosen as assessment locations. These locations were selected such that they are representative of other sensitive receptors in the general area. This would allow an indication of the noise and vibration effects that all nearby receptors may experience. The Dovecote is next door to West End Farm and would experience similar levels of noise and vibration from the Proposed Development as West End Farm. As such,

ExQ1	Respondent	Question	Applicant's Response
			the assessment of noise and vibration effects at R8 is intended to cover both West End Farm and The Dovecote as there would be no material difference in the level of noise experienced at each property.
1.11.4	Applicant	**ES Chapter 11: Noise and Vibration paragraph 11.4.20 [APP-063].** Please confirm the non-unattended noise monitoring locations are ML1-ML9.	Table 11-3 of **ES Volume I Chapter 11: Noise and Vibration [APP-063]** provides a list of monitoring locations. ML1-ML9 were unattended monitoring locations and ML10-ML22 were attended monitoring locations.
1.11.5	Applicant	**ES Chapter 11: Noise and Vibration paragraph 4.2.1 [APP-063].** This paragraph states that cable laying would mainly be restricted to core daytime work hours so attended measurements were collected during the daytime only. This paragraph does not include potential 24 hour working for Horizontal Directional Drilling (HDD) operations that may need to take place. Please explain what 'mainly' means in the context given in this paragraph. Please explain what the anticipated noise levels and duration of working environment would be? Please confirm the duration of the short-term noise measurements collected.	The word 'mainly' applies as HDD activities are only likely to be required at night for up to three days. The HDD noise level predictions at sensitive receptors are provided in Table 11-13 of **ES Volume I Chapter 11: Noise and Vibration [APP-063]**. Attended sound monitoring at receptor locations along the Cable Corridor route focussed on the daytime period. Given the short duration of potential HDD night-time activities, this was considered to be a reasonable approach. It should be noted that baseline ambient conditions would only affect the assessment if they were higher than the defined night-time LOAEL of 45 dB LAeq,T. In this case, the LOAEL would be increased to match the measured ambient sound level. As such, the assessment of HDD noise is precautionary by applying the minimum LOAEL.

ExQ1	Respondent	Question	Applicant's Response
1.11.7	Applicant	**ES Chapter 11: Noise and Vibration paragraph 11.8.15 and 11.8.16 [APP-063].** These paragraphs state "*the LOAEL is not exceeded at any of the receptor locations so construction noise effects from NGA2 are not significant. However, the LOAEL is exceeded at some receptor locations and adverse levels of noise are identified*" and goes on to state "*although adverse levels of noise are identified at some receptors, NPSE requirements are met through provision of embedded mitigation*". Please explain how these paragraphs align with Table 11-11 which only identifies noise levels during daytime construction activity as below LOAEL.	Paragraphs 11.8.15 and 11.8.16 of **ES Volume I Chapter 11: Noise and Vibration [APP-063]** contain legacy text from the Noise and Vibration Preliminary Environmental Information Report and were not correctly updated for the ES. The paragraphs should identify that the construction noise LOAEL is not exceeded at all receptors. This error does not affect the conclusions of the chapter.
1.11.9	Applicant	**ES Appendix 11-4: Construction and Operation and Maintenance Noise Modelling Section 1.3 Construction Vibration [APP-172].** Please confirm which of the data on bored piling activities and data for driven piling activities would be associated with HDD.	Paragraph 11.8.33 of **ES Volume I Chapter 11: Noise and Vibration [APP-063]** states that "*HDD activities would generate similar levels of vibration to bored piling*". As such the HDD vibration assessment was undertaken with reference to data presented in Plate 2 of Appendix 11-4 **[APP-172]**.
1.11.10	Applicant	**ES Appendix 11-4: Construction and Operation and Maintenance Noise Modelling Section Table 2 [APP172] and ES Appendix 13-2: Traffic Flow Diagrams [APP-177] and ES Appendix 13-4: Transport Assessment [APP-179].**	Table 2 of **ES Volume III Appendix 11-4 [APP-172]** contains a typo and should refer to a future baseline of 2028, which is the peak construction traffic year. It is confirmed that the data contained within Table 2 is 2028 traffic data.

ExQ1	Respondent	Question	Applicant's Response
		Please comment on why the base year within Table 2 of ES Appendix 11-4 is 2026 whereas the base year in ES Appendices 13-2 and 13-4 are 2028.	
1.11.11	Applicant	**ES Appendix 11-4: Construction and Operation and Maintenance Noise Modelling Section paragraphs 1.5.8 – 1.5.10 [APP-172]** States the generator has a reported sound pressure level of 74.7 dB(A) when measured at 7m and it is assumed it would only operate to a maximum of 8 hours in any one year. What mitigation measures would be in place should the generator operate beyond 8 hours in any one year and how would this be monitored?	Paragraph 2.6.29 of **ES Volume I Chapter 2: The Scheme [APP-059]** states that, "*For the purposes of assessment, it is assumed that the backup generator will operate for up to a maximum of eight hours in any one year*". Sensitivity testing of noise emissions from the backup generator was undertaken assuming it was operating permanently in addition to other solar farm infrastructure. The sensitivity testing identified that the use of the backup generator would not result in a material change in noise levels at sensitive receptors i.e. changes in noise at sensitive receptors would be less than 1 dB and not perceptible. As such, no additional mitigation measures were necessary.
1.11.12	Applicant	**ES Appendix 11-4: Construction and Operation and Maintenance Noise Modelling Section paragraph 11.7.13 [APP-172]**. This paragraph states that consideration has been given to traffic routing, timing and access points to minimise noise impacts at existing receptors and HGVs managed through the CTMP with appropriate routing of construction and decommissioning traffic on public roads and along the access track within the CTMP.	Details on construction traffic routing and access points are provided in response to question 1.10.2. The worst case number of daily HGVs accessing one particular access point on the grid connection corridor would be 3 in and 3 out (6 two-way). This number of daily vehicle movements at access points is not sufficient to result in adverse noise impacts and, as such, no noise mitigation is provided in the **Framework Construction Traffic Management Plan [APP-251 and APP-252]**.

ExQ1	Respondent	Question	Applicant's Response
		Please signpost where the information within the ES and fCTMP that explains the expected numbers of HGVs to access/ egress Access Points 2, 3, 5, 6, 7, 8, 9, 10 and 11 on a daily basis and over what time period can be found; and explain how minimisation of noise impact on receptors has been considered based on those numbers. Please signpost where within the fCTMP it explains what the access route and access points along the cable route would be and what vehicles are expected to use those access points.	
1.11.13	Applicant	**ES Chapter 11: Noise and Vibration paragraph 11.7.11 [APP-063]** States that "*prior to commencement of any construction activities the Applicant will submit a voluntary application for prior consent to carry out noisy work under S61* […]". However, the fCEMP [REP1-019] paragraph 2.5.1 and #NV-04 of the Environmental Commitments and Mitigation Register [APP-189] states that where on site works are to be conducted outside the core working hours, it is intended that the applicant will voluntarily apply for S61 consent under the Control of Pollution Act 1974. Please confirm whether a S61 consent would be obtained prior to commencement of any construction activities or only for those activities outside core working hours.	It is confirmed that a voluntary Section 61 application would be for any works that are required outside of core construction work hours, as outlined in the fCEMP and Commitments and Mitigation Register. Paragraph 11.7.11 of the latter document was incorrectly drafted and is intended to read that "*prior to commencement of any construction activities outside of core construction work hours, the Applicant will submit a voluntary application for prior consent to carry out noisy work under s 61"*

ExQ1	Respondent	Question	Applicant's Response
1.11.14	Applicant	**ES Chapter 11: Noise and Vibration paragraph 11.7.12 [APP-063] and fCEMP page 69 [REP1-019].** The hierarchy of mitigation measures for continuous HDD activities at night appears not to align between ES Chapter 11 and the fCEMP. The fCEMP appears to omit the use of the option for open cut cable laying as an alternative. Please confirm whether it is intended that the fCEMP should not contain all the mitigation hierarchy as set out in paragraph 11.7.12 within ES Chapter 11; and if so why.	HDD (or an alternative such as such as micro-tunnelling and boring) would be used where it is not possible for open cut cable laying to occur. As such, item b. should be omitted from the hierarchy of measures in Paragraph 11.7.12 of **ES Volume I Chapter 11: Noise and Vibration [APP-063]**.
1.11.15	Applicant	ES Chapter 11: Noise and Vibration paragraph 11.7.12 [APP-063] and fCEMP paragraph 2.5.2 [REP1-019] states that acoustic barriers are proposed where nighttime HDD works are required to take place within 200m of a sensitive receptor. Please explain why acoustic barriers are not to be installed and used when HDD operations are taking place within 200m of a sensitive receptor during the daytime.	Table 11-13 of **ES Volume I Chapter 11: Noise and Vibration [APP-063]** identifies that the highest level of HDD noise at a sensitive receptor at a distance of 75m of 65dB $L_{Aeq,T}$. In accordance with noise criteria in Table 11-4 of **ES Volume I Chapter 11: Noise and Vibration [APP-063]**, this level of noise is not a significant effect during the daytime period; however, a significant effect is identified during the night-time period. As such, mitigation in the form of acoustic barriers is proposed.
1.11.16	Applicant	**ES Chapter 11: Noise and Vibration** paragraph 11.8.18 [APP-063] states that as the drilling activities at the entry pit would generate the highest level of noise, calculations of noise have been based on a reasonable worst-case scenario that all potential HDD are entry pits. Based on Figure 2-4 Location of Temporary Construction Compounds and Indicative HDD Areas [APP-075], please explain which the	**Figure 2-4 Location of Temporary Construction Compounds and Indicative HDD Areas [APP-075]** indicates the locations of the two Drill entry pit/drill exit pit at each trenchless crossing. One of the Order limits would be the drill pit and the other would be the reception pit. As it is uncertain which of the two sites at each Drill entry pit/drill exit pit location would be the drill pit and which would be the

ExQ1	Respondent	Question	Applicant's Response
		HDD entry points are to appreciate the location of the worst-case scenario for sensitive receptors.	reception pit, the approach to noise modelling assessed each Drill entry pit/drill exit pit as a drill pit. This was a reasonable worst-case approach as noise emissions from the drill pit site are greater than noise emissions at the reception pit.
1.11.17	Applicant	**ES Chapter 11: Noise and Vibration** paragraphs 11.8.22 – 11.8.23 [APP-063]. Please confirm if other mitigation measures have been explored or considered for receptors R12, R17 and R31 to reduce the significant effect of noise from HDD activities.	The most effective methods for reducing noise from construction activities is to reduce noise at source through either screening noise sources or through use of quieter plant. As a detailed method for HDD works, including specific types of plant, will not be completed until a Principal Contractor is appointed, the most effective mitigation measure which can be proposed at this stage, is through the use of screening by acoustic barriers. As such, for this stage of the project, such appropriate mitigation measures have been explored to avoid exceedances of the night-time Significant Observed Adverse Effect Level (SOAEL). Additional measures can be adopted when the Principal Contractor are preparing their method statement for HDD works. Any additional mitigation measures, including appropriate selection of drilling plant and final drill pit locations, would be discussed with the Local Authority through the Section 61 process.
1.11.18	Applicant	**ES Chapter 11: Noise and Vibration paragraphs 11.8.26 – 11.8.33 [APP-063].** Paragraph 11.8.26 states that driving piling vibration calculations are	Paragraph 11.8.26 and Paragraph 11.8.33 of **ES Volume I Chapter 11: Noise and Vibration [APP-063]** incorrectly reference **ES Volume III Appendix**

ExQ1	Respondent	Question	Applicant's Response
		based on regression analysis of driven piling data from Table D.2 of BS 5228-2 presented in ES Appendix 11-3: Baseline Noise Survey [APP-171]. Paragraph 11.8.27 states that regression analysis identifies that the SOAEL is potentially exceeded at receptors less than 60m from driven piling activities. Paragraph 11.8.33 says that bored piling calculations which would generate similar vibration levels to the proposed HDD activities, are also presented in ES Appendix 11-3. Please signpost where within ES Appendix 11-3 the piling data, the vibration information and data; and the regression analysis is located.	**11-3** [**APP-171**] and should contain reference to **ES Volume III Appendix 11-4 [APP-172]**.
1.11.19	Applicant	**ES Chapter 11: Noise and Vibration paragraphs 11.8.27 – 11.8.29 and Table 11-5: Thresholds of Potential Effects of Construction and Decommissioning Vibration (Human Response) [APP-063].** Please explain: a) why paragraph 11.8.27 says the Significant Observed Adverse Effect Level (SOAEL) for vibration levels is 1.5mm/s whereas Table 11-5 says the SOAEL is 1.0mm/s. b) if a SOAEL of 1.0mm/s instead of 1.5mm/s changes the conclusions set out in paragraphs 11.8.28 and 11.8.29. c) if a SOAEL of 1.0mm/s instead of 1.5mm/s is used, if this affects the findings of paragraph 11.8.27	a) Paragraph 11.8.27 of **ES Volume I Chapter 11: Noise and Vibration [APP-063]** contains a typo and should reference the SOAEL of 1.0 mm/s. b) and c) This typo does not affect the contents of Pararapghs 11.8.27 to 11.8.29, which are made with reference to a construction vibration SOAEL of 1.0 mm/s. d) R33 is located approximately 40m from Field SE2. As a worst-case, it is assumed that piling could potentially occur up to the boundary of Field SE2 so the construction vibration assessment represents a worst-case scenario. Consequently, there is no area of Field SE2 within 40m of R33.

ExQ1	Respondent	Question	Applicant's Response
		with regards to the number of receptors where ground borne vibration effects are not significant. d) paragraph 11.8.28 says that approximately 5% of the area of Field SE2 is within 60m of R33. As paragraph 11.8.27 says that R33 is located at a distance of approximately 40m from potential piling activities in Field SE2, what percentage of the area of Field SE2 is within 40m of R33	
1.11.20	Applicant	**ES Chapter 11: Noise and Vibration paragraphs 11.8.38 – 11.8.39 [APP-063].** These paragraphs discuss changes in road traffic noise during the construction phase using a qualitative assessment. For Fenwick Common Lane it states that construction traffic noise effects would be negligible and not significant. This comment is based on approximately 16 light goods vehicle movements per hour. As 92 vehicles are proposed to access Fenwick Common Lane during AM development peak (0600-0700) (source Table 16: 2028 Baseline Traffic and Construction Traffic, ES Appendix 13-4: Transport Assessment [APP-179]) representing a 763.1% increase in traffic movements, please explain how this aligns with the conclusion in paragraph 11.8.39.	The assessment of construction traffic noise effects is undertaken over a day. This is in line with the approach set out in Design Manual for Roads and Bridges (DMRB) LA 111. Whilst there is 92 light vehicle movements forecast during the peak AM period, this is not considered to be a substantiative number of traffic, particularly as light vehicles already use Fenwick Common Road so receptors would not be experiencing new/different types of vehicles. At worse, it is considered that if you assessed the change in the number of vehicles during the AM period as a discrete period, this change could be sufficient enough to identify a Minor Adverse effect; however, this is not a significant effect, and the conclusions of the construction traffic assessment would be unchanged. This should also be considered within the context that there is minimal light vehicle construction traffic outside of the peak AM period.

ExQ1	Respondent	Question	Applicant's Response
1.11.21	Applicant	**ES Chapter 11: Noise and Vibration Table 11-13: HDD (NGA3) Noise Levels [APP-063].** Please confirm if the noise levels given in this table are for daytime or nighttime periods.	HDD noise levels in Table 11-13 are for the HDD activity during any time of day (ie the noise levels coming from the HDD itself would not change regardless of the time of day, other than in respect of any additional mitigation applied); however, the assessment of HDD noise focuses on the night-time period as that is when worst-case noise effects would occur.
1.11.22	Applicant	**ES Chapter 11: Noise and Vibration [APP-063].** Chapter 11 and its technical appendices provide an assessment of the likely significant effects from construction noise, operational and maintenance noise; and construction and decommissioning traffic noise. Please signpost where in Chapter 11 (or its technical appendices) there are details of a cumulative assessment for sensitive receptors that could be affected by both construction and decommissioning noise and construction and decommissioning traffic noise.	Construction and decommissioning traffic noise are assessed as an intensification of an existing road traffic noise source. However, construction and decommissioning noise is a new source of noise and absolute levels of noise are assessed. As such, each assessment is intrinsically different and are not normally assessed as a cumulative effect. However, it can be noted that no significant residual effects are identified as a result of construction and decommissioning noise nor construction or decommissioning traffic noise (see section 11.10 of **ES Volume I Chapter 11: Noise and Vibration [APP-063]**). As such, there is no likelihood that cumulative significant effects would occur from both sources.
1.11.23	Applicant	**The Environmental Commitment and Mitigation Register #NV-02 [APP-189].** There appears to be a duplication within this commitment. Please comment. • Should item b. consider the use of multiple display boards at different locations around the site.	It is acknowledged that #NV-02 of the **Environmental Commitment and Mitigation Register [APP-189]** contains duplicated text in the final paragraph.

ExQ1	Respondent	Question	Applicant's Response
		• For item c. should the logbook of complaints include information on complaint resolution and outcome.	Item b. should be amended to include reference to 'multiple display boards at different locations around the Order limits. Item c will include information on complaint investigation and outcome.
1.11.24	Applicant	**The Environmental Commitment and Mitigation Register #NV-07 [APP-189].** Please comment on whether the fCTMP should be included within the column 'Commitment Securing Mechanism' for this commitment.	#NV-07 in the **Environmental Commitment and Mitigation Registe**r **[APP-189]** should reference Requirement 13.
1.11.25	Applicant	The Environmental Commitment and Mitigation Register #NV08/ 09 and 10 [APP-189] all incorrectly refer to Requirement 13 fOEMP. We believe this should read Requirement 12 fOEMP.	It is acknowledged that the **Environmental Commitment and Mitigation Register [APP-189]** incorrectly references Requirement 13 at #NV08/ 09 and 10 and should reference Requirement 12.
1.11.26	Applicant	The Environmental Commitment and Mitigation Register #NV-12 [APP-189] states the distance to sensitive receptors would be kept as large as reasonably practicable with a minimum distance of 85m between HDD work sites and sensitive receptors. Please explain: a) the basis for 85m minimum distance set out in #NV-12 and what circumstances or criteria would trigger this minimum distance and why a larger distance is not sought. b) why HDD2 location is 75m from sensitive receptors (Bethal House, Blossom Cottage) and	a) The minimum distance of 85 m is the distance at which HDD noise is calculated at 64 dB LAeq,T. Assuming barriers would provide 10 dB attenuation, this would attenuate noise to a level below the 55 dB LAeq,T SOAEL. The 85 m distance is identified in Paragraph 11.10.5 of **ES Volume I Chapter 11: Noise and Vibration [APP-063]** as additional mitigation. b) Table 3-7 of the **Framework Construction Environmental Management Plan [REP1-019]** commits to a minimum distance of 85m from an HDD location to a sensitive receptor. The nearest site boundary is the southern site of HDD2 at 75m from Bethal Green and Blossom Cottage and the far

ExQ1	Respondent	Question	Applicant's Response
		what mitigation measures would be necessary to ensure no impact on these receptors. Please confirm what monitoring would be undertaken when operating at a minimum distance of 85m to ensure no harm to sensitive receptors particularly at nighttime and if mitigation is required what that would be; or signpost where within the documentation this is detailed.	boundary is approximately 105m away. The assessment of HDD noise assumes a worst-case distance of 75m; however, HDD activities could take place at any location within this range of distance. It should be further noted that there are two HDD2 sites; a drive pit site and a reception pit site. Depending on ground conditions, the northern site could be selected for the drive pit, which is a minimum of 120m from Bethal Green and Blossom Cottage. As such, the commitment of a minimum distance of 85m to a receptor will be achievable, c) A commitment to undertake construction noise monitoring is provided in Table 3-7 of the **Framework Construction Environmental Management Plan [REP1-019]**. A detailed construction noise monitoring will be prepared once a Principal Contractor has been appointed and a construction method statement has been prepared. The construction noise monitoring plan will be agreed with the local planning authority and submitted in the detailed CEMP.
12.	**Socio-economics, tourism, and recreation**		
1.12.1	Applicant	The Framework Skills, Supply Chain and Employment Plan (fSSCEP) [APP-204]. ES21 Opportunity 3 – STEM Education and Careers says the applicant is exploring the use of a community benefit fund as part of the scheme. Please provide further details on the fund and whether, (and if so	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 fund upon operation of the Scheme. The

ExQ1	Respondent	Question	Applicant's Response
		how) the applicant proposes to secure it in the dDCO.	terms of reference and administration of the fund will be developed with community representatives. The fund is a voluntary commitment by the Applicant and should not be considered in the overall planning balance.
1.12.4	Applicant	**The fSSCEP paragraph 2.2.9 [APP-204**]. Please signpost the actual figures for construction workers within the study area and outside the study area upon which the conclusions in this paragraph have been based.	**ES Volume I Chapter 12: Socio-Economics and Land Use [REP1-013]** Pararapgh 12.7.15 sets out that the labour pool of construction workers in the Study Area (60-minute travel area) is approximately 137,000, according to Business Register and Employment Survey (BRES) 2022 data. In Pararapgh 12.7.12, ES Chapter 12 sets out the Scheme would support, on average, 225 total net jobs per annum during the construction phase, of which 102 jobs per annum would be expected to be taken up by residents within the Study Area (it is estimated that 45% of construction staff can be sourced from within the Study Area).
1.12.5	Applicant	**The fSSCEP paragraph 2.2.10 and Table 2: Gross Direct Value Added Per Annum from the Scheme During the Construction Phase [APP-204].** Please explain the differences in numbers given in paragraph 2.2.10 for the estimated amount construction would contribute to Yorkshire and Humber of £14.3Mpa compared to Table 2 of £12.6Mpa.	The figures presented in Table 2 of the **Framework Skills, Supply Chain and Employment Plan (fSSCEP) [APP-204]** are correct, while the text in Paragraph 2.2.10 is incorrect. The correct estimate of Gross Direct Value Added (GVA) per annum to the Yorkshire and Humber region during the construction phase is £12.6 million, as stated in Paragraph 2.2.10 of the fSSCEP. This inconsistency does not affect the conclusions or overall outcomes of the fSSCEP. The estimate of £12.6 million is used

ExQ1	Respondent	Question	Applicant's Response
			within **ES Volume I Chapter 12: Socio-Economics and Land Use [REP1-013]** (Pararapgh 12.7.24).
1.12.6	Applicant	ES Chapter 12: Socio-Economics and Land Use Table 12-20: Business Premises Within 500m of the grid connection corridor [APP-064]. Please comment why Branson Haulage are not contained within this table.	Branson Haulage was omitted in error from Table 12.20 within **ES Volume I Chapter 12: Socio-Economics and Land Use [REP1-013]**. Had it been included, the finding of a minor adverse (not significant) effect on business premises would remain unchanged. There would be no temporary or permanent land take from the business during the Scheme. Access to the property would be maintained, though during construction there would be some increase in traffic along Moss Road, as set out in **ES Volume III Appendix 13-4: Transport Assessment [APP-179**].
1.12.8	Applicant	ES Appendix 12-2 Minerals Safeguarding Report [APP-174]. Please confirm the length of the grid connection corridor that would affect the minerals safeguarding area (MSA). Paragraph 2.3.3 of the Minerals Safeguarding Report states that approximately 1.47km is located within the MSA and a further 1.1km within the MSA buffer however paragraph 6.2.5 states that the maximum length of the grid connection corridor which overlies safeguarded mineral is around 3-4km in length "therefore the land take associated with the Grid Connection Cables is relatively small as it will be a narrow linear feature". Please explain this disparity and then how the land take would be relatively small	The distance of 3–4km referenced in Paragraph 6.2.5 of the Minerals Safeguarding Report was included in error. The correct figure is that stated in Pararapgh 2.3.3: approximately 1.47km of the grid connection corridor lies within the Minerals Safeguarding Area (MSA), with a further 1.1km within the MSA buffer. The total length of the grid connection corridor is approximately 5.6km. Despite this total length, the associated land take remains relatively small due to the narrow and linear nature of the grid connection infrastructure.

ExQ1	Respondent	Question	Applicant's Response
		given paragraph 2.3.3 says the total length of the grid connection corridor would be 5.6km.	
13.	**Other planning matters**		
Waste			
1.13.1	Applicant	Paragraph 4.1.2 of the framework Site Waste Management Plan (fSWMP) [APP-208] states that excavated material is not included in the construction waste estimates or when calculating the overall waste recovery rate as the material would be reused on site where practicable. Please provide details on what activities would generate excavated waste, what the excavated waste would be comprised of and where it is anticipated this waste would be used on site to avoid removal. It is noted that paragraph 2.1.2(e) of the fSMP [APP-199] only refers to subsoil being retained on site for landscaping whereas paragraph 6.2.2 of the fSWMP refers to all soil. Please also confirm that excavated soils from the temporary compound areas would be held in stockpiles before being returned to the area they were stripped from.	As stated in Paragraph 4.1.3 of the **Framework Site Waste Management Plan [APP-208]** *"It is expected that all materials removed by cable trenching operations or in the creation of working or laydown/compound areas will be reinstated again with no import or export of materials being required."* Excavated materials are anticipated to be topsoil and subsoil. The **Framework Construction Environmental Management Plan [REP1-019]** states that *"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"* The **Framework Construction Environmental Management Plan [REP1-019]** Table 3-9 Soils and Agricultural Land states that "*soils of different types*

ExQ1	Respondent	Question	Applicant's Response
			will be stored separately. Clear records of the stockpiles (including annotated plans) will be maintained." The Applicant confirms that excavated soils from temporary construction compound areas will be stockpiled within the Order Limits for the duration of the construction phase and subsequently returned to the areas from which they were stripped. This approach ensures that soil integrity is maintained and supports the restoration of land to its original condition. The detailed Soil Management Plan (SMP), to be developed in consultation with the appointed contractor, will identify the specific locations for soil stripping and stockpiling, and include mapping to ensure that soils are reinstated in their area of origin.
1.13.2	Applicant	Please explain why the likely impact of an increase in the volume of materials having to be recycled locally, regionally and nationally has not been included at paragraph 14.8.62 of ES Chapter 14: Other Environmental Topics [APP-066] as a likely impact and effect.	The Materials and Waste assessment outlined in **ES Volume I Chapter 14: Other Environmental Topics [APP-066]** follows the methodology set out in the Institute of Environmental Management and Assessment (IEMA) guide to: Materials and Waste in Environmental Impact Assessment, Guidance for a Proportionate Approach (referred from herein as the 'IEMA Guidance'. Page 14 of the IEMA Guidance states *"this guidance does not consider waste*

ExQ1	Respondent	Question	Applicant's Response
			processing and recovery facilities as sensitive receptors, rather: they are part of a system that has the potential to reduce the magnitude of adverse impacts associated with waste generation and disposal. Waste processing and recovery facilities are, hence, different to landfills, in that the latter are finite resources."
1.13.3	Applicant	Paragraph 6.6.1 of the fSWMP [APP-208] says that excavated soils and earthworks materials would be stored onsite in stockpiles until required for use. There is a reference to the fSMP [APP-199]. The fSMP only refers to the storage of top and subsoils not excavated materials. Please clarify which document and where details for the methodology and location of excavated earthwork materials would be contained.	Excavated materials on the Scheme consist of topsoil and subsoil. No other excavated materials are anticipated. As stated in paragraph 2.1.1-2.1.2 of the **Framework Soil Management Plan (FSMP)** (Revision 01) **[EN010152/APP/7.10]** *"The Framework SMP will be reviewed and updated prior to commencement of the construction phase to consider additional site-specific soils data complied via the pre-commencement soil surveys and any other relevant data to become the detailed SMP.* *The detailed SMP will include the following:* *a. Maps showing topsoil and subsoil types, and the areas to be stripped* *and left in-situ;* *b. Methods (including machinery) for stripping, stockpiling, respreading,* *and ameliorating the soils;* *c. Maps showing locations of soil stockpiles and content (e.g. Topsoil type A, subsoil type B);* *d. Schedules of volumes for each material;*

ExQ1	Respondent	Question	Applicant's Response
			e. Expected after-use for each soil, for example whether topsoil to be used on site, used, or sold off site, or subsoil to be retained for landscape areas, used as structural fill or for topsoil manufacture; and f. Identification of person responsible for supervising soil management, building upon the roles and responsibilities set out in Section 1.2 of this Framework SMP."
1.13.4	Applicant	Paragraph 14.8.68 of ES Chapter 14: Other Environmental Topics [APP-066] says that excavated material is not included in the construction waste estimate or when calculating the overall waste recovery rate as it would, where practicable, be reused on site and therefore not be categorised as waste. Paragraph 14.8.69 then says that total excavated material for the cable route trench dimensions would be approximately 42000m3. Please clarify what would be the intended end use for that 42000m3 and how would that align with the embedded mitigation referred to in paragraph 14.8.49 and good practice waste recovery.	As stated in Paragraph 4.1.3 of the **Framework Site Waste Management Plan [APP-208]** "*It is expected that all materials removed by cable trenching operations or in the creation of working or laydown/compound areas will be reinstated again with no import or export of materials being required."* The Framework Construction Environmental Management Plan [APP-196] states that "*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".* This aligns with applying the waste hierarchy, specifically preparing for reuse.

ExQ1	Respondent	Question	Applicant's Response
1.13.5	Applicant	Please provide details on the failure rate of the solar PV panels on a yearly basis.	The Applicant anticipates that between 34-68 panels may need to be replaced per year based on a 0.25%-0.5% annual replacement rate.
1.13.6	Applicant	Table 14-25 within ES Chapter 14: Other Environmental Topics [APP-066] has columns for the amount of panel waste, other waste and total waste in tonnes. The rows within the table for total waste from cumulative developments, waste to landfill (realistic worst-case scenario), waste to landfill (absolute worst-case estimate); and regional landfill capacity are all in metres cubed (m3). It is unclear whether the figures provided for within these rows are in tonnes or m3. Please confirm and please provide the figures in both tonnes and m3. Please confirm what is anticipated to be the hazardous waste component in m3 of the solar panels.	Rows below *"TOTAL:"* in Table 14-25 within **ES Volume I Chapter 14: Other Environmental Topics [APP-066]** have specific units which are provided in the left hand column. E.g. *"Waste to landfill, m^3 (realistic worst case estimate with 70% recovery)."* Information on the m^3 of a solar panel that would be considered hazardous waste at disposal is not currently provided by manufacturers.
Ground Conditions and Land Contamination			
1.13.7	Applicant	Chapter 14: Other Environmental Topics [APP-066] and paragraph 2.10.4 of the fCEMP [REP1-019] refer to the potential for a Materials Management Plan (MMP) to be developed under the CL:AIRE Definition of Waste: Development Industry Code of Practice. Please signpost the information outlining what the trigger would be, and when it would be triggered, for the production of a MMP. Please clarify why the production of a MMP is not included within Table 3-16 within the fCEMP. Please clarify why a	The need for a Materials Management Plan (MMP) developed under the CL:AIRE Definition of Waste: Development Industry Code of Practice will be determined by the appointed construction contractor, based on the nature and extent of material reuse during construction. As such, a specific trigger point for its production has not yet been defined.

ExQ1	Respondent	Question	Applicant's Response
		reference to the CL:AIRE code has not been provided within the fSMP [APP-199].	A MMP is not included within Table 3-16 of the **fCEMP [REP1-019]** because the requirement for its preparation has not been confirmed at this stage. Reference to the CL:AIRE Code has not been included in the **fSMP [APP-199]** as the fSMP focuses specifically on the management and protection of agricultural soils, rather than broader materials reuse or waste management processes
1.13.10	Applicant	The Environment Agency's relevant representation [RR-003] has stated that refuelling should take place on impermeable surfaces. Please explain why this is not contained within the Mitigation and Commitment Register [APP-189] or the fCEMP [REP1-019].	The **fCEMP** (Revision 02) **[EN010152/APP/7.7]** has been updated to include the requirement for refuelling to take place on impermeable surfaces. The fCEMP has been resubmitted at Deadline 2.
1.13.11	Applicant	ES Appendix 14-4: Phase 1 Preliminary Risk Assessment – grid connection corridor [APP-184]. Please provide context as to what the figures in Table 3-2: Estimated Soil Chemistry column 2 'Estimated Geometric Mean Concentration 9mg/kg)' means for each potentially harmful element and each Section and where those definitions originate.	Table 3-2 **of ES Volume III Appendix 14-4: Phase 1 Preliminary Risk Assessment – grid connection corridor [APP-184]** gives the likely background concentration for five different elements in topsoil. These background levels can exist due to natural geological conditions or possible anthropogenic contamination. Due to the size of the grid connection corridor AECOM has split it into four sections (A-D) for ease of reporting. The four sections are defined in Table 2-1: Sections of the Grid Corridor. Within each section many readings are provided hence an average or in some instances a range of concentrations is given.
BESS			

ExQ1	Respondent	Question	Applicant's Response
1.13.12	Applicant	The Framework Battery Safety Management Plan (fBSMP) [APP-205]. Please explain why the Draft Guidance on Grid Scale Battery Energy Storage Systems (BESS) by the National Fire Chiefs Council (NFCC) (the 2024 document) has been applied instead of the published, and not yet revoked, Version 1.0 November 2022 guidance (the 2022 guidance).	The **Framework Battery Safety Management Plan (FBSMP) [APP-205]** applied the 2024 draft NFCC guidance in the expectation that this version would have been published before the DCO process started. The revised NFCC guidance contains greater detail on safety requirement expectations and brings greater clarity to the planning process. The FBSMP contains a greater level of minimum safety commitments through incorporating additional guidance incorporated in the 2024 draft. The FBSMP also incorporates new safety requirements that will be contained in the National Fire Protection Organisation (NFPA) 855 (2026) revision. The Applicant can confirm that the FBSMP fully addresses all guidance contained in the 2023 Version 1.0, except that 6 metres spacing between BESS is not used for the indicative site design. The Applicant emphasises that 6 metres spacing was based on a recommendation from the FM Global (2017) Property Loss Prevention Data Sheets: Electrical Energy Storage Systems Data Sheet 5-33. This was revised in 2024 and recommended 1.5m spacing for the concept design LFP system referenced in the FBSMP. It is noted that the FBSMP applies greater spacing than this, being 3m between BESS Area enclosures.

ExQ1	Respondent	Question	Applicant's Response
1.13.14	Applicant	The fBSMP [APP-205] paragraph 2.1.23 (b) says the BESS layout "allows for a separation distance of 3m between BESS enclosures and ESS equipment, and 3 m between adjacent BESS enclosures. This exceeds the NFPA 855 (2023) guidelines of 3 feet, considered safe practice by the latest NFCC guidelines if UL 9540A testing shows propagation does not occur". The 2022 guidance states that access between BESS units and unit spacing should be a minimum of 6m unless suitable design features can be introduced to reduce spacing. Please provide evidence and information to demonstrate what suitable design features have been introduced that would make the 3m separation distances acceptable. As the NFCC 2024 guidance has not been published, please confirm what alternative design options have been investigated to accommodate a 6m BESS unit spacing and whether this would result in a reduction in the 432 batteries that would be on site and if so, by how much.	Paragraphs 2.1.5, 2.1.6, 2.1.10, 2.1.23, 3.6.2 of the **Framework Battery Safety Management Plan (FBSMP) [APP-205]** document the Applicants commitment to providing a BESS system at the detailed design stage which can fully validate final equipment spacing distances from a comprehensive set of testing requirements. The Applicant emphasises that 6 metres spacing as included in the original 2023 NFCC Guidance was based on a recommendation from the FM Global (2017) Property Loss Prevention Data Sheets: Electrical Energy Storage Systems Data Sheet 5-33. That Data Sheet was revised in 2024 to recommend 1.5m spacing for the concept design LFP system referenced in the FBSMP. Paragraph 3.6.2 stipulates: "*The Scheme will select a BESS design that has undertaken full scale free burn testing to demonstrate thermal insulation protection capabilities of the BESS enclosure design, validate equipment spacing distances, and demonstrate that deflagrations do not occur and/or can be safely constrained. In accordance with NFCC guidance, the Order limits will be maintained to prevent a fire spreading to the BESS or inadvertently fire loading, by providing a 'bridge' or path between BESS enclosures to transmit flaming or radiant heat*."

ExQ1	Respondent	Question	Applicant's Response
			That commitment will ensure the final BESS Area design includes appropriate spacing as relevant to the particular thermal insulation protection capabilities of the final BESS Area design selected. This may be greater than the indicative 3m if required for safety reasons, however a number of current BESS systems have passed full scale destruction testing with spacing of 150-200mm between BESS Area enclosures. However, for the reasons outlined above the provision of a 6m spacing design was not deemed necessary for the indicative design based on the most up to date guidance and designs at this stage, as the 3m configuration will demonstrably meet or exceed relevant safety standards and ensure appropriate fire and hazard management within the development's Order limits.
1.13.18	Applicant	In response to South Yorkshire Fire and Rescue Service relevant representation [RR-009], please confirm why the distance of 10m from BESS enclosures to any planted combustible vegetation is not contained within the ODPS [APP-193].	The 10m distance from BESS enclosures is not referenced in the **South Yorkshire Fire and Rescue Service Relevant Representation [RR-009]**. However, the distance is referenced at Paragraph 2.1.23(d) of the **Framework Battery Safety Management Plan (FBSMP) [APP-205]** which has been agreed with South Yorkshire Fire and Rescue Service. As is confirmed at Paragraph 1.2.3 of the **Outline Design Parameters Statement** (Revision 01)

ExQ1	Respondent	Question	Applicant's Response
			[EN010152/APP/7.4], the design parameters of the fire safety infrastructure, mitigation and control measures are set out in the **FBSMP [APP-205]** and **ES Volume III, Framework Drainage Strategy, Appendix 9-4 [APP-160]**. Requirements 5 and 9 of the **Draft DCO [REP1-005]** require the submission and approval of both a battery safety management plan and details of the surface water drainage scheme respectively. These details must be substantially in accordance with the **FBSMP [APP-205]** and **Framework Drainage Strategy [APP-160]**. These control measures secure the design parameters of this part of the Scheme, and these are therefore not included in Table 1 of **Outline Design Parameters Statement** (Revision 01) **[EN010152/APP/7.4]**.
1.13.19	Applicant	Paragraph 3.6.5 of the fBSMP [APP-205] says that "*The emergency response plan (ERP) produced at the detailed design stage (template outlined in Paragraph 4.5.5) will incorporate all necessary emergency response procedures and actions based upon comprehensive thermal runaway test data supplied by the BESS system provider*". Section 4 pre-construction Information Requirement contains section 4.1 only. Please signpost where within the documentation or fBSMP the template ERP is as referred to in paragraph 3.6.5.	The Applicant apologises for this typographical error. The ERP template details are outlined in Pararapgh 3.5.5.
1.13.20	Applicant	Section 2.1.25 of the fBSMP [APP-205] provides details of the type of foundations that may be used.	If ground screws or piles are used and penetrate the impermeable layer of the attenuation basins within

ExQ1	Respondent	Question	Applicant's Response
		If ground screws or piles are to be used, they should not affect the impermeable nature of the attenuation basins within the BESS area to ensure any contaminated water from fire suppression is contained. Please confirm this would be the case and confirm how this would affect the fBSMP.	the BESS area, appropriate systems will be implemented to ensure a watertight seal is maintained around the foundation elements at the depth of the storage layer (typically 400–500 mm). These sealing measures will be developed and incorporated during the detailed design stage, once the final foundation solution has been confirmed. This approach will ensure the integrity of the attenuation basins is preserved and that any potentially contaminated water from fire suppression remains fully contained. As such, the **Framework Battery Safety Management Plan (FBSMP) [APP-205]** remains valid and is not affected by this consideration.
1.13.21	Applicant	Please explain why the BESS has not been located on previously developed land for example at the Thorpe Marsh substation.	Previously developed 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 and is located within Flood Zone 3. This is explained more fully in **ES Volume I Chapter 3: Alternatives and Design Evolution [APP-055].**
1.13.22	Applicant	Paragraph 2.1.16 of the fBSMP [APP-205] states that the location of the BESS has been based on a number of factors with a pertinent factor being to	As is confirmed at Pararapgh 1.2.3 of the **Outline Design Parameters Statement** (Revision 01) **[EN010152/APP/7.4]**, the design parameters of the

ExQ1	Respondent	Question	Applicant's Response
		maximise the distance to receptors where practical. There are minimum offsets then provided in subpoints a) - j). Please clarify why all of these subpoints have not been carried through into the ODPS [APP-193] under the heading 'Location' as the reference to residential property has done.	fire safety infrastructure, mitigation and control measures are set out in the **Framework Battery Safety Management Plan (BSMP) [APP-205]** and **ES Volume III, Framework Drainage Strategy, Appendix 9-4[APP-160]**. Requirements 5 and 9 of the **Draft DCO [REP1-005]** require the submission and approval of both a battery safety management plan and details of the surface water drainage scheme respectively. These details must be substantially in accordance with the **Framework BSMP [APP-205]** and **Framework Drainage Strategy [APP-160]**. These control measures secure the design parameters of this part of the Scheme, and these are therefore not included in Table 1 of **Outline Design Parameters Statement** (Revision 01) **[EN010152/APP/7.4].**
1.13.23	Applicant	Paragraph 1.4.1(h) and 2.1.10 of the fBSMP [APP-205] says if the BESS system is designed to safely burn out to remove the risk of stranded energy in the battery systems, then full scale free burn testing will have been conducted to demonstrate that loss will be safely limited to one container without the intervention of SYFR. Please confirm who will carry out the full-scale free burn testing and when this would occur in the process.	The Applicant confirms that full scale free burn testing would be conducted by the manufacturer as part of UL 9540A testing (5th Edition, 2025), or by a recognised third-party test facility specialising in full BESS destruction testing to UL 9540A protocols i.e. DNV, TUV SUD, CSA (TS-800 test program). If full scale burn testing is not conducted as part of UL 9540A testing, then it is conducted post UL 9540A testing to fully validate equipment spacing recommendations.

ExQ1	Respondent	Question	Applicant's Response
			At the detailed design stage, the Applicant will only consider BESS designs that have completed this full program of testing. This requirement aligns with the draft revisions incorporated into NFPA 855 (2026).
Electromagnetic Fields			
1.13.24	Applicant	ES Chapter 14: Other Environmental Topics [APP-066] paragraph 14.7.18 refers to the Planning Circular 01/0318: Safeguarding Aerodromes, Technical Sites and Military Explosive Storage Areas. Please confirm if this is a typo and should be Planning Circular: 01/03.	The Applicant confirms that the reference in **ES Volume I Chapter 14: Other Environmental Topics [APP-066]**, Pararapgh 14.7.18, to "Planning Circular 01/0318: Safeguarding Aerodromes, Technical Sites and Military Explosive Storage Areas" is a typographical error. The correct reference should be to Planning Circular 01/03: Safeguarding Aerodromes, Technical Sites and Military Explosive Storage Areas.
Lighting			
1.13.25	Applicant	The Planning Statement [APP-190] paragraph 4.2.27 states that lighting for the construction compounds would be covered within the fCEMP [REP1-019] with the exact detail being covered by Requirement 12. Please comment on whether this should be Requirement 11 or whether this sentence relates to another aspect.	The reference at Pararapgh 4.2.27 of the **Planning Statement [APP-246]** to Requirement 12 is an error and should be read as referring to Requirement 11.
Air Quality			
1.13.26	Applicant	ES Chapter 14: Other Environmental Topics [APP-066] paragraphs 14.2.37 – 14.2.39 covers emissions from non-road mobile machinery (NRMM) stating	The mitigation appropriate for NRMM is included in Table 3-11: Air Quality of the **fCEMP [REP1-019]**.

ExQ1	Respondent	Question	Applicant's Response
		emissions from NRMM would be controlled through best practice measures. Please explain why this aspect is not detailed within the fCEMP [REP1-019].	
1.13.27	Applicant	ES Chapter 14: Other Environmental Topics [APP-066] paragraph 14.2.58 and Table 14-4: Representative Dust Risk Receptors and Figure 14-1 Dust Risk Assessment [APP-128]. Whilst Figure 14-1 identifies dust risk assessment (DRA) receptors as small triangles around the order limit, the ExA consider it would assist the reader if Figure 14-4 could be annotated with the Receptor IDs listed in Table 14-4.	**ES Volume II Figure 14-1 Dust Risk Assessment** (Revision 01) **[EN010152/APP/6.2]** has been updated to reference the Receptor IDs and has been resubmitted at Deadline 2.
1.13.28	Applicant	The Department for Environment, Food and Rural Affairs (Defra) published interim guidance in October 2024 related to the Environment Act Particle Matter (PM2.5) targets and applies to future developments where planning applications have been submitted post 4 October 2024. The guidance emphasises the importance of implemented appropriate mitigation measures during the design stage to minimise PM2.5 emissions and exposure than assessing the likelihood of exceeding the limit value. Please clarify: a) How has exposure to PM2.5 has been considered when selecting the development site. b) What actions and/ or mitigations have been considered to reduce PM2.5 exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM2.5 and its precursors.	The Applicant has responded to each of the points in turn. a) Exposure to $PM_{2.5}$ has been considered through the application of existing air quality standards, particularly those for PM_{10} and NO_2, which inherently account for $PM_{2.5}$ due to overlapping sources and particle sizes. $PM_{2.5}$ is a subset of PM_{10}, and both pollutants are commonly both present in engine exhaust. Therefore, by ensuring that the air quality objectives for NO_2 and PM_{10} are achieved by a large margin, it can be concluded with confidence that the target values for $PM_{2.5}$ will also be achieved. This approach aligns with the understanding that achieving these broader air quality objectives will inherently protect against PM2.5-related health risks.

ExQ1	Respondent	Question	Applicant's Response
		c) if no mitigation measures have been implemented, why this was not proposed.	b) Emissions from construction activities, including those from NRMM and associated road traffic, have been assessed with respect to their contribution to PM_{10} and NO_2 levels. It has been identified that no project specific mitigation is required. c) No additional project-specific mitigation measures for $PM_{2.5}$ have been proposed because the development is expected to meet existing air quality objectives for PM_{10} and NO_2 by a substantial margin. Given the overlap in sources and the inclusion of $PM_{2.5}$ effects in the derivation of these standards, it is concluded that $PM_{2.5}$ targets will also be met. Therefore, further mitigation specific to $PM_{2.5}$ is not considered necessary under the current guidance.
1.13.29	Applicant	Given the potential for overlap of construction vehicles at Thorpe Marsh Substation and the number of proposals identified (and in some cases where planning permission has now been granted) within the cumulative impact short list (table 15-4: Short List of Other Developments ES Chapter 15: Cumulative Effects and Interactions [APP-067]), please review the approach to the availability of information for cumulative schemes. Please also consider whether the section titled 'Cumulative Effects' of section 14.2 of ES Chapter 14: Other Environmental Topics [APP-066] requires updating	The Applicant can confirm that the change in status of cumulative developments, including the granting of planning permission for application 23/00793/FULM (Thorpe Marsh), does not result in any changes to the conclusions of the cumulative assessment. Specifically, there have been no updates to the Transport and Access documentation or any revisions to the expected construction vehicle numbers. As stated in the April 2024 Transport Note, the total number of daily HGV movements associated with the Proposed Development remains at 18 in and 18 out per day.

ExQ1	Respondent	Question	Applicant's Response
		particularly given planning application 23/00793/FULM has been granted planning permission.	Given that the Thorpe Marsh development was already included in the cumulative assessment presented in Section 14.2 ('Cumulative Effects') of **ES Volume I Chapter 14: Other Environmental Topics [APP-066]**, and that no new or increased traffic generation has been identified for either scheme, the cumulative assessment remains valid, and its conclusions are unchanged.
14.	**Compulsory Acquisition and related matters**		
1.14.1	Applicant	There are a number of plots identified in the Book of Reference (BoR) [REP1-009] for which the owners are not known. Please provide an update on efforts to establish these owners/interests and details on what further steps will be undertaken to identify these owners prior to the exercise of CA powers.	The Applicant erected site notices at every milestone within the project: Initially in February 2024 during the land referencing for Statutory Consultation, again alongside Section 48 Notification in April 2024 during Statutory Consultation, and then again alongside Section 56 Notification after acceptance for examination in December 2024.
1.14.2	Applicant	Annex C of the CA Guidance indicates (at paragraph 4) that where it is necessary for the Land Plan to have more than one sheet, appropriate references must be made to each of them in the text of the draft order so that there is no doubt that they are all related to the order. Please signpost where these can be found or include appropriate references in subsequent versions of the dDCO.	The Applicant notes that the definition for the land plans within the draft DCO at Article 2 refers to these as being "plans" (plural). The definition also cross references to the Land Plans as captured within Schedule 12 of the Order, which further defines these as being the document EN010152/APP/2.1 and APP-006. The Applicant considers this is sufficiently clear that the entire document (ie all of the plans) captured within that reference are what is being referred to within the Order.

ExQ1	Respondent	Question	Applicant's Response
			It is further noted that where plots on specific sheets are being referred to within the draft DCO, the exact sheet and plot within the Land Plans are referred to. For example, Schedules 9 and 10 distinguish different plots within the sheets within the Land Plans for the rights and covenants to be applied under the Order. This is the same referencing/definition approach which has been applied in all recently made solar DCOs, including the East Yorkshire Solar Farm Order 2025, the West Burton Solar Project Order 2025, the Cottam Solar Project Order 2024, the Mallard Pass Solar Farm Order 2024 and the Gate Burton Energy Park Order 2024.
1.14.3	Applicant	The ExA notes the concerns raised by Able UK Limited and Elba Securities Limited [AS-003 and REP1-057] in relation to its land interests and in particular the proposed CA powers in relation to plot 10/05. Please can the applicant explain the need for CA powers over this plot, what rights are being sought and how it proposes to ensure that existing infrastructure is protected.	<u>Need for CA Powers over Able land</u> The Applicant has noted the concerns raised by Able UK Ltd and Elba Securities Ltd (referred to collectively as Able from here on in), and has been engaging with Able since ISH1 to progress a voluntary property agreement between the parties, such that the Applicant would not need to rely on compulsory purchase powers. The Applicant also refers to the **Applicant's Response to Relevant Representations [REP1-031]** at pgs 122 – 123 as to the justifications for CA powers for Able's land. However, in lieu of such an agreement being in place, the Applicant considers CA powers remain

ExQ1	Respondent	Question	Applicant's Response
			necessary. The Applicant also notes the discussion in paragraph 5.1.3 of the **Statement of Reasons [APP-018]** as to why compulsory purchase powers are still required to protect the project even once voluntary agreements are in place, in the unlikely scenario such an agreement cannot complete. The Applicant notes (as is outlined in further detail in the Statement of Reasons) that Section 122 of the PA 2008 provides that a DCO may only include provisions authorising the compulsory acquisition of land if the SoS is satisfied that the land is: a. required for the development to which that DCO relates; b. required to facilitate or is incidental to that development; or c. replacement land for commons, open spaces, etc. In respect of Able's land, including Plot 10/05, the Applicant considers it is clearly required for the authorised development (ie point a.). In addition to the justification already provided in the **Applicant's Response to Relevant Representations [REP1-031]** at pgs 122 – 123, the Applicant further notes: • Able owns the underlying title to the National Grid Thorpe Marsh Substation, to which the Scheme is connecting to the Grid. (Plot 10/06). There is no feasible manner in which the Scheme can therefore avoid some

ExQ1	Respondent	Question	Applicant's Response
			property rights being required in respect of Able's land. • Plot 10/05 is the Order limits immediately adjacent to the National Grid Thorpe Marsh Substation site, and directly in between the main Solar site and the Substation. It therefore reflects the most efficient route from the Main Site to the National Grid Thorpe Marsh Substation. • While the Applicant will endeavour to minimise impacts on Able's land in the final detailed design for the Cable Route, and use the public highway (Plot 9/09) for the laying of cables where practical, it is the Applicant's understanding based on property enquires and initial surveys that there is significant existing cabling within the highway at Plot 09/09. This means there is unlikely to be sufficient space within the highway to locate the cabling required for the Scheme. • At this stage, the Applicant still relies on final confirmation by National Grid as to the exact location within the Substation that National Grid will provide connection bays for the Scheme. National Grid has indicated this cannot be confirmed until post-consent, at the time of detailed design. The Applicant therefore must retain sufficient land to direct its cables around the National Grid Thorpe Marsh Substation to the final location of the

ExQ1	Respondent	Question	Applicant's Response

connection bays. This again, relies on the use of Plot 10/05 to circumnavigate the National Grid site to the north.

The Applicant further notes the SoS must be satisfied there is a compelling case in the public interest for the land to be acquired compulsorily. This case is set out within the **Statement of Reasons [APP-018]** for the project as a whole. Given Able's land is directly required for the delivery of the cable route and connection, it is considered that case squarely applies to its land.

Rights being sought over Able's land

As set out within Schedule 9 of the **draft DCO** (Revision 03) **[EN010152/APP/3.1],** the Applicant is seeking cable rights (as defined in that schedule and subject to the powers of Article 22 of the Order) over Able's land, including Plot 10/05. This is to provide for the grid connection from the Solar PV Site through Able's land and into the National Grid Thorpe Marsh Substation connection bay.

Proposal for the protection of existing infrastructure

As outlined in the **Applicant's Response to Relevant Representations [REP1-031]** at pgs 121 – 123, in discussions with Able to date, Able has not provided any detail as to the location or nature of existing infrastructure held by Able within their land (noting of course, the Applicant is aware of existing

ExQ1	Respondent	Question	Applicant's Response
			infrastructure on Able's land relating to third parties such as National Grid). Able has not raised details about existing infrastructure in the discussions held since ISH1. The Applicant is not aware of any existing infrastructure from surveys or property searches. As such, at this stage the Applicant does not understand there is any existing infrastructure held by Able for the Scheme to protect. However, the Applicant remains open and engaged in ongoing discussions with Able, and would be happy to consider such protections, should Able provide any information about existing infrastructure it requires protections for.
1.14.4	Applicant	Paragraphs 1.3.3 and 4.1.4 of the Statement of Reasons (SoR) [APP-018] explains that a grid connection line drop is being explored as an alternative to the proposed grid connection corridor and will be determined by National Grid post any grant of development consent. The ExA notes that, if viable, this would result in a considerable reduction in the amount of land subject to CA powers (around 98ha). Please can the applicant explain why this option is only to be determined after any grant of development consent and how this accords with paragraph 8 of the CA guidance which indicates that the applicant should be able to demonstrate that all	The response to this question, alongside other ExQ1s about the line drop option, is set out in in **Appendix A.**

ExQ1	Respondent	Question	Applicant's Response
		reasonable alternatives to CA, (including modifications to the scheme) have been explored.	
1.14.5	Applicant	The SoR [APP-018] contains various references to the applicant's 'Outline Design Principles' document. Please confirm that the document being referred to is the ODPS [APP-193].	The Applicant can confirm that those references in the Statement of Reasons are to the **ODPS [APP-193]**.
1.14.7	Applicant	Part 2 of the BoR [REP1-009] lists 'Category 3' persons. The applicant is asked to: a) provide further detail/justification of how you have identified Category 3 persons for the purposes of the BoR; c) clarify if there are any persons who might be entitled to make a relevant claim if the DCO were to be made and fully implemented, and who should therefore be added to the BoR as a Category 3 person.	The Applicant has not identified any category 3 interests. After carrying out diligent inquiries and having carefully assessed the likely significant environmental effects of the Scheme, it is not considered that any person would be entitled to make a claim under Part 1 of the Land Compensation Act 1973. Part 2 of the **Book of Reference [REP1-009]** therefore includes all relevant interests with the potential to make a claim under section 10 of the Compulsory Purchase Act 1965 or under section 152(3) of the PA 2008, by reason of having the benefit of a right or restrictive covenant over land within the Order limits that may be affected by the compulsory acquisition and temporary use powers sought by the Applicant.(1.9 (b), **Book of Reference [REP1-009]**) This decision was based on any party that may be eligible to make a claim for compensation as a result of the construction or operation of the Scheme (8.2.1, 4.1 **Statement of Reasons [APP-018]**).
1.14.8	Applicant	The ExA notes the comments contained in [REP1-063] in relation to the impact of the proposed	The Applicant notes the comments in [REP1-063]. The property referred to is a subsoil interest in plot

ExQ1	Respondent	Question	Applicant's Response
		development on the ability to access this affected person's property. Please explain whether, and if so how, the proposed development would affect access to that property.	6/03 (highway). The Applicant confirms that works in this area are limited to street and highways works as detailed in Sheet 6 of the **Streets, Rights of Way and Access Plans** (Revision 03) **[EN010152/APP/2.3]**. The Applicant confirms that access to the affected person's property will be maintained at all times.
1.14.10	Applicant	The ExA notes that the Land Rights Tracker [REP1-043] indicates that the applicant is in negotiations with the owners of plot nos. 6/06, 6/07, 6/08, 8/06, 8/12, 8/14, 8/15, 8/16, 9/01 and that negotiations are in the final states. Does the applicant anticipate concluding those negotiations before the close of the examination?	The Applicant has updated the **Land Rights Tracker** (Revision 01) **[EN010152/APP/8.15]** at Deadline 2 and anticipates that voluntary agreements with these landowners will be reached by the end of examination.
1.14.11	Applicant	The ExA notes that heads of terms were signed for plot nos. 7/03 and 7/04 in September 2024. Please explain why no further progress with formal agreements has been made since this time.	The Applicant remains in close contact with the landowner and is responding to their solicitor's questions as they arise. The Applicant anticipates that the option for a cable easement and the option for the temporary construction compound will be complete before the end of examination.
1.14.12	Applicant	For plot nos 9/02 and 9/04, please provide details of attempts to contact the landowner.	The Applicant has recently received a response to its communications from the landowner of plots 9/02 and 9/04 and is in the process of arranging a meeting. The Applicant has updated the Land Rights Tracker at Deadline 2 to include this information (Revision 01) [**EN010152/APP/8.15]**.

ExQ1	Respondent	Question	Applicant's Response
1.14.13	Applicant	Please provide a copy of the letter from BT referred to in the Land Rights Tracker [REP1-043] which confirms it supports the use of standard protective provisions for the protection of operators of communications code networks.	A copy of the letter from Openreach (whom are responsible for the assets of BT) is provided as Appendix B to this document.

Appendix A Responses to ExQ1 On Line drop

Appendix A – Responses to ExQ1s on Line Drop

The Applicant has prepared the below response to the multiple ExQ1s raised about the feasibility of the line drop option for the Scheme's grid connection ("the Line Drop"), and any subsequent impacts on the compulsory acquisition case for the Scheme and the Grid Connection Corridor, specifically ExQ1.1.15, 1.2.1 and 1.14.4.

Engagement with, and decision by, National Grid

As outlined in **ES Volume 1 Chapter 3 – Alternatives and Design Evolution [APP-055]** the Applicant commenced early discussions with National Grid in 2021, to secure a grid connection in the Yorkshire area, having been aware of the region's legacy of coal fired power stations. Availability at the National Grid Thorpe Marsh Substation was informally indicated as available by National Grid. Based on this availability, the Applicant undertook a search for appropriate land within the surrounding area for Solar PV and BESS technology.

As part of this search, the Applicant identified the (now) Solar PV Site, and noted as part of initial assessments the existing 400kV overhead lines running through the Solar PV Site. Initial discussions were held with National Grid as to the possibility of providing a connection onsite from those existing cables. Following the outcome of these discussions, on 13/10/2021 the Applicant formally applied to National Grid for a grid connection onsite via a "line drop" indicating several potential towers within the Solar PV Site.

The Applicant subsequently received a formal offer from National Grid for an import and export capacity for the requested amount of 237.5MW on 27th May 2022, however, despite the preliminary discussions, the offer provided a point of connection at the National Grid Thorpe Marsh 400kV substation.

It's important to clarify here that the offer received and accepted secures a capacity in the network to facilitate a connection on the connection date, currently at National Grid Thorpe Marsh Substation. Full optioneering of the design and technical work will only be carried out closer to the connection date. National Grid have informed the Applicant that they are unable to provide the extensive detailed work required to finalise the connection location and design with their current workload for a project with:

a) a current connection date of April 2032; and
b) which is currently without planning permission.

National Grid have confirmed planning permission is a milestone the Scheme must meet before it can commence any further detailed discussions on the connection design.

Subsequent discussions with National Grid have confirmed that from an engineering and technical perspective, the Line Drop is a possible option, but their economic policy states that they must always offer the most economic connection possible. Those discussions confirmed that they consider the connection at Thorpe Marsh Substation via an underground cable remains the most economic solution at this time, but this is yet to be fully accurately costed during the optioneering process. The

substation at Thorpe Marsh itself is going through a complete redesign which will not be completed until late 2025.

The connection date the Scheme currently holds is driving National Grids priority in looking into the optioneering for this connection at this stage. If the project is granted its Development Consent Order and subject to the current connections reform program concluding, this may allow for the connection date to be brought forwards via a Modified Application and for the design and optioneering process to commence earlier.

Commitments by Applicant

The Applicant remains committed to ensuring the option of the Line Drop vs cabling is considered and explored fully through the optioneering process. As outlined above, once consent is obtained for the Scheme, the Applicant will advocate to National Grid for that optioneering process.

The Applicant can confirm that the reference to cumulative effects between the connection of the Grid Connection Line Drop and cable laying in the Grid Connection Corridor at paragraph 14.7.37 of the **ES Chapter 14: Other Environmental Topics [APP-066]** is an error, and the references throughout the rest of the ES as well as in the Planning Statement to only one of the two options being pursued is the only approach the Applicant would pursue.

The Applicant however does not consider it appropriate for the draft DCO to include provisions which prescribe the Line Drop must be pursued, if considered viable. The Applicant notes again that the viability decision referred to throughout the Application is the decision by National Grid as to whether to accept a Line Drop in a Modified Application for the Scheme's grid connection. Given that assessment and decision will be made by National Grid, the Applicant does not have sufficient information at this time as to what its scope and outcome will be. This includes any design or commercial requirements National Grid would require of the Applicant, and whether these would be physically or financially feasible for the Scheme.

Compliance with compulsory acquisition guidance

The Applicant further notes the question in ExQ1.14.4 as to whether inability of the Scheme to commit to the Line Drop conflicts with paragraph 8 of the CA Guidance which indicates that the applicant should be able to demonstrate that all reasonable alternatives to CA, (including modifications to the scheme) have been explored. The ExA has queried whether leaving the option's determination to after the grant of a DCO accords with this Guidance.

As outlined above, while the Applicant has assessed, and considers the Line Drop to be viable in respect of the Scheme's design and operation, the ultimate decision on whether the Line Drop is viable from the perspective of the national grid, lies with National Grid to make. Currently, the only formal commitment made by National Grid in respect of a grid connection is for the grid connection at Thorpe Marsh Substation. If the Applicant was to remove the existing Grid Connection Corridor from the scope

of the authorised development at this stage, it would therefore not be able to guarantee that the Scheme as a whole would be viable.

Until final confirmation is provided by National Grid that it will accept a Modified Application to utilise the Line Drop, the Applicant does not consider the Line Drop could be considered a “reasonable alternative” to compulsory acquisition for the purposes of paragraph 8 of the CA Guidance. As noted above, as National Grid has indicated it will not commence the formal optioneering process for the Line Drop until after the Scheme has obtained development consent, the Applicant therefore must retain the Grid Connection Corridor as part of the authorised development.

The Applicant does note that it intends to continue to follow the CA Guidance and the further guidance set out in the ODPM circular 06/2004 *Compulsory Purchase and the Crichel Down Rules*, such that in the first instance the Applicant has sought to acquire land through negotiation and will continue to do so, treating compulsory purchase as a last resort only.

Appendix B Response to ExQ1.14.13 – Openreach letter

openreach

FAO: [redacted]
PINSENT MASONS LLP
30,
Earl Street,
Crown Place,
London,
EC2A 4ES
Date: 18/12/24

Our ref: 930700/BNNR12/IC/24

Your ref: N/A

REF: Fenwick Solar Project DCO Application (IPM-AC. FID5527424)

Thank you for your recent correspondence,
Openreach Limited are appointed by British Telecommunications Limited to manage the protection of their electronic communications apparatus.
We understand from the information provided that you are planning to install infrastructure relating to the Fenwick Solar Project under, or in close proximity to, elements of the British Telecommunications electronic communications apparatus (the "BT Apparatus").

We acknowledge that you are in the process of obtaining the relevant statutory consents for the DCO Application. As part of this process, assurances are required from us that we approve in principle to the Fenwick Solar Project infrastructure being laid under, or in close proximity to, the BT Apparatus. Such consent in principal is hereby given.

We further acknowledge that you have engaged with us in respect of the Fenwick Solar Project DCO during the formal consultation carried out pursuant to the Planning Act 2008 including (but not limited to) consulting with us as to terms of the draft Development Consent Order (DCO) application for the Fenwick Solar Project.

We consent in principal that the protective provisions set out in the document titled "FOR THE PROTECTION OF OPERATORS OF ELECTRONIC COMMUNICATIONS CODE" (attached) of your draft DCO provide adequate protections for our interests and that on that basis we do not intend to take part in the examination process for your proposed DCO for the Fenwick Solar Project

With Regards,

[redacted]
Repayments Project Engineer
Repayments (Alterations)
PP BLDG Eldon House
Charter Row
S1 3EF

Registered Office:
81 Newgate Street,
London EC1A 7AJ
Registered in England and Wales no. 1800000

www.openreach.co.uk