Fosse Green Energy

Fosse Green Energy

EN010154

9.9 Applicant's Response to Written Representations

VOLUME

9

Planning Act 2008 (as amended)

Regulation 8(1)(k)

Infrastructure Planning (Examination Procedure) Rules 2010

18 July 2025

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2010

Fosse Green Energy

Development Consent Order 202[ ]

9.8 Applicant's Response to Written Representations

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1. Introduction

1.1 Purpose of this document

1.1.1 The purpose of this document is to provide Fosse Green Energy Limited's ('the Applicant') response to the Written Representations submitted by Interested Parties (IPs) at Deadline 1 of the Examination in relation to Fosse Green Energy (the Proposed Development).

1.1.2 The Development Consent Order (DCO) application ('the Application') for the Proposed Development was submitted on 18 July 2025 and accepted for Examination on 15 August 2025. Deadline 1 was on the 20 January 2026.

1.1.3 A total of 136 Written Submissions were submitted to the Examination at Deadline 1. Fifty five of these were from the Applicant, with 81 being from IP's. Fifty six of the submissions from IPs were Written Representations.

1.1.4 The Applicant considers that a number of Deadline 1 submissions which were submitted as "post hearing summaries" are more akin to Written Representations. Therefore, the 15 post hearing summaries which the Applicant considers to be Written Representations have been responded to as such and are therefore contained within this document, rather than within the Applicant's Response to Post Hearing Summaries **[EN010154/EXAM/9.11]**. The IPs that submitted post hearing summaries which the Applicant has responded to as Written Representations and the respective Examination Library references are:

a. Coleby Parish Council **[REP1-059]**;
b. Cliff Villages Solar Action Group **[REP1-080]**;
c. Robert Brewer **[REP1-092]**;
d. Theresa Brewer **[REP1-093]**;
e. Michael Campbell **[REP1-096]**;
f. Isobel Formoy **[REP1-103]**;
g. James Gallagher **[REP1-104]**;
h. Alistair King **[REP1-112]**;
i. Carl Anton John Koenen **[REP1-115]**;
j. Anthony Paul Magri **[REP1-117]**;
k. Susan Makinson-Sanders **[REP1-119]**;
l. Joanne Mawditt **[REP1-121]**;
m. Charles Peter Overton **[REP1-125]**;
n. Allyson Julie Sorrell **[REP1-131]**; and
o. Martin Robert Sorrell **[REP1-132]**.

1.1.5 The Applicant considers that Deadline 1 submissions from Cliff Villages Solar Action Group **[REP1-079]** and Katina Johnson **[REP1-110]** which were submitted as "Deadline 1 Submission" and "Comments on Local Impact Report", respectively, were also more akin to Written Representations. Therefore, these submissions which the Applicant considers to be Written Representations have been responded to as such and are therefore contained within this document, rather than within the Applicant's Response to Post Hearing Summaries **[EN010154/EXAM/9.11]**.

1.1.6 To avoid repetition, the Applicant has only provided a full response to comments that make points that have not been addressed previously within the Applicant's Responses to Relevant Representations **[REP1-047]** or where the Applicant considers that a full response and/or further clarification may be useful.

1.1.7 In response to matters that were raised previously in Relevant Representations or at the first hearings for the Examination, the Applicant has provided a reference to where these have previously been responded to in the Applicant's Response to Relevant Representations **[REP1-047]**, the Written Summaries of Oral Submissions at Issue Specific Hearing 1 **[REP1-046]**, the Written Summaries of Oral Submissions at Issue Specific Hearing 2 **[REP1-044]** or the Written Summaries of Oral Submissions at Compulsory Acquisition Hearing 1 **[REP1-045]**.

1.2 Structure of this document

1.2.1 This document provides a response from the Applicant to Written Representations received at Deadline 1, and is structured as follows:

a. **Section 2: Statutory Consultees:** the Applicant's responses to Written Submissions from Statutory Consultees.

b. **Section 3: Non-Statutory Organisations:** the Applicant's responses to Written Submissions from Non-Statutory Organisations.

c. **Section 4: Local Authorities:** the Applicant's responses to Written Representations from Local Authorities.

d. **Section 5: Parish Councils:** the Applicant's responses to Written Representations from Local Authorities.

e. **Section 6: Members of the Public**: the Applicant's responses to Written Representations Members of the Public.

f. **Section 7: Persons with an Interest in the Land**: the Applicant's responses to Written Representations from Persons with an Interest in the Land.

1.2.2 The documents submitted with the Application are also referenced in this document, using the reference number given in the Examining Authority Examination Library (e.g. **[APP-XXX]**, or **[AS-XXX]**) where a document which has previously been submitted is referenced, or the Applicant's reference number (e.g. **[EN010154/APP/XX(RevX)]**) where a new document is being

submitted at Deadline 2. All documents are also presented in numerical order in the Guide to the Application **[EN010154/APP/1.3(Rev3)]**

1.2.3 **Table 1-1** provides a list of Interested Parties that submitted Written Representations at Deadline 1 and indicates the location of the response within this document.

Table 1-1 List of Interested Parties that submitted Written Representations at Deadline 1 and Location of Response

Reference number	Consultee	Location of Response
Statutory Consultees		
REP1-070	Defence Infrastructure Organisation	Section 2.1
REP1-071	Environment Agency	Section 2.2
REP1-072	CMS Cameron McKenna Nabarro Olswang LLP on behalf of National Grid Electricity Transmission plc	Section 0
REP1-074	National Highways	Section 2.4
REP1-077	Natural England	Section 2.5
REP1-078	Network Rail Infrastructure Limited	Section 2.6
Non- Statutory Consultees		
REP1-079	Cliff Villages Solar Action Group	Section 3.1
REP1-080	Cliff Villages Solar Action Group	Section 3.1
REP1-082	Cliff Villages Solar Action Group	Section 3.1
REP1-084	Lincolnshire Against Needless Destruction	Section 3.2
REP1-087	BPA/PRAX	Section 3.3
REP1-089	Springwell Solar Action Group	Section 3.4
Local Authorities		
REP1-057	North Kesteven District Council	Section 4.1
REP1-055	Lincolnshire County Council	Section 4.2
Parish Councils		
REP1-059	Coleby Parish Council	Section 5.1
REP1-061	Harmston Parish Council	Section 5.2
REP1-062	Norton Disney Parish Council	Section 5.3
REP1-064	Scopwick and Kirkby Parish Council	Section 5.4
REP1-066	Thorpe on the Hill Parish Council	Section 5.5
REP1-067	Swinderby Parish Council	Section 5.6
REP1-068	Wellingore Parish Council	Section 5.7
REP1-069	Thurlby Parish Meeting	Section 5.8
Members of the Public		

Reference number	Consultee	Location of Response
REP1-091	Ruth Abrahams	Section 6
REP1-092	Robert Brewer	Section 6
REP1-093	Theresa Brewer	Section 6
REP1-095	Kathryn Campbell	Section 6
REP1-096	Michael Campbell	Section 6
REP1-099	Andrew Cronin	Section 6
REP1-100	Lisa Cronin	Section 6
REP1-102	Thomas Brian Fenn	Section 6
REP1-103	Isobel Formoy	Section 6
REP1-104	James Gallagher	Section 6
REP1-105	Paul Hathaway	Section 6
REP1-106	Anne Heard	Section 6
REP1-108	Philip John Heard	Section 6
REP1-110	Katina Johnson	Section 6
REP1-111	Andrew Keeling	Section 6
REP1-1-117	Anthony Paul Magri	Section 6
REP1-112	Alistair King	Section 6
REP1-113	Gordon Kobish	Section 6
REP1-114	Sue Kobish	Section 6
REP1-115	Carl Anton John Koenen	Section 6
REP1-119	Susan Makinson Sanders	Section 6
REP1-120	Joanne Mawditt	Section 6
REP1-122	John Morris	Section 6
REP1-124	Councillor Marianne Overton	Section 6
REP1-125	Charles Peter Overton	Section 6
REP1-126	Mrs Diane Plumb	Section 6
REP1-127	Helen Nunziatina Joan Powell	Section 6
REP1-128	Malcolm Robert Ramsay	Section 6
REP1-129	Malcolm Robert Ramsay	Section 6
REP1-130	Barry Smith	Section 6
REP1-131	Allyson Julie Sorrell	Section 6
REP1-132	Martin Robert Sorrell	Section 6
REP1-134	Marc Williams	Section 6
REP1-135	Mark Wheater	Section 6
Persons with an Interest in the Land		
REP1-101	Luke Daniels	Section 7

Reference number	Consultee	Location of Response

1.2.4 For ease of reference, a table of acronyms used in this document is provided in Table 1-2 and this document.

Table 1-2 Abbreviations

Abbreviation	Definition
AA	Appropriate Assessment
AGLV	Area of Outstanding Natural Beauty and Areas of Great Landscape Value
AIA	Arboricultural Impact Assessment
AIL	Abnormal Indivisible Loads
ALC	Agricultural Land Classification
BMV	Best and Most Versatile Land
BNG	Biodiversity Net Gain
BPM	Best Practicable Means
CCTV	Closed Circuit Television
CEMP	Construction Environmental Management Plan
CTMP	Construction Traffic Management Plan
DAS	Design and Access Statement
DBA	Desk Based Assessment
DCO	Development Consent Order
DEMP	Decommissioning Environmental Management Plan
EA	Environment Agency
EIA	Environmental Impact Assessment
EMF	Electro Magnetic Fields
ES	Environmental Statement
ESSCP	Employment, Skills and Supply Chain Plan
FRA	Flood Risk Assessment
GW	Gigawatt
ha	Hectares
HA	Host Authority
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
HRA	Habitats Regulation Assessment
IDB	Independent Drainage Board
IPs	Interested Parties
LCC	Lincolnshire County Council
LEMP	Landscape and Ecological Management Plan

Abbreviation	Definition
LHA	Local Highway Authority
LIR	Local Impact Report
LOAEL	Lowest Observed Adverse Effect Level
LVIA	Landscape and Visual Impact Assessment
LWS	Local Wildlife Site
MSA	Minerals Safeguarding Areas
MW	Megawatt
NGET	National Grid Electricity Transmission plc
NKDC	North Kesteven District Council
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
OEMP	Operational Environmental Management Plan
PA 2008	Planning Act 2008
PEI	Preliminary Environmental Information
PINS	Planning Inspectorate
PROW	Public Right of Way
PV	Photovoltaic
RR	Relevant Representation
SAC	Special Area of Conservation
SMP	Soil Management Plan
SoCG	Statement of Common Ground
SoS	Secretary of State
SPA	Special Protection Area
SRN	Strategic Road Network
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TCPA 1990	Town and Country Planning Act 1990

2. Applicant's Response to Written Representations at Deadline 1 – Statutory Consultees

2.1 Defence Infrastructure Organisation on behalf of the Ministry of Defence [REP1-070]

Table 2-1: Applicant's Responses to Written Representation at Deadline 1 – Defence Infrastructure Organisation on behalf of the Ministry of Defence

Ref. No.	Theme	Defence Infrastructure Organisation (on behalf of Ministry of Defence) Written Representation / Summary of Written Representation	Applicants Response to Defence Infrastructure Organisation (on behalf of Ministry of Defence) Written Representation
REP1-070	Glint and Glare	The MOD accepts there will be no impact on military aircraft caused by glint and glare from the proposed development. The MOD has confirmed that it has no objections to this application. As requested in the Procedural Decision Letter dated 21st November 2025, the MOD and the applicant Fosse Green Energy Ltd have worked on a Statement of Common Ground (SoCG) together. An agreement has been reached on the matter of Glint and Glare.	The Applicant notes this comment and will continue to engage with the Ministry of Defence (MOD) through the Statement of Common Ground (SoCG) between the Applicant and the MOD to be submitted at Deadline 3A of the Examination (24 March 2026) in line with the Examination Timetable set out at Annex A to the Rule 8 Letter **[PD-010]**.
REP1-070	MoD Safeguarding	The MOD recognises that cranes, tall plant equipment, or other tall temporal structures may be required during the implementation of development on any part at this site. The deployment of such equipment could impact upon the safe and effective operation of RAF Waddington and RAF Cranwell. The MOD therefore has informed the applicant that we require prior notification if tall construction equipment such as cranes is to be used during the construction or decommissioning phases of the proposed development. This has been captured within the SoCG and is under discussion with the applicant. In summary, the MOD has no safeguarding objections to this proposed development. This is on the basis that the MOD is given prior notification of the use of tall construction equipment such as cranes.	The Applicant notes this comment and acknowledges the MOD's request for prior notification if tall construction equipment such as cranes is to be used during the construction or decommissioning phases of the Proposed Development. As such, the Framework Construction Environmental Management Plan (CEMP) **[REP1-032]** and Framework Decommissioning Environmental Management Plan (DEMP) **[REP1-035]** have been updated to include the following wording: *"The CAA, MoD and aerodromes whose perimeters are within 10 Nautical Miles (NM) (18.5 km) of the crane will be given at least eight weeks (40 working days) notice before the erection of any cranes onsite for long term planned works, and a minimum 5 working days' notice for ad hoc or unforeseen works requiring cranes."* The updated documents including this wording will be submitted at the next available Examination deadline This position will also be confirmed in the SoCG between the Applicant and the MOD to be submitted at Deadline 3A of the Examination as noted above. The Framework Operational Environmental Management Plan has not been updated. Tall temporal structures such as cranes will not be required for routine maintenance or repowering of the Proposed Development.

2.2 Environment Agency [REP1-071]

2.2.1 In the Environment Agency's (EA) Written Representation **[REP1-071]**, the EA note that they have no further issues to add to those raised in their Relevant Representations (RR-089). As such, their Written Representation comprised an update on progress made with the Applicant in resolving their Relevant Representation Issues. The Environment Agency noted that the Applicant has satisfactorily engaged with them in relation to the RR issues raised, through the first draft Statement of Common Ground (SoCG) and separately on matters relating to the disapplication of the requirement for Flood Risk Activity Permits (FRAPs) and other draft Development Consent Order (**Draft DCO**) matters, as well as the Water Resource Assessment. Therefore, only the issues marked as 'Under Discussion' in the Environment Agency's Written Representation (Appendix 1) **[REP1-071]** are presented in Table 2-2 below and responded to.

Table 2-2: Applicant's Responses to Written Submissions at Deadline 1 – Environment Agency

Ref. No.	Theme	Environment Agency's Written Representation / Summary of Written Representation	Environment Agency's Applicants Response to Written Representation
REP1-071	Draft DCO	**RR ID EA05: Disapplication of Water Resources Act 1991** - The Applicant has not yet provided a response to us on the Disapplication of Water Resources Act 1991, but they have mentioned it is still under consideration. This was acknowledged by the Applicant's representatives in Issue Specific Hearing (ISH) 2 on 8 January 2026. However, given that the Applicant has stated that the disapplication of the requirement for FRAPs is no longer being pursued and that Article 6(1)(e) is being removed from the dDCO, we request that Article 6(1)(d) is now be removed. This because we do not agree to disapply the Water Resources Act 1991 in relation to byelaws without also agreeing to disapply the requirement for FRAPs and therefore the inclusion in the dDCO of our protective provisions.	Article 6(1)(d) of the Draft DCO **[REP1-007]** disapplies the provisions of any byelaws made under, or having effect as if made under, paragraphs 5, 6 or 6A of Schedule 25 to the Water Resources Act 1991. The provisions of Schedule 25 of the Water Resources Act 1991 give the appropriate agency the power to make numerous byelaws in relation to a number of different purposes, for example the efficient working of a drainage system, regulating the effects on the environment of a drainage system and the conservation of flora or fauna which are dependent on an aquatic environment etc. These byelaws can potentially be numerous and hard to identify as far as they relate to any development to be undertaken. As such, in order to ensure the efficient delivery of nationally significant infrastructure projects (NSIP), such as the Proposed Development, the Planning Act 2008 allows for such byelaws to be disapplied wholesale under a DCO given that the purposes to which these byelaws may relate are matters whose merits and acceptability can, and will, already have been sufficiently considered and resolved if the **Draft DCO [REP1-007]** is made. The Applicant therefore considers this disapplication both appropriate and necessary. The Applicant is of the view that if the Environment Agency considers that there are any byelaws the purposes of which are not already sufficiently considered and resolved as part of the assessment of the Proposed Development and the mitigation and management measures provided for, then they should identify those byelaws so that they can be considered by the Applicant, given that the Applicant's approach is consistent with that provided for under the Planning Act 2008 and adopted across numerous NSIP applications.
REP1-071	Flood Risk	**RR ID EA07: Witham Washlands (Lincoln) Flood Storage Area** – HDD construction compound - the Applicant has provided a response to this issue in the first draft SOCG. We are still reviewing the response internally at this time and will respond to the Applicant at the earliest opportunity. We will provide an update to the Examining Authority (ExA) at the next relevant deadline	The Applicant acknowledges this comment and will continue to engage with the EA regarding the Witham Washlands Flood Storage Area.
REP1-071	Fisheries	**RR ID EA08: Flow direction of main rivers** - The Applicant has not yet responded to us on this issue and has not been included in the first draft SOCG. We assume this to be an oversight. We also note there is a question in the ExA's First Written Questions (ExQ1) on this matter (question ENC.1.06)	The Applicant has responded to comments relating to RR ID EA08 in Table 2-1, Section 8 on Page 26 of the Applicant's Response to Relevant Representations **[REP1-047]** as follows: It is acknowledged that the direction of flow of the River Witham and River Brant in Table 8-10 is incorrectly stated – this has been corrected within Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]** for clarity and the updated chapter was submitted to the Examination at Deadline 1. However, as noted in the Applicant's Response to Relevant Representations **[REP1-047]**, the assessment presented within Chapter 8: Ecology and Nature Conservation

Ref. No.	Theme	Environment Agency's Written Representation / Summary of Written Representation	Environment Agency's Applicants Response to Written Representation
			of the ES **[REP1-019]**, including the relevant appendix on fish; Appendix 8-C Aquatic Ecology of the ES **[AS-081]**, has considered both upstream and downstream impacts and all references to locations of desk study data, designated sites and protected species (including fish) either upstream or downstream are correct. Therefore, it can be confirmed that the aquatic ecology baseline assessment presented in the ES is accurate. This has also been clarified in the Applicant's Response to the Examining Authority's First Written Questions **[EN010154/EXAM/9.8]**, in response to question ENC.1.06.
REP1-071	Groundwater and contaminated land	**RR ID EA11: Stopping works where potentially contaminated land is encountered** - With regards to stopping works where potentially contaminated land is encountered - The Applicant has responded to us on this issue in the first draft SOCG. However, we are not currently satisfied with the Applicant's response. We will continue to engage with the Applicant to resolve the issue and provide an update to the ExA at the next relevant deadline.	The Applicant notes this comment and will continue to engage with the EA to resolve this matter. The Applicant will continue to engage with the EA through the Statement of Common Ground (SoCG) between the Applicant and the EA to be submitted at Deadline 3A of the Examination (24 March 2026) in line with the Examination Timetable set out at Annex A to the Rule 8 Letter **[PD-010]**.
REP1-071	Groundwater and contaminated land	**RR ID EA12: Assessment of impacts on groundwater quality** - the Applicant has responded to us on this issue in the first draft SOCG. However, we are not currently satisfied with the Applicant's response. We will continue to engage with the Applicant to resolve the issue and provide an update to the ExA at the next relevant deadline.	The Applicant notes this comment and will continue to engage with the EA through the SoCG between the Applicant and the EA to be submitted at Deadline 3A of the Examination as noted above.
REP1-071	Surface water quality; groundwater and contaminated land	**RR ID EA16 - BESS penstock valves and swales** - No direct response received from the Applicant on this issue. The first draft SOCG does not include this as a separate item. We are not currently satisfied with the Applicant's comments on this issue.	The Applicant has responded to comments relating to RR ID EA16 in Table 2-1, Section 16 on Page 31 of the **Applicant's Response to Relevant Representations [REP1-047]** as follows: The Applicant agrees to commit to automated penstocks. The Framework Battery Safety Management Plan (BSMP) **[REP1-041]** has been updated and was submitted to the Examination at Deadline 1. The Framework BSMP now includes the following text at paragraph 4.3.7: "*The BESS will integrate an external firefighting water capture drainage system. In the event of a fire, and prior to applying the fire water, the outfalls from the BESS areas will be closed via automatic penstock valves or similar systems, isolating the BESS areas drainage from the wider environment*." Paragraph 4.5.5 also now reads: "*In the event of a fire, and prior to applying the fire water, the outfalls from the BESS areas will be closed via automatic penstock valves or similar systems, isolating the BESS areas drainage from the wider environment*." The Applicant also acknowledges the requirement for maintenance/testing of the penstock valves. The Framework BSMP **[REP1-041]** has been updated and was submitted to the Examination at Deadline 1. The Framework BSMP now includes the following text at paragraph 3.2.12: "*Furthermore, penstocks will be inspected and operated as per proprietary manufacturer requirements and specifications; either at least once every 6 months or as per the specification, whichever is the shorter time period prescribed, to ensure they are not seized and are clear of debris and obstructions to free flow*." The Framework BSMP **[REP1-041]** is a secured DCO document, and as such will secure the requirement for ongoing maintenance of the penstock valve as above. The Framework BSMP is to be developed into a detailed BSMP, substantially in accordance with the Framework BSMP, secured under Requirement 7 of Schedule 2 to the Draft DCO **[REP1-007]**. It is noted that the Environment Agency is a named consultee under sub-paragraph (4) of this Requirement, and as such the Environment Agency will have the opportunity to review the detailed BSMP prior to any approval. This position on RR ID EA16 will be updated within the SoCG between the Applicant and the EA, to be submitted at Deadline 3A of the Examination as noted above.

Ref. No.	Theme	Environment Agency's Written Representation / Summary of Written Representation	Environment Agency's Applicants Response to Written Representation
REP1-071	Surface water quality; groundwater and contaminated land; waste	**RR ID EA22: Storage of Waste Batteries** - Progress has been made on this issue, but it remains unresolved at this time. The Applicant has provided a response to us on this issue in the first draft SOCG, and it was discussed in Issue Specific Hearing 2 in relation to the BESS. Please refer to our comments in response to the Environment Agency action point from this hearing. We have provided the Applicant with the relevant guidance and further comments in response to the Applicant's response in the draft SOCG. We will continue to engage with the Applicant on this issue and provide an update at the next relevant deadline.	The Applicant notes this comment and will continue to engage with the EA through the Statement of Common Ground to be submitted at Deadline 3A of the Examination. The Applicant has responses to the comments raised within the Environment Agency's Post Hearing Submission within Section 2.4 of the Applicant's Response to Post Hearing Summaries **[EN010154/EXAM/9.11]**.

2.3 National Grid Electricity Transmission PLC [REP-072]

Table 2-3: Applicant's Responses to Written Submissions at Deadline 1 – National Grid Electricity Transmission PLC

Ref. No.	Theme	National Grid Electricity Transmission PLC Written Representation / Summary of Written Representation	Applicants Response to National Grid Electricity Transmission PLC Written Representation
REP1-072	Protective Provisions	NGET will require Protective Provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. In particular, NGET will require these Protective Provisions to protect its proposed Navenby 400kV Substation project which is critical to the delivery of the Fosse Green Energy Project as well as providing additional capacity on the transmission network in order to meet wider customer demand. NGET is liaising with the Applicant in relation to bespoke protective provisions in respect of NGET's current and future assets. NGET will continue to liaise with the Applicant with a view to concluding matters as soon as possible during the DCO Examination, keeping the Examining Authority updated in relation to these discussions.	As noted within Table 2.8, Section 3 on Page 91 of the Applicant's Response to Relevant Representations **[REP1-047]**, negotiations between the Applicant and NGET regarding protective provisions are progressing well and nearing agreement. The Applicant expects to incorporate these protective provisions in the Draft DCO **[REP1-007]** at or before the midpoint of the Examination, in line with the expectation set by the Examining Authority in its Procedural Decision dated 22 August 2025 **[PD-005]**. Engagement between the Applicant for the Proposed Development and the applicants for the proposed National Grid substation near Navenby has been undertaken and will continue as the Proposed Development progresses.

2.4 National Highways

2.4.1 National Highways (NH) Written Representation **[REP1-074]** summarises NH's outstanding concerns which are set out in detail within NH's Relevant Representation (RR-201). Therefore, Table 2-4 presents these summarised outstanding issues as detailed in the Written Representation **[REP1-074]**.

Table 2-4: Applicant's Responses to Written Submissions at Deadline 1 – National Highways

Ref. No.	Theme	National Highways Written Representation / Summary of Written Representation	Applicants Response to National Highways Written Representation
REP1-074	Protecting the SRN	Full details of NH's concerns with regard to works number 6 are set out within paragraphs 4.3- 4.6 of NH's Relevant Representation (RR-201). NH would like to understand if consideration has been given to a single trenchless cable crossing across the A46 trunk road as this option would reduce technical and construction risk on the SRN. NH require further engagement from the Applicant in order to understand the details of the cable crossing (Works No.6), how the cable route will interact with National Highways' assets and to determine if the cable crossing is feasible. The cross-section information provided on ES Figure 3-13 Typical Trenchless Crossings Cross Sections (APP-060) is insufficient to determine the geotechnical risks on the A46 trunk road and its assets, including drainage. Any proposed directional drilling under the SRN will require compliance with The Design Manual for Roads and Bridges (DMRB) Chapter CD622 (Managing Geotechnical Risk). This requirement can be addressed in the protective provisions. All Cable Works will require monitoring and assurance, with safety risks assessed for monitoring and survey works within the proximity of the A46 live carriageway. This requirement can be addressed in the protective provisions.	The Application includes the flexibility for a single trenchless crossing, should the detailed design identify this as being feasible and viable following further geotechnical survey and assessment. The parameters and assessment do not require two trenchless crossings to be built in the event that the Applicant can find a single trenchless crossing solution. This will be explored with NH at the post consent, detailed design stage. At this stage however the Applicant has reserved the right for – and assessed - two crossings, in case a single crossing is not feasible or viable. The Applicant has responded to comments relating to Work No. 6 in Table 2-7, Section 2 on Page 74 of the Applicant's Response to Relevant Representations **[REP1-047]** as follows: Two trenchless crossing locations, as indicatively shown in Figure 3-12: Indicative Trenchless Crossing Locations of the ES **[AS-028]**, are proposed due to the wide area that the cables originate from. This will decrease the concentration of cables in one area and reduce the overall cable lengths required. The Applicant will work with NH regarding the location of the A46 crossings through the production of a feasibility study for these works. As requested by NH, this study will provide further information on: • The cable duct specification (diameter, capacity, and whether multiple cables are proposed for future expansion or redundancy); • The proposed method of installation; and • Any related design or construction details. The design submitted as part of the DCO Application incorporates spatial flexibility within the Proposed Development Parameters **[REP1-029]** to account for any localised constraints which may be identified later in the process. As such, the purpose of Figure 3-13: Typical Trenchless Crossings Cross Sections of the ES **[APP-060]** is not to demonstrate the specific geotechnical risks on the A46 trunk road at specific crossing locations, since these could vary from location to location. The geotechnical risks (such as the bedrock being hard and therefore challenging to bore through) will be established as part of the detailed design stage once final locations of the trenchless crossing locations are known, aligning with other potential factors that may influence the detailed design (e.g. avoiding archaeological resource). It is confirmed that the Applicant will comply with DMRB Chapter CD622, and other relevant requirements for any proposed directional drilling under the NH network. The Applicant will secure these approvals and requirements through the protective provisions to be agreed with NH and inserted into Schedule 14 of the **Draft DCO [REP1-007]**.

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			The Applicant has responded to comments relating to Work No. 6 in Table 2-7, Section 2 on Page 74 of the Applicant's Response to Relevant Representations **[REP1-047]** as follows: With regards to consideration of the potential impact of drilling upon other SRN assets, such as drainage, it should be noted that a full clash detection exercise would be procured at the detailed design stage, when the design detail for the Proposed Development is more precise. The Framework CEMP **[REP1-031]** (ref. MAD-C1) notes: "*To identify any existing infrastructure constraints, both consultation and a desk-based study will be undertaken prior to construction so that appropriate mitigation such as buffers can be incorporated into the design. Cable Avoidance Tool (CAT) scans will also be used by Contractors to check for buried utilities prior to earth breaking site activities. The Applicant will endeavour to engage with utilities providers as appropriate*." The clash detection exercise would be undertaken at the earliest appropriate opportunity during the detailed design stage of the Proposed Development and any NH assets identified would be appropriately avoided by design. Production of a detailed CEMP, which is to be developed substantially in accordance with the Framework plan, is secured under Requirement 12 of the **Draft DCO [REP1-007].** Under the same Requirement, the detailed CEMP is to be submitted to the relevant planning authority (North Kesteven District Council) for approval, in consultation with Lincolnshire County Council, National Highways and the Environment Agency. The construction of the Proposed Development must be carried out in accordance with the approved CEMP. The protective provisions to be included in the DCO for NH apply to "specified works" which are defined as "*the installation of underground 33 kilovolt (kV) interconnection cables under the A46 or so much of any work, including highway works and signalisation, authorised by this Order including any maintenance of that work, as is on, in, under or over the strategic road network for which National Highways is the highway authority or land in which National Highways has an interest*". No specified works may commence until a condition survey and monitoring regime of any NH assets or structures that NH considers will be affected by the specified works have been agreed with NH. With regard to safety risks, the protective provisions include road safety audits (RSAs) at stages 1, 2 and 3 to be carried out in respect of all specified works. Any recommendations or exceptions raised by the RSAs must be approved by NH. In addition, specified works will be inspected by NH during construction and on practical completion, the latter initiating the process (for the Applicant) of applying for provisional and final certificates to be issued subject to NH approval.
REP1-074	Drainage	It is currently unclear from the Applicant's drainage proposals if the proposed swales within the application site outfall into the highway drainage system. If so, this would be a clear breach of Government policy. As set out within paragraph 4.9 of NH's Relevant Representation (RR-201), Paragraph 59 of DfT Circular 01/2022, provides NH cannot accept any additional water runoff arising from any change of use into the highway drainage systems, or any new connections into those systems from third party development drainage systems. To address NH's concern, NH seeks to be consulted on the written details of the surface water drainage scheme (please see comments at paragraph 2.10(c) below) and a condition within its protective provisions that article 17 may not be exercised in relation to the SRN or land NH has an interest in without NH's consent.	The Applicant has responded to NH's comments relating to Drainage in Table 2-7, Section 3 on Page 75 of the **Applicant's Response to Relevant Representations [REP1-047]** as follows: Appendix 9-D: Framework Surface Water Drainage Strategy (SWDS) of the ES **[REP1-025]** sets out the approach to surface water management. Surface water runoff will be collected and drained to surface water bodies, either to watercourses, or in certain cases, to ground where a watercourse is not present in the vicinity. No surface water drainage will be discharged to National Highway infrastructure during the operation of the Proposed Development. The only potential pathway of discharge to any highway infrastructure would be during the construction and decommissioning

Ref. No.	Theme	National Highways Written Representation / Summary of Written Representation	Applicants Response to National Highways Written Representation
		If the swales do not outfall into the NH drainage system, NH still expect to be consulted on the surface water drainage scheme and (if any) foul water drainage system for the Application site given the swales close proximity to the SRN and the flood risk involved. To address National Highways concerns, we would expect to be consulted on the written details of the surface water drainage scheme and (if any) foul water drainage system (please see comments at paragraph 2.10(c) (REP1-074).	works, if runoff cannot be drained on-site or to a watercourse. However, given that access to the Order Limits will not be via the SRN, there would be no potential mechanism for drainage to National Highways' infrastructure during these phases of the Proposed Development. Regarding maintenance, the Framework SWDS **[REP1-025]** (ref. paragraph 4.13.1) notes that the proposed SWDS will be maintained by the Applicant, or another private operator to be confirmed. The provision of a detailed SWDS, to be substantially in accordance with the Framework SWDS, is secured under Requirement 10 of Schedule 2 to the Draft DCO **[REP1-007]**, with all proposed drainage features maintained according to standard practice. As such, the Applicant does not consider there are any requirements for National Highways to be included as a consultee within Schedule 2, Requirement 10(1) (Surface and foul water drainage) of the Draft DCO **[REP1-007]**
REP1-074	Hedgerows	The Hedgerow Plan (APP-015) shows the existing hedgerows along the A46 will be unaffected by the authorised development except for hedge no. 265 along the A46 (see Fig 2.9 (sheet 4 of 16) Rev 02). Hedge no. 265 requires up to 7m of removal. However, it's unclear on the reasons why a section of Hedge no. 265 is required. NH seeks further details for review.	The Applicant has responded to NH's comments relating to hedgerows in Table 2-7, Section 4 on Page 76 of the Applicant's Response to Relevant Representations **[REP1-047]** as follows: Removal of this 7m section of Hedge no.265 is potentially required to accommodate a fence around the Solar PV Array areas within Fields 30 and 31. It should be noted that this removal would not remove any hedgerow immediately adjoining the A46 (i.e. the hedge that runs parallel to the westbound carriageway of the A46) and instead would be the removal of this section of hedge running perpendicular to the A46, between Field 30 and 31. This is best illustrated on Figure 3-17: Maximum Vegetation Removal Plan of the ES **[AS-029]** (ref. Sheet 4).
REP1-074	Landscape Mitigation for Glint and Glare	Some of the receptor points assessed next to the A46 were noted as high without mitigation but lowered to none with mitigation. In terms of the proposed mitigation, NH raised in its Relevant Representation (RR-201) at paragraphs 5.3-5.8 a number of queries on the proposed mitigation and current Landscape and Ecological Management Plan (LEMP). To address NH's concerns, NH seek consultation on the LEMP. NH seek to be consulted on the landscape and ecological management plan for reasons set out in NH's Relevant Representation (RR-201) and paragraph 2.4 of the Written Representation [REP1-074].	The Applicant has responded to comments relating to Landscape Mitigation for Glint and Glare in detail in Table 2-7, Section 5 on Page 76 of the Applicant's Response to Relevant Representations **[REP1-047]**. Given the measures set out in Table 2-7, Section 5 on Page 76 of the Applicant's Response to Relevant Representations **[REP1-047]**, and secured via the Framework LEMP **[AS-122]**, the Applicant does not consider it to be necessary for National Highways to be included as a consultee within Schedule 2, Requirement 8(1) (Landscape and ecological management plan) of the Draft DCO **[REP1-007]**.
REP1-074	Traffic Management Signage	As set out in paragraph 5.13-5.16 of NH's Relevant Representation (RR-201) NH have been unable to locate any reference to proposed signage on the SRN for the routing of construction vehicles. NH would expect such signage to be proposed to assist vehicles in utilising the A46 trunk road to access the Local Road Network (LRN) to ensure the safe and sufficient operation of the SRN and protecting all road users. To address NH's concern in this regard NH would expect to be consulted and provide approval to the construction traffic management plan. Please see our comments at paragraph 2.10(f) of NH Written Representation ([REP1-074]): NH seek to be consulted and provide approval to the CTMP for reasons set out within NH's Relevant Representation (RR-201) and paragraph 2.6 of this representation. Any temporary traffic management signs installed on the A46, require NH approval, a Road Safety Audit (RSA) and a Walking, Cycling, and Horse-Riding Assessment and Review (WCHAR)/ exception certificate. These requirements can be addressed in NH's protective provisions	The Applicant has responded to comments relating to Signage in detail in Table 2-7, Section 8 on Page 79 of the Applicant's Response to Relevant Representations **[REP1-047]**. While signage is not explicitly mentioned in the Framework CTMP **[REP1-043]**, signage will form a key part of the Temporary Traffic Management and will ensure that traffic utilises the designated routes. The Applicant will engage with NH (and LCC for local roads, as necessary) in developing the signage strategy as part of the detailed CTMP. This will include overall signage strategies for routes, including sign locations and sign face details for approval. For clarity, the Framework CTMP **[REP1-043]** has been updated to include the above text and an updated version is to be submitted to the Examination. This matter has been discussed with NH as part of the SoCG being agreed between the Applicant and NH, whereby NH confirmed on 19 January 2026 that they accept the above and are content for the status of this item to be 'Agreed' within the SoCG. The Applicant and NH will continue discussions to ensure that a final and signed SoCG is submitted at or

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			before Deadline 3A of the Examination (24 March 2026) in line with the Examination Timetable set out at Annex A to the Rule 8 Letter **[PD-010]**. The Applicant has also agreed to add NH as a consultee for the final CTMP under Requirement 14 of Schedule 2 to the Draft DCO **[REP1-007]**. This was reflected in the updated Draft DCO **[REP1-007]** submitted to the Examination at Deadline 1. The protective provisions for NH include provision for stage 1, 2 and 3 safety audits. No specified works – including temporary traffic management – may commence until stage 1 and 2 safety audits have been carried out and all recommendations raised through these or any exceptions are approved by NH. Where relevant, detailed design of the specified works must include information demonstrating that the Applicant has undertaken a walking, cycling and horse riding assessment and review process in accordance with DMRB GG142.
REP1-074	Construction Traffic Management Plan	As set out at paragraphs 5.17 of NH's Relevant Representation (RR-201) it is stated within the Construction Traffic Management Plan (CTMP) (APP-199) that the proposed A46 North Hykeham Relief roundabout and A46 Newark Bypass are anticipated to be constructed in advance of the Authorised Development peak construction phase year of 2032, and therefore will form part of the future highway network. These network upgrade schemes are not expected to overlap with the proposed construction phase of the Authorised Development which is anticipated to start at its earliest in 2031. However, A46 Newark Bypass has now been consented and timescales for delivery will not be available until March 2026. To address NH's concern, NH would seek to be consulted and provide approval to the CTMP.	The Applicant has responded to comments relating to the Framework Construction Traffic Management Plan in detail in Table 2-7, Section 8 on Page 79 and 80 of the **Applicant's Response to Relevant Representations [REP1-047].** An updated version of the Applicant's response regarding NH being consulted on the CTMP is provided below as follows: The Applicant agrees to include National Highways as a consultee within Schedule 2, Requirement 14 and has submitted an updated Draft DCO **[REP1-007]** to the Examination at Deadline 1. It should be noted that the potential cumulative impact of the Proposed Development in combination with these schemes was considered in the ES. As set out in Appendix 15-A: Long List of Cumulative Developments of the ES **[APP-177]**, the A46 Hykeham Relief Road scheme (ID95) was progressed to the cumulative schemes shortlist in Section 13.10 of Chapter 13: Traffic and Transport of the ES **[APP-038]**, where its potential for a likely significant cumulative effect was considered. However, the scheme is expected to be operational from 2026 and therefore will form part of the future baseline highway network by 2032. On this basis, no cumulative assessment of this scheme was undertaken in Chapter 13: Traffic and Transport of the ES **[APP-038]** in this regard; an approach which was approved by National Highways with respect to the assessment of the National Highways section of the A46 within the study area. With regards to the Newark Bypass (ID100), as set out in Appendix 15-A: Long List of Cumulative Developments of the ES **[APP-177]**, there is limited potential for the construction phase to overlap with that of the Proposed Development (construction proposed to commence in 2031) even if there are minor delays to ID100, and there is no scope for operational cumulative effects. As such, this cumulative scheme was not progressed to the short list for cumulative assessment within Chapter 13: Traffic and Transport of the ES **[APP-038]**. The Applicant will work with National Highways and LCC with respect to the A46 Newark Bypass and A46 Hykeham Relief Road in the development of the detailed CTMP to coordinate with the delivery of these projects. As stated at paragraph 7.5.2 of the Framework CTMP **[REP1-043]**, the Transport Co-ordinator, who takes responsibility for implementing the CTMP, is required to liaise as appropriate with local transport and traffic groups, local planning authorities and local highway authorities

Ref. No.	Theme	National Highways Written Representation / Summary of Written Representation	Applicants Response to National Highways Written Representation
			and National Highways. This requirement for liaison will accommodate the collaborative coordination of potential cumulative traffic effects. The Framework CTMP is be developed into a detailed CTMP, substantially in accordance with the Framework Plan, secured under Requirement 14 of the Draft DCO **[REP1-007]**. The detailed CTMP will be required to be approved by the relevant authorities before construction commences, with National Highways a prescribed consultee.
REP1-074	Compulsory Acquisition	The book of reference as submitted by the Applicant identifies 10 plots of land owned or occupied by NH for the purposes of its undertaking ("Plots") in respect of which compulsory acquisition powers to permanently acquire new rights is sought. As set out in paragraph 6 of NH's Relevant Representation (RR-201) six of the ten plots namely, plots 2/7, 4/3, 4/5, 4/10, 4/11 and 4.13, are the A46 trunk road forming part of the SRN. We understand Works no 6 affects these plots. The nature and proposed scope of works remains unclear. To safeguard NH's interests and the safety and integrity of the SRN NH seeks further information from the Applicant to understand how the new rights will interact with National Highways' assets and additional information on the works proposed.	The Applicant has responded to comments relating to this comment in Table 2-7, Section 1 on Page 73 of the Applicant's Response to Relevant Representations **[REP1-047].** The Applicant's response is repeated below as follows: Within the plots along the A46 (4/3, 4/5, 4/10, 4/11, 4/13 and 2/7), as per the Book of Reference **[AS-115]**, it is proposed that cable crossings will be provided under the surface of NH land, installed via directional drilling. No direct interaction with the A46 carriageway or interference with the existing rights of NH is proposed. In terms of plots Plot 2/8, 2/10 and 2/11, it is proposed to create construction access C-002 and operational access O-002 (see Figure 3-1: Construction Compound and Access Locations of the ES **[AS-021]**) onto the public highway within the extents of this plot, and similarly within Plot 4/15 operational access O-003 is proposed to be created. It is not proposed to interfere with the existing rights of NH in either location.
REP1-074	Abnormal Loads	NH understand the project will require abnormal loads for specific equipment and materials (elements such as transformers) to the site on the SRN. NH have set out the detail of its requirements and discussions so far with the Applicant in this regard at paragraphs 5.18-5.22 of its Relevant Representation (RR-201).	The Applicant has responded to comments relating to abnormal loads in Table 2-7, Section 9 on Page 80 of the Applicant's Response to Relevant Representations **[REP1-047]**. An updated version of the Applicant's response is provided below: It should be noted that abnormal loads have been assessed within Chapter 13: Traffic and Transport of the ES **[APP-038]** (with regards to 'Large Loads'). As noted in paragraph 13.7.61, all link and junction receptors were judged to have Negligible impacts for Large Loads with the exception of L8 (A46 west of Hykeham Roundabout), which was judged to have a Minor impact in this category. As noted above, the Applicant has included National Highways as a consultee within Schedule 2, Requirement 14 (Construction traffic management plan). The Applicant has submitted an updated version of the Draft DCO **[REP1-007]** to the Examination at t Deadline 1 reflecting this change. As a result, NH will be a prescribed consultee in respect of the final CTMP, whereby the Applicant will continue to work collaboratively with NH in order to obtain the necessary approvals/permits for access to the Order Limits by abnormal loads. Furthermore, it is noted that the matter of abnormal loads is under discussion with National Highways as part of the SoCG between the Applicant and National Highways. The Applicant will continue discussions on this matter to ensure that the final and signed SoCG with National Highways is available to be submitted at the midpoint of Examination, in line with the Examining Authority's request in its Procedural Decision dated 22 August 2025 **[PD-005]**.
REP1-074	Draft DCO – Article 8	Article 8 - This article provides the Applicant with the power to enter on so much of any of the streets specified in Schedule 4 of the dDCO to carry out any street works. It is however noted that the works proposed to be carried out beneath the A46 trunk road shown on the Indicative Trenchless Crossing Locations document (APP-059) are not included within that schedule. NH have set out its concerns in this regard in detail within its Relevant Representation (RR-201) within the table at paragraph 7.2. To ensure that the applicant can carry out their works without committing an offence pursuant to section 51 of the New Roads and Street Works Act 1991 we would request the Applicant updates Schedule 4 to include the crossing points on the A46 to ensure they have the statutory authority to do so.	As submitted in NH's oral submissions at ISH2 and noted in the Written Summaries of Oral Submissions **[REP1-044]** and the Applicant's Response to Relevant Representations **[REP1-047]** the Applicant agrees that the proposed crossing points under the A46 should be included in Schedule 4 of the Draft DCO **[REP1-007]**. However, the exact crossing points have not yet been determined, and will not be until the detailed design stage, which will be undertaken post-consent. Therefore, the Applicant has inserted the following wording into Schedule 4 of the Draft DCO **[REP1-007]** - "*those parts of the A46 that are within the limits of deviation of Work No. 6*" with the description of the street works being "*Street works to facilitate underground cable installation works for the length of the A46 shown in green patterned hatching on*

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			Sheet 4 of the streets, rights of way and access plans". NH confirmed support for this approach in its oral submissions at ISH2 as noted in the Written Summaries of Oral Submissions **[REP1-044]**. This wording was included in the updated Draft DCO **[REP1-007]** submitted to the Examination at Deadline 1.
REP1-074	Draft DCO – Schedule 2 (Requirements)	NH raised comments within its Relevant Representation (RR-201) at paragraph 7.2 about the requirements at schedule 2 of the dDCO, the following remain outstanding: a) Requirement 4- NH seek to be consulted and provide approval to any amendments to the approved documents, plans details and schemes to any requirement that may affect the SRN or land NH has an interest in. Full justification is provided within the Relevant Representation (RR-201). b) Requirement 8- NH seek to be consulted on the landscape and ecological management plan for reasons set out in NH's Relevant Representation (RR201) and paragraph 2.4 of this representation. c) Requirement 10- NH seek to be consulted on the written details of the surface water drainage scheme and foul water drainage system for reasons set out in NH's Relevant Representation (RR-201) and paragraph 2.3 of this representation d) Requirement 12- NH seek to be consulted on the construction environmental management plan for reasons set out in NH's Relevant Representation (RR-201) e) Requirement 13- NH seek to be consulted on the operational environmental management plan for reasons set out within NH's Relevant Representation (RR-201) f) Requirement 14- NH seek to be consulted and provide approval to the CTMP for reasons set out within NH's Relevant Representation (RR-201) and paragraph 2.6 of this representation g) Requirement 20- NH seek to be consulted on the decommissioning environmental management plan for reasons set out within NH's Relevant Representation (RR-201)	Comprehensive responses to these comments have been provided in the appropriate sections of this document and in the Applicant's Response to Relevant Representations **[REP1-047]**. However, for completeness, the current position is provided below. a) The Applicant inserted a new sub-paragraph to Requirement 4 of Schedule 2 as follows *"(2) In determining whether to approve any amendments to any of the approved Documents, Plans, Details or Schemes, the relevant planning authority must re-consult all consultees that were required to be consulted on those Documents, Plans, Details or Schemes when those Documents, Plans, Details or Schemes were originally approved."* b) The Applicant does not consider it necessary for NH to be included as a consultee for Requirement 8 (Landscape and ecological management plan) of Schedule 2 for the reasons already set out above. c) The Applicant does not consider it necessary for NH to be included as a consultee for Requirement 10 (Surface and foul water drainage) of Schedule 2 for the reasons already set out above. d) The Applicant has agreed to include NH as a consultee under Requirement 12 of Schedule 2 in relation to the Construction Environmental Management Plan. e) The Applicant has agreed to include NH as a consultee under Requirement 13 of Schedule 2 in relation to the Operational Environmental Management Plan. f) The Applicant has agreed to include NH as a consultee under Requirement 14 of Schedule 2 in relation to the Construction Traffic Management Plan. g) The Applicant has agreed to include NH as a consultee under Requirement 20 of Schedule 2 in relation to the Decommissioning Environmental Management Plan. The agreed amendments in relation to items (a), (d), (e), (f) and (g) above were reflected in the updated Draft DCO **[REP1-007]** submitted to the Examination at Deadline 1.
REP1-074	Protective Provisions	Despite the submissions within paragraph 7.2 of NH's Relevant Representation (RR-201), as set out in our submissions at Issue Specific Hearing 2, NH are no longer seeking to be consulted on Requirement 7 of Schedule 2 of the dDCO.	The Applicant acknowledges this comment.
REP1-074	Fencing and other means of enclosure	In relation to its request to be consulted on requirement 9, NH requires further information from the Applicant and clear proposals demonstrating adequate setback distances from the edge of the carriageway to ensure compliance with policy (DfT Circular 01/2022, paragraph 57) before it can withdraw its concern in this. In general terms, structures should be located sufficiently far from the SRN boundary so that they cannot topple onto	The Applicant notes that during the oral submissions made by NH at Issue Specific Hearing 2 (ISH2), it was stated that upon further consideration NH no longer require to be consulted on the provision of fencing and other means of enclosure under Requirement 9 of Schedule 2 to the Draft DCO **[REP1-007]**. This is reflected in the

Ref. No.	Theme	National Highways Written Representation / Summary of Written Representation	Applicants Response to National Highways Written Representation
		the SRN or undermine its geotechnical integrity. In addition, sufficient space must be retained to allow NH to undertake all routine and emergency maintenance activities for the A46 trunk road. At present, no plans have been submitted that clearly show the distance from the SRN, including foundation design and parameters.	Applicant's written summaries of oral submissions at ISH2 and NH indicated that this would be reflected in its Deadline 1 submission.
REP1-074	Protective Provisions	Discussions with the Applicant on the matters raised in NH's Relevant Representation (RR-201) and summarised within paragraph 2 of this representation are progressing well. NH and the Applicant are negotiating a statement of common ground and the Applicant is considering the concerns NH has raised above. We hope to be in a position to report some of the matters raised above are resolved at the next deadline.	The Applicant acknowledges this comment and will continue to engage with NH through the Statement of Common Ground to be submitted at Deadline 3A of the Examination (24 March 2026) in line with the Examination Timetable set out at Annex A to the Rule 8 Letter **[PD-010]**.
REP1-074	Protective Provisions	Discussions with the Applicant on the protective provisions are also progressing well. Therefore, NH do not propose to detail the articles of concern in the Applicant's Draft DCO in this representation as it is likely from the drafting that has been agreed so far, those concerns will be addressed in the protective provisions that NH expects the Applicant to introduce when it next updates the Draft DCO. NH hope to deliver positive news at the next deadline in relation to the protective provisions however if we cannot finalise negotiations we reserve the right to provide a full response on the articles of concern at the next deadline, and introduce a set of protective provisions that National Highways would ask the ExA to include in its recommended DCO.	The Applicant agrees that discussions on the protective provisions are progressing well. The Applicant will include the protective provisions in the Draft DCO **[REP1-007]** once these are formally agreed.

2.5 Natural England [REP1-076]

2.5.1 Natural England note within their Written Representation **[REP1-076]** that since submission of NE's Relevant Representation (RR-202), the Applicant has issued a draft Statement of Common Ground issued to NE which included responses to the issues raised in NE's Relevant Representation (RR-202). NE have made comment on this document, and it is due to be submitted into Examination at the next available deadline. NE reported in their Written Representation **[REP1-076]** that the additional information and updates made by the Applicant have addressed all of their concerns and whilst some issues remain labelled as 'yellow' (meaning NE do not agree on the matter, but are satisfied that for this particular project it is unlikely to make a material difference to NE's advice or the outcome of the decision-making process), there are no outstanding 'Amber' issues. As such, Table 2-5 below only includes and responds to matters identified within NE's Written Representation that warrant further clarification or explanation from the Applicant.

Table 2-5: Applicant's Responses to Written Submissions at Deadline 1 – Natural England

Ref. No.	IP Name	Theme	Natural England Written Representation / Summary of Written Representation	Applicants Response to Natural England Written Representation
REP 1-076	Natural England	Soil Management Plan	The applicant has agreed to include NE as a consultee on the SMP within the draft SoCG (dated 22 December 2025) and this amendment should be included in the updated Draft DCO to be submitted at the next examination deadline.	The Applicant has agreed to include Natural England as a consultee on the Soil Management Plan (SMP) under Requirement 15 of Schedule 2 to the Draft DCO **[REP1-007]**. This is reflected in the updated version of the Draft DCO **[REP1-007]** submitted to the Examination at Deadline 1. The provision of a detailed SMP, which is to be substantially in accordance with the Framework, is secured under Requirement 15 of Schedule 2 to the Draft DCO **[REP1-007]** and, by virtue of the same Requirement, must be implemented as approved.
REP 1-076	Natural England	Soil Management Plan	The applicant has provided a breakdown of land take for each element of the proposal within their draft SoCG (dated 22 December 2025). This is welcomed by NE and clearly illustrates the amounts of land, and BMV land, to be affected by each element of the proposal. NE also welcome the amendment to the fSMP to ensure full methods for reinstatement of each element of the development are included in the detailed SMP.	The amendment referred to by Natural England is to paragraph 7.1.1 of the Framework SMP **[REP1-037]** which now reads: "*Prior to construction, site and soil-specific measures will be set out in a SMP, based upon this FSMP as a minimum, and supplemented by additional survey data where required. The detailed SMP will set out in full the methods for reinstatement (as relevant) to ensure the soil resource is managed effectively according to its ALC, and BMV resource is retained (as relevant) across the DCO Site".* This amendment is reflected in the update Framework SMP **[REP1-037]** submitted to the Examination at Deadline 1.

2.6 Network Rail Infrastructure Limited [REP1-078]

Table 2-6: Applicant's Responses to Written Submissions at Deadline 1 – Network Rail Infrastructure Limited

Ref. No.	IP Name	Theme	Network Rail Infrastructure Limited Written Representation / Summary of Written Representation	Applicants Response to Network Rail Infrastructure Limited Written Representation
REP 1-078	Network Rail Infrastructure Limited	Protective Provisions	Network Rail noted that the Draft Order (document reference number 3.1) does not afford any protective provisions for the protection of the railway, not least in a form that is considered by NR to sufficiently protect its Rights (As set out in the Relevant Representation dated 27 October 2025) and to ensure the safe and efficient operation of the railway (Protective Provisions). In order to be in a position to withdraw its objection, Network Rail will require: • suitable protective provisions to be included within the DCO to ensure that the Applicant is obliged to preserve the Rights and is restricted from exercising compulsory acquisition powers under the DCO which would have the effect of extinguishing the Rights, as set out in Appendix 1 of our Relevant Representations; and • a private agreement to be entered into with the Applicant obliging the Applicant to preserve the Rights and ensure that the new rights sought are exercised in a regulated manner to prevent adverse impacts to Network Rail's ability to comply with its liabilities and obligations. Network Rail and the Applicant are in discussions as to the requirements set out above and hope to reach agreement in order to facilitate the withdrawal of Network Rail's objection. As the current Draft DCO does not contain any restriction on the Applicant from extinguishing the Rights as at the date of this Written Representation Network Rail continues to object to the making of the Order on the grounds that the extinguishment of the Rights may compromise Network Rail's ability to ensure Network Rail can comply with its obligations to third parties to maintain specific works and may interfere with the safe and efficient operation of the railway network. Network Rail also continue to review whether there are any currently unidentified property rights, and/or any indirect impacts on Network Rail assets, which may be affected by the Scheme. They reserve their position on any such property rights and will provide fuller comment should any conflicts with railway property and/or rights be identified.	The Applicant notes this objection by Network Rail. The Applicant has carried out a thorough review of Network Rail's interests in the Proposed Development and believes that there is no existing rail infrastructure which warrants the provision of protective provisions for the sake of safeguarding national rail infrastructure. The Applicant has identified a number of historic land interests to which Network Rail has the benefit. The Applicant's position is that it would be more appropriate to focus discussions on these interests. The Applicant is seeking to engage with Network Rail, through their solicitors, in order to agree the relevant protections in favour of Network Rail, and to enter into an agreement to ensure that the new rights sought by the Applicant are exercised in a way which will prevent adverse impacts on Network Rail's interest in the relevant Plots of land. The Applicant has been attempting to progress with meaningful engagement with Network Rail since at least December 2024 but, save for the written submissions made to this Examination, has not received any substantive comments on the impacts of the Proposed Development to operational rail infrastructure. The Applicant was advised by email on 30 January that Network Rail is carrying out assessments in relation to indirect impacts on the railway, but a detailed response is awaited. Until such information is provided, the Applicant is of the view that its proposals mentioned above should be sufficient to protect Network Rail's land interests. The Applicant has responded to comments within Appendix 1 of Network Rail Infrastructure Limited's Relevant Representations (RR-205) in detail in Table 2-2, Section 1-21 on Pages 42-51 of the Applicant's Response to Relevant Representations **[REP1-047].** A Statement of Common Ground has been prepared between the Applicant and Network Rail Infrastructure Limited and will be submitted to the Examination at Deadline 3a.

3. Applicant's Response to Written Representations at Deadline 1 – Non-Statutory Organisations

3.1 Cliff Villages Solar Action Group [REP1-079]

Table 3-1: Applicant's Responses to Written Submissions at Deadline 1 – Non-Statutory Organisations – Cliff Villages Solar Action Group

Ref. No.	Theme	Cliff Villages Solar Action Group Written Representation / Summary of Written Representation	Applicants Response to Cliff Villages Solar Action Group Written Representation
REP1-079	Walking Routes	Comment that much of the Viking Way and other walks are impacted by the application along significant stretches of travel.	The Applicant acknowledges the potential for adverse effects on the visual amenity of users of the Viking Way resulting from the Proposed Development. With regards to the Viking Way, Viewpoints 13 (PRoW Cole/2/1) and 15 (PRoW BooG/2/2) of Figure 10-8: Viewpoint Photography of the ES **[APP-095]**) illustrate the potential impact of the Proposed Development. Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** concludes that at these locations there would be a moderate adverse (significant) visual effect during winter of the construction phase of the Proposed Development reducing to minor adverse (not significant) in the winter of Years 1 and 15 of operation of the Proposed Development. As such, significant adverse landscape and visual effects at these viewpoint locations would be for the short term during construction. There are no significant long term visual effects anticipated on residents of local villages, the Lincoln Cliff LCT, Sub-area 6: Lincoln Cliff and Lincoln Cliff LLCA, as, by Year 15 of operation, the proposed landscaping would have matured such that views of solar PV infrastructure within the Principal Site would be sufficiently screened. As set out in Appendix 10-G: Landscape and Visual Amenity Study Area Analysis of the ES **[APP- 154]**, views were assessed from several points along the Viking Way, these are mapped in Figure 10-9: Scoping Viewpoint Locations of the ES **[APP-096]**. In summary: • WA1 View from Viking Way (Wdgn 5/2), west of Mettam Road - Residents and users of the Viking Way currently experience very limited views of the Order Limits over 5km away. People in this location are unlikely to experience any changes as a result of the Proposed Development due to the relative distance and intervening vegetation within the vales. • NA3 View from Viking Way (Nave 6/1), northwest of Navenby - Residents of Navenby experience partial views of the Order Limits in the far background. People in this location are unlikely to experience any changes as a result of the Proposed Development due to the relative distance and intervening vegetation within the vales. • NA4 View from Viking Way (Wlgr 6/1), west of Wellingore - Residents of Wellingore experience partial views of the Order Limits in the far background. People in this location are unlikely to experience any changes as a result of the Proposed Development due to the relative distance and intervening vegetation within the vales.
REP1-079	Views from Witham St Hughs	Comment regarding the private view held by residents of Witham St Hughs.	The Applicant has sought to minimise the landscape and visual impacts of the Proposed Development in its pursuit of securing good design as set out in the Design Approach Document **[APP-186]**. The Applicant acknowledges that there would be some adverse effects on the visual amenity of Witham St Hughs resulting from the Proposed Development, as detailed within Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**, but considers that these

Ref. No.	Theme	Cliff Villages Solar Action Group Written Representation / Summary of Written Representation	Applicants Response to Cliff Villages Solar Action Group Written Representation
			would only be in the short term during construction. There are no significant medium- or long-term visual effects anticipated on residents of Witham St Hughs as, by Year 1 (and by extension at Year 15) of operation, the proposed landscaping would have matured such that views of solar PV infrastructure within the Principal Site would be screened. The scale of the Proposed Development has been informed by a comprehensive, iterative design process that has sought to minimise landscape and visual effects, developed and refined in response to consultation feedback from statutory consultees, local stakeholders and persons with land interest, with such engagement helping to shape the layout and approach to land use to minimise environmental impacts. The Proposed Development does not physically surround any village, the individual areas of proposed infrastructure are located at varying distances from settlements and are separated by existing landscape features, agricultural land, and new mitigation planting. Although nearby villages lie in relative proximity to parts of the Proposed Development, the Proposed Development has been designed such that it does not physically surround any of these villages. Instead, each village retains separation from the Principal Site by intervening farmland, existing landscape features and new mitigation planting.
REP1-079,	NESO connection reform	Comment that data from the published Connection Reform Results of the National Energy Systems Operator (NESO) and the Solar Power Portal shows that the UK is well on the way to achieving the UK Clean Power Plan 2030 targets for renewable energy generation without the Fosse Green Energy proposal, which is shown as not having a gate connection. Applications that can connect to an extant, built grid connection should be prioritised with greater weight of benefit over a scheme that cannot guarantee a grid connection. The NESO connections reform and solar already in place, together shows the need for renewable energy is fulfilled and that it is not including this application according to their website.	The solar component of the Proposed Development has secured a Gate 2 connection and has an agreement with NESO to connect to the National Electricity Transmission System. The current date for that connection is May 2033, with NESO having confirmed that the connection date will be in the second phase of prioritisation, Phase 2 – between 2031 and 2035. The exact date has not yet been confirmed but the timeline states that, as a post-2030 transmission scheme, the connection date should be confirmed no later than Q3 of 2026. The BESS component of the Proposed Development has secured a Gate 1 connection which means the BESS component has a connection agreement with NESO, but the connection date has not yet been confirmed and is 'indicative'. The timeline shows that the BESS component of the Proposed Development should receive its final customer offer 'later in 2026' although at that time, the Applicant will not be assigned a confirmed connection date. Following the granting of development consent (if granted) the Applicant would re-submit the BESS component to a future re-prioritisation round. Further detail regarding Connections Reform in relation to the delivery of generating stations and BESS is set out at Appendix A to the Written Summaries of Oral Submissions (ISH1) **[REP1-046]**. It should be noted that the Proposed Development is included in NESO's results of its first round of reforming the GB connections queue published in December 2025. Therefore, the contribution of the Proposed Development has been factored into the capacities prioritised for connection.
REP1-089,	Site Selection	Concerns with regards to the process of Site Selection and Policy Conflict. Comments are raised that the applicant misrepresents national policy when claiming alignment with NPS EN 1 and EN 3. Concern that the applicant's Site Selection Report confirms the site was chosen because it was offered by local landowners, not because it complied with national policy priorities.	The Applicant has responded in detail to comments regarding Site Selection in **Table 7-12** (Pages 320-326) of the Applicant's Response to Relevant Representations **[REP1-047]**.

Ref. No.	Theme	Cliff Villages Solar Action Group Written Representation / Summary of Written Representation	Applicants Response to Cliff Villages Solar Action Group Written Representation
			Furthermore, as set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**, the identification of the site for the Proposed Development was driven by the availability of deliverable land and site suitability in accordance with the requirements of policy. Section 2 of Appendix A: Site Selection Report of the Planning Statement **[AS-098]** sets out the relevant policy, and Section 3.3 describes how planning and environmental constraints were considered, taking into account the requirements of policy. For example, internationally and nationally designated biodiversity sites were excluded and in terms of flood risk which requires a sequential approach, the Applicant considered land at lower risk of flooding (Flood Zone 1) in the search for an unconstrained site before introducing Flood Zones 2 and 3 into the area of search at a later stage. Appendix A: Site Selection Report of the Planning Statement **[AS-098]** also sets out how the Applicant sought to reduce the need for the use of Compulsory Acquisition powers, meaning that the availability of landowners willing to lease land for the Proposed Development was an important consideration. Taking account of the suitability of the location for solar infrastructure, the availability of a network connection, appraisal of planning and environmental constraints and willing landowners, the Site was selected to be taken forward for the Proposed Development. Following site selection, and through the process of design evolution, the Applicant has sought to minimise impacts wherever possible. As set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**, the process for site selection was as follows: • Stage 1 - The area of search was based on the point of connection at the proposed National Grid substation near Navenby. The Applicant considered that 15km from the point of connection was the maximum distance for a viable project of this scale. This took into account cost of the infrastructure and construction, and the preference to limit the extent of environmental impacts and disruption which increase as the length of the cable corridor increases. • Stage 2 – Land with planning and environmental constraints were excluded from initial consideration in order to identify unconstrained land, including BMV, areas of flood risk, ecological sites and heritage assets etc. • Stage 3 - Potential alternative sites were identified on this unconstrained basis. • Stage 4 - Potential alternative sites were assessed against the following criteria: Land Use, Grid connection, ecological and geological sites, landscape and visual, cultural heritage, access for construction traffic, flood risk, solar array shading, topography, site size. • Stage 5 - constraints were then introduced to enable consideration of further sites identified against the criteria above. Land availability was also considered in order to examine whether a deliverable site could be assembled, since this reduces or potentially avoids the need for compulsory acquisition powers to be used. The Applicant sought to identify a site in as few land ownerships as possible within the area of search to aid with deliverability of the proposed development.

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			The site selection process seeks to verify the location of the Proposed Development by considering whether the site is the most suitable for the purposes of the Proposed Development taking into account operational requirements, national and local planning policy and environmental constraints.
REP1-082	Site Selection Policy	Comment that the scale of the Proposed Development is far greater than that envisaged for solar deployment by the Central Lincolnshire Local Plan. The Central Lincolnshire Local Plan has a presumption in favour of proposals for ground based photovoltaics and associated infrastructure, including commercial large scale proposals, unless there is clear and demonstrable significant harm arising and/or the proposal is to take place on Best and Most Versatile (BMV) agricultural land. “Large scale” is not defined in the Local Plan, finally adopted in April 2023, but certainly was not intended on a scale of thousands of acres of farmland, with the significant impacts that result	As detailed in the Statement of Need **[APP-184],** the Government recognises in the Overarching National Policy Statement for Energy (NPS EN-1) that growth in large-scale solar schemes will be essential in meeting the UK’s energy security and decarbonisation needs. The Gate 2 offer has also confirmed that the Proposed Development is recognised by NESO as strategically needed. Whilst brownfield solar and other smaller scale energy schemes are likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Proposed Development, in line with NPS EN-1. No suitable areas of brownfield or non-agricultural land at the appropriate scale were found within a viable search area of the point of connection at the proposed National Grid Substation near Navenby. The design of the Proposed Development has sought to minimise impacts upon BMV agricultural land as explained in the Design Approach Document **[APP-186]** which sets out the design vision and principles that were developed at an early stage to provide a framework for design evolution. Design Principle 2 as detailed in Section 3.9 of the Design Approach Document **[APP-186],** relates to being sensitive to existing agricultural land and reducing development on BMV land. This has been achieved through the significant amount of retained arable land within the Order Limits (the DCO commits to 181 ha (447.3 acres) of retained arable land in the Framework LEMP **[AS-122],** which will be developed into a detailed LEMP (substantially in accordance with the Framework LEMP) under Requirement 8 of Schedule 2 to the **Draft DCO [REP1-007]).** This retained arable land affords ecological and economic benefits associated with nesting birds habitat and retained jobs, but it should be noted that this retained arable land covers a significant proportion (approximately 116 ha) of subgrade 3a BMV land. The Applicant assumes that the reference to policy contained in the Central Lincolnshire Local Plan relates to Policy S14 Renewable Energy which sets out the commitment of the Central Lincolnshire Joint Strategic Planning Committee to supporting the transition to a net zero carbon future, seeking to maximise appropriately located renewable energy generated in Central Lincolnshire and recognising that such energy is likely to be wind and solar based. The Applicant has taken account of Policy S14 in Appendix C Local Policy Accordance Tables of the Planning Statement **[AS-098]** and has provided detailed commentary demonstrating how the Proposed Development is in compliance. Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** assesses the effects with regards to the permanent loss of the 1.5ha of BMV as a result of ecological enhancements associated with the Proposed Development, and the long term, reversible change of use of 282.9ha (699 acres) of BMV (relating to the Solar PV Array elements of the Proposed Development) and concludes that the Proposed Development will have a ‘minor’ adverse effect on BMV land.

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REP1-082	Cumulative Effects on Landscape Character	The direct and cumulative impacts on landscape character are wholly unacceptable. The visual impacts of the Fosse Green Energy proposal on the landscape and character of the rural areas immediately surrounding the site, and the cumulative impacts of the many renewable energy projects within a 15km radius of Navenby that will be triggered by the approval of the Fosse Green Energy DCO application, will be devastating and are wholly unacceptable. The landscape of pleasant villages in attractive countryside will change to a landscape dominated by industrial solar deployment and associated infrastructure.	The Applicant has sought to minimise landscape and visual impacts of the Proposed Development in its pursuit of securing good design as set out in the Design Approach Document **[APP-186]**. The Applicant acknowledges that there would be some adverse landscape and visual effects resulting from the Proposed Development, as detailed within Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**, but it is widely accepted that some level of adverse impact is inevitable. This is reflected in the Overarching NPS for Energy (EN-1), paragraph 5.10.5 which states that *"virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation."* With regards to changing the nature of the landscape, it is important to note that the Proposed Development is not permanent. The Applicant is seeking consent for a 60-year operational lifetime for the Proposed Development. Under Requirement 20 of the Draft DCO **[REP1-007]**, decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational life of the Proposed Development, the land will be returned to the landowners and available for its existing use. Although it would be the decision of the landowners whether to return the land to its existing use, any material change of use would require planning permission. The landscape and visual cumulative assessment (see Section 10.10 of Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** considers the potential cumulative impact of ten developments within the 2km Zone of Influence, as well as four solar NSIPs (Springwell Solar Farm, Great North Road Solar, One Earth Solar Farm, and Leoda Solar Farm) due to their similar scale and typology to the Proposed Development. The cumulative assessment concluded that, by Year 15 of Operation, there would be no notable difference between the landscape and visual effects of the Proposed Development in isolation, and the cumulative landscape and visual effects of the Proposed Development and the assessed cumulative schemes. The potential for significant cumulative landscape and visual effects of other solar NSIPs within Lincolnshire in combination with the Proposed Development has also been considered within the Joint Interrelationship Reports prepared for the respective examinations of such schemes, including, Springwell Solar Farm **[EN010149]**, Tillbridge Solar Project **[EN010142]**, West Burton Solar Project **[EN010132]**, and Cottam Solar Project **[EN010133]**. These Reports found that, given the notable distances and lack of intervisibility between these schemes and the Proposed Development, there was no potential for significant cumulative effects. If further projects come forwards, as a result of the proposed National Grid substation near Navenby being operational (not the Proposed Development), these projects would need to undertake their own cumulative landscape assessment based on the factors relevant at that time.
REP1-082	Battery Safety	Battery safety is a major concern The UK Health Security Agency's latest advice on BESS safety is powerful, raising concerns about the safety of battery storage units (Appendix 1). The Fosse Green Energy	The Applicant is aware of and has taken account of the DESNZ, HSE and UKHSA guidance on battery safety (including Annex 1 on technical standards). As set out within the Framework BSMP **[REP1-041]** (ref. paragraph 2.3.5) the

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		BESS should not be given permission until the regulations on safe distances from homes are clearer and wider safety regulations are developed and implemented.	Applicant has committed to ensure a minimum buffer of 150m from the distributed BESS units to residential receptors, and 200m from the centralised BESS units to residential receptors, which will avoid significant effects on nearby receptors in the unlikely event of a fire. Note that the Proposed Development is seeking a flexible consent in line with the 'Rochdale Envelope' for either distributed or centralised BESS, with the decision to proceed with one or the other to be made post-consent. The Proposed Development layout has been developed in consultation with LFRS and has taken account of current guidance from the NFCC. Further discussion with the LFRS on this topic will be considered and responded to as part of the Statement of Common Ground (SoCG), where the SoCG will be submitted at the midpoint of Examination in line with the Examining Authority's request in its Procedural Decision dated 22 August 2025 **[PD-005]**. In addition, engagement with the LFRS will continue throughout the detailed design phase post-consent and during the construction, operation, maintenance and decommissioning of the Proposed Development. Appendix 14-G: Unplanned Emissions Assessment of the ES **[APP-176]** assesses the impact of airborne chemicals and gases produced in the event of a BESS fire and shows that the dilution of gases and the distance from the BESS is sufficient to avoid any exceedances of airborne gas safety levels. The Proposed Development includes embedded design mitigation (see paragraph above and below) as well as protection measures to reduce fire/explosion risk, which are detailed in the Framework BSMP **[REP1-041]**. These measures include, for example, an automatic cooling system which will be integrated into the BESS to stop or reduce the risk of a cell from overheating and failing and triggering a chain reaction in neighbouring cells. Under Requirement 7 of Schedule 2 to the Draft DCO **[REP1-007]** a detailed BSMP must be developed and submitted to LCC for approval in consultation with Lincolnshire Fire and Rescue Services and the Environment Agency. This detailed BSMP must prescribe measures to facilitate safety during construction, operation, maintenance and decommissioning of the BESS. By virtue of Requirement 7 of Schedule 2 to the Draft DCO **[REP1-007]**, the detailed BSMP must be substantially in accordance with the Framework BSMP **[REP1-041]** and must be implemented as approved.
REP1-082	Recycling	Comment regarding a clear plan for recycling of old or damaged panels within 60 years as they are replaced and when the site is decommissioned, before any permissions are given. A significant bond will be needed up front to ensure that money is available should the developer or site operator collapse.	As outlined in paragraph 14.5.55 of Chapter 14 Other Environmental Topics of the ES **[APP-039]** "*The Proposed Development will aim to prioritise waste prevention, followed by preparing for reuse, recycling and recovery and lastly disposal to landfill as per the waste hierarchy*." Forecasts for waste arisings are outlined in Chapter 14 Other Environmental Topics of the ES **[APP-039]**: • Construction – refer to Table 14-24 Estimated Construction Waste, the specific waste management route would be confirmed by the construction contractor however the wastes listed are recyclable or recoverable; • Operation – refer to paragraph 14.5.84 Component Replacement Waste; and • Decommissioning – refer to Table 14-25 Estimated Decommissioning Waste, the specific waste management route would be confirmed by the

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			decommissioning contractor however the wastes listed are recyclable or recoverable. As detailed in the Framework CEMP **[REP1-031]** paragraph 2.8.1-4: "The Principal Contractor will separate the main waste streams on-site, prior to transport to an approved, licensed third party waste management facility for recovery, recycling or disposal. A Site Waste Management Plan (SWMP) will be prepared by the Principal Contractor, which will provide a waste estimate and specify key responsibilities, reporting and auditing requirements and waste recovery targets. The SWMP will be finalised with specific measures to be implemented prior to the start of construction. All waste to be removed from the DCO Site will be undertaken by fully licensed waste carriers and taken to licensed waste facilities and managed in line with the requirements of the Waste (England and Wales) Regulations (2011) and the Hazardous Waste (England and Wales) Regulations (2005). The Proposed Development will apply the waste hierarchy, in priority order; prevention, preparation for reuse, recycled, other recovery and disposal." The provision of a detailed CEMP, which is to be substantially in accordance with the Framework CEMP **[APP189]** is secured under Requirement 12 of Schedule 2 to the Draft DCO **[REP1-007]**. With regards to the comment in relation to a bond, the Applicant does not consider such a provision to be necessary or proportionate. Funding for restoration of land is not required to be secured under the Planning Act 2008, nor is the Applicant aware of any guidance requiring this in the NPSs or otherwise. Given that decommissioning of the Proposed Development is adequately controlled by virtue of the Framework DEMP **[REP1-035]** the Applicant considers that any further requirement would be a duplication of existing controls potentially creating confusion. a Framework DEMP has been provided, and the provision of a detailed DEMP is also secured via Requirement 20 of Schedule 2 to the Draft DCO **[REP1-007]**. At the end of the operational lifetime of the Proposed Development, it will be decommissioned in line with the controls of which will be set out in the detailed DEMP. Aas secured, under Requirement 20 of Schedule 2 to the Draft DCO **[REP1-007],** the DEMP (as approved by NKDC as the relevant planning authority in consultation with LCC, National Highways and the Environment Agency) must be implemented in relation to the works required to decommission the Proposed Development. This includes provisions for the land to be reinstated to its original quality before being returned to the landowners who would choose how the land is to be used and managed. As noted, this is secured by a DCO Requirement, and it should be noted that the breach of any commitments under a DCO amounts to a criminal offence and the provisions and Requirements of a DCO are enforceable by the Local Planning Authority. Given the legally binding obligation to carry out decommissioning works, including the funding of the same, the provision of a restoration bond is not justified.
REP1-082	Traffic Impact	Local roads will not be able to cope with the increased HGV traffic The narrow lanes and junctions are inadequate to accommodate the increase in HGV traffic	The potential effects of construction traffic on the local road network have been appropriately assessed in Chapter 13: Traffic and Transport of the ES **[APP-038]**, following the relevant legislation and planning policy set out in Appendix 13-A to the Chapter **[APP-163]**. The assessment concludes that the Proposed

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			Development is not expected to result in any significant effects upon traffic and transport receptors with the proposed embedded mitigation in place. The assessment utilised the shortest expected construction programme (24 months), which provides a worst-case scenario in terms of construction vehicle trips (a more condensed construction programme would result in a higher intensity of vehicle trips, the worst-case scenario would be the maximum trips per day) as this is based on a rapid, and therefore shorter construction period which would generate the highest number of peak hour and daily road trips on the local network. In addition, LCC and National Highways in their respective capacities as highway authority for the local road network and the strategic road network have deemed the impacts on the road networks to be acceptable in principle **[RR-157]** and **[RR-201]**. Measures to manage construction traffic, including site access, vehicle routing and staff travel are detailed in the Framework CTMP **[REP1-043]**. The CTMP sets out the management measures to minimise potential disruption to the local highway network and potential environmental effects associated with construction traffic. The provision of a detailed CTMP, which is to be substantially in accordance with the Framework CTMP **[REP1-043]**, is secured under Requirement 14 of Schedule 2 to the Draft DCO **[REP1-007]**.
REP1-082	Agricultural Economy	The impact on the agricultural economy has not been fully assessed, particularly in relation to the impact on agricultural suppliers and the downstream food supply chain.	The potential for the Proposed Development to impact upon food production is considered in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**. It is important to place the scale and nature of land use into context. As considered in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**, the total land area required for the Proposed Development represents approximately 0.09% of the total farmland within the East Midlands, and therefore constitutes a very small proportion of the regional agricultural resource. Furthermore, research undertaken by the Applicant in 2024 indicates approximately 50% of the land within the proposed Principal Site is currently used for the cultivation of non-food crops. Of this, the majority (approximately 81%) is grown for use as fuels for carbon-intensive energy sources, rather than for direct human or animal consumption. As such, while the land is agricultural in character, its current use does not solely support food production. The Proposed Development would therefore result in a limited and proportionate change in land use, set against the wider regional context and the Proposed Development's contribution to cleaner energy generation. Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** paragraph 12.7.52 notes that "It has been confirmed by all landowners that there is expected to be no job losses resulting from the removal of agricultural land." It should be noted that the Order Limits include a significant portion of retained arable land (a minimum of 181ha (447.3 acres) as secured via the Framework LEMP **[AS-122]**, a detailed version of which is to be provided, to be substantially in accordance with the Framework LEMP, under Requirement 8 of Schedule 2 to the Draft DCO **[REP1-007]**). This will allow current farming practices to continue whilst also providing other benefits, such as mitigation for ground nesting birds. This retained arable land includes approximately 116ha (286.6 acres) of Subgrade 3a BMV agricultural land.

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			Furthermore, to minimise the impacts of the Proposed Development on BMV land Chapter 12: Socio-Economic and Land Use of the ES **[AS-016]** (ref. paragraph 12.6.4) sets out embedded mitigation measures, including the use of panels at a height which could support sheep grazing throughout the operational phase of the Proposed Development. The Framework SMP **[APP192]** a detailed version of which is to be developed, substantially in accordance with the Framework SMP, as secured via Requirement 15 of Schedule 2 to the Draft DCO **[REP1-007]**, contains industry standard good practice mitigation measures to reduce impacts on soil which will ensure that the Agricultural Land Classification (ALC) grade of soils will be unaltered through construction (bar the 4.6ha (11.4 acres) of the Principal Site that is classed as permanently lost, due to the proposed landscaping that the Applicant does not intend to remove during decommissioning), operation and decommissioning of the Proposed Development.
REP1-082	BMV land and site selection	The loss of BMV agricultural land has not been justified. The initial selection of the Fosse Green Energy site did not involve a search for sites that would avoid the use of BMV agricultural land. It was purely a response to an approach from the landowners. The unnecessary loss of 284 ha of BMV agricultural land is significant. There is no evidence that the applicant has sought to minimise this loss through a genuine site search process.	Appendix A: Site Selection Report of the Planning Statement **[AS-098]** demonstrates how the Applicant has sought to identify a suitable site that is as least environmentally constrained as possible. Four potential alternative sites were considered, including Scopwick Heath, which was discounted on the basis of it being largely located on BMV Grade 2 land, despite being close to the point of connection. Given the Proposed Development was not brought forward on the Scopwick Heath site and that the identified Order Limits do not contain any land designated as BMV Grade 1 or 2, the Applicant has demonstrated that impacts on BMV agricultural land have been minimised and BMV itself has been appropriately considered in the site selection process. The design of the Proposed Development has sought to minimise impacts upon BMV agricultural land as explained in the Design Approach Document **[APP-186]** which sets out the design vision and principles that were developed at an early stage to provide a framework for design evolution. Design Principle 2 (as detailed in Section 3.9 of the Design Approach Document **[APP-186]**) relates to being sensitive to existing agricultural land and reducing development on BMV land. This has been achieved through the significant amount of retained arable land within the Order Limits (the DCO commits to 181 ha (447.3 acres) of retained arable land as secured by the Framework LEMP **[AS-122]**, a detailed version of which is to be provided, substantially in accordance with the Framework LEMP, as secured under Requirement 8 of Schedule 2 to the Draft DCO **[REP1-007]**). This retained arable land affords ecological and economic benefits associated with nesting birds habitat and retained jobs, but it should be noted that this retained arable land covers a significant proportion (approximately 116 ha (287 acres)) of subgrade 3a BMV land.
REP1-082	Site Selection	A thousand hectares was said to be required, but our calculations show an overplanting of 1.6 times as many panels as needed for 240MW planned. Smaller or non-continuous land areas would also achieve the same output, so the limiting stipulation of 1,000ha is not justified by the applicant but instead this arbitrary criteria limits the search to greenfield farmland, contrary to EN3. Using commercial roofs of industrial sites would require less infrastructure and more on-site use, by far the most intrinsically cost-effective were the feed-in tariffs on an equal footing. Commercial roofs are omitted from site selection in 2.5 Chapter 4, Para 4.2.11 (APP-029).	With regards to the scale of the Proposed Development, as set out in Section 3.4 of Appendix A: Site Selection Report of the Planning Statement **[AS-098]** a site of approximately 1,000 hectares (the equivalent to 2,471 acres) was deemed to be required, taking into account the necessary solar infrastructure to support the 240MW grid connection offer, the need for land to provide environmental mitigation and in order to retain flexibility. Appendix A: Site Selection Report of the Planning Statement **[AS-098]** sets out how previously developed land was considered for siting the Proposed Development. The brownfield land registers were consulted for land within the

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			boundaries of NKDC, South Kesteven District Council, East Lindsey District Council, West Lindsey District Council and the City of Lincoln Council, which all fell into the area of search. Three sites over 1 hectare (2.47 acres) were identified, however none of the sites were large enough to provide a viable land parcel of at least 40ha (99 acres). The Applicant identified 40ha (99 acres) as this is the size that would constitute one circuit at the chosen Medium Voltage of 33kV for the Proposed Development which would avoid the need for splitting circuits between smaller parcels as this would result in a higher environmental impact due to the need for more interconnecting cables, as well as avoiding the need for more third party land. Therefore, no individual brownfield site from the brownfield land registers provided an adequate area to facilitate a large-scale solar project over 50MW. Furthermore, 2 of the 3 sites had planning permission for residential development or for residential/mixed use development. In addition, the potential alternative site at Hawdin's Wood included areas of the former RAF Swinderby airfield, which closed in 1993. However given the site has been developed for a range of uses, including a logistics compound and the extraction of sand and gravel, as set out in paragraph 4.4.5 and 4.4.6 of Appendix A: Site Selection Report of the Planning Statement **[AS-098]**, it was not available for the purposes of the Proposed Development. As detailed in the Statement of Need **[APP-184]**, the Applicant recognises that energy alternatives such as decentralised energy generation on roof tops or brownfield land, for example, have an important role to play in decarbonisation. However, on its own, smaller scale solar, including solar on brownfield land, is not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. The Government's view is that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (EN-1(2024) Para 3.3.20. Further, that solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation. They can be built quickly and, large-scale solar is now viable in some cases to deploy subsidy-free (EN-3(2024), Para 2.10.13-14). As such, solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector and has an important role in delivering the government's goals for greater energy independence (EN-3 Para 2.10.9-10) as well as protecting consumers from volatile prices and reducing the risk of physical interruptions to supply that might impact on essential services (EN-1(2024) Para 3.3.2). Whilst brownfield solar and other smaller scale energy schemes are likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Proposed Development, in line with the overarching need established in NPS EN-1 and the technology-specific policy support for renewable energy infrastructure set out in NPS EN-3. Paragraph 2.10.29 of the NPS for renewable energy infrastructure (NPS EN-3) states that while land type should not be a predominating factor in determining the suitability of the site location, preference should be given to using brownfield and non-agricultural land. As set out above, these land types were identified within the area of search by checking the local authority brownfield register and

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			drawing on local knowledge. No suitable areas of brownfield or non-agricultural land at the appropriate scale were found within a viable search area of the point of connection at the proposed National Grid Substation near Navenby.
REP1-082	Site Selection	Even within this District, sites that should have been considered are the industrial areas in North Hykeham, where we have the energy from waste plant, Sleaford, or Newark or disused airfields. Closer to where the energy is needed opens many other options. The ES Non technical Summary (APP-180) Para 4.1.2 c states "*The Applicant sought to avoid urban areas*," thus excluding areas where the energy is needed and brown-field sites, and increasing the burden of infrastructure and environmental impact. This is contrary to NPS EN3 Para 2.10.11, which states that 'The Powering Up Britain: Energy Security Plan states that "*Government seeks large scale ground-mounted solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land*."	The Applicant recognises that the use of brownfield land (alongside other locations for solar development), has an important role to play in decarbonisation. However, on their own, smaller scale solar schemes, including on brownfield land, are not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. The Government recognises in the overarching NPS for Energy (NPS EN-1) that growth in large-scale solar schemes, alongside smaller schemes of solar or other renewable energy sources, is expected to improve the dependability of those assets as a combined portfolio, contributing to an adequate and dependable UK generation mix required to meet the UK's energy security needs, and the decarbonisation needs of the UK. Whilst brownfield solar and other smaller scale energy schemes are likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Proposed Development, in line with NPS EN-1. As set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**, opportunities for solar arrays on previously developed land (PDL) were considered and accordingly local authority brownfield land registers were consulted to identify the opportunities to utilise PDL. However, no individual brownfield site from the brownfield land registers provided an adequate area to facilitate a large-scale solar project over 50MW. Paragraph 2.10.11 of NPS EN-3 states *"The Powering Up Britain: Energy Security Plan states that government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement*." As set out in the Planning Statement **[AS-098]** paragraph 6.3.166, the Proposed Development allows for this shared use of land, in accordance with paragraph 2.10.11 of NPS EN-3, recognising the need to allow current farming practices to continue, as well as the critical national priority of solar generation. The Order Limits include areas of new grassland for bird mitigation and a significant portion of retained arable land (the Proposed Development commits to providing 181ha of retained arable land), which provides mitigation for ground nesting birds whilst also allowing current farming practices to continue. This retained arable land includes approximately 116ha of Subgrade 3a BMV land. Notwithstanding the above, NPS EN-1, NPS EN-3 and the WMS is clear that whilst development on land on lower grade agricultural land is preferred, it is not prohibited in the context of planning policy and the shared use of the land supports the provision of paragraph 2.10.11 of NPS EN-3.

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REP1-082	Sequential Test	There is insufficient evidence that a sequential test has been set, as described in EN3. Sites not available through voluntary commercial agreements, but that might be acquired via compulsory purchase have been omitted. The wider search area above the 15km radius from the imagined substation at Navenby do not appear to have been considered. The applicant's methodology also excludes sites that are not considered to be adjacent as increased cost would be likely and would impact viability. There are several other NSIP scale solar projects in Lincolnshire, some of which have had a DCO granted or are currently in examination, that are non-continuous, such as Cottam, West Burton, One Earth and Springwell. The applicant's assertion that the site must be continuous for viability is therefore questioned. As such there is considered to be insufficient information/evidence provided in the Fosse Green application to properly assert that a sequential approach has been taken with regard to site selection.	Appendix A: Site Selection Report of the Planning Statement **[AS-098]** sets out that the Applicant considered that 15km from the point of connection was a viable maximum distance for a project of this scale. This took into account the cost of the infrastructure and construction and the preference to limit the extent of environmental impacts and disruption which increase as the length of the cable corridor does. In relation to site size, as set out in paragraph 3.4.2 of Appendix A: Site Selection Report of the Planning Statement **[AS-098]** the Applicant's preference was to secure a large area of contiguous land to form a single development as this minimises cabling through third party land, which increases viability and deliverability of a project, and can also assist in reducing environmental impacts, such as reducing the extent of vegetation removal. Appendix A: Site Selection Report of this Planning Statement **[AS-098]** also sets out that the Applicant's preference was to deliver the Proposed Development on as few land parcels, with as few landowners, as possible, to ensure the deliverability of the Proposed Development. Section 3.6 of Appendix A: Site Selection Report of this Planning Statement **[AS-098]** describes how the availability of willing landowners is an important consideration in order to assemble a site that is deliverable and meet the policy requirements in relation to compulsory acquisition. The availability of willing landowners reduces and potentially avoids the need for Compulsory Acquisition powers to be used. It is noted that other solar NSIP schemes in Lincolnshire have combined smaller, non-contiguous sites, which is an equally valid approach, however this does not undermine the validity of the approach adopted by the Applicant in the case of the Proposed Development. NPS EN-1 recognises that there may be different approaches, stating at paragraph 4.3.22, in relation to the Secretary of State's decision making *"the Secretary of State should subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives: … only alternatives that can meet the objectives of the proposed development need to be considered."* A full explanation of site selection is set out in Appendix A: Site Selection Report of this Planning Statement **[AS-098]**. The report concludes that the location of the Proposed Development comprises a suitable site taking into account planning and environmental constraints and operational considerations. In terms of applying the sequential test at a site level, all proposed buildings, compound areas, the Onsite Substation and BESS and the majority of the solar PV panels will be located in Flood Zone 1. This is in accordance with Design Principle 6 set out in the Design Approach Document **[AS-098]**, which seeks to ensure that "The Proposed Development will be designed to be resilient to flood risk now and in the future, with close engagement with the Environment Agency." The location of solar infrastructure in relation to Design Principle 6 and the sequential test will be secured via the Design Commitments as set out in

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			Appendix A-1: Design Commitments of the Design Approach Document **[AS-098]**. Engagement with the Environment Agency will continue via a SoCG, which will be submitted at the midpoint of Examination in line with the Examining Authority's request in its Procedural Decision dated 22 August 2025 **[PD-005]**, that includes flood related matters. There are areas where Solar PV panels are located within Flood Zone 2 and the climate change extents of Flood Zone 3a. While there are areas of lower flood risk within the Principal Site, the need to balance areas for solar generation with the provision of environmental mitigation, such as the provision of land for bird mitigation in a dispersed nature in order not to create flocking, and the need to retain intervisibility between heritage assets has resulted in the need for solar PV panels to be located within areas of Flood Zone 2 and 3a, with no other reasonably available locations within the site itself. This is required in order for the Proposed Development to maximise the delivery of low-carbon renewable energy. The sequential test is therefore considered passed for the Principal Site due to flood risk from any source to be low following the embedded mitigation. Furthermore, Appendix 9-C: Flood Risk Assessment of the ES **[REP1-023]** sets out a comprehensive assessment of flood risk for the Proposed Development and concludes that the area of the Proposed Development remains safe for its lifetime and does not increase flood risk elsewhere. The Sequential Test is passed for the Principal Site due to flood risk from any source being assessed to be low following the embedded mitigation. Agricultural land has been carefully considered through the site selection process (as set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**) and also through the sensitive design of the Proposed Development in order to minimise the impact on BMV land and agricultural operations. Appendix A: Site Selection Report of the Planning Statement **[AS-098]** demonstrates how non BMV land was considered before BMV land was introduced into the area of search. The Applicant assessed the site against other potential alternative sites to ensure it was the most suitable, taking into account operational requirements, national and local planning policy and planning and environmental constraints, including the consideration of the loss of BMV agricultural land.
REP1-082	National Grid Substation near Navenby	Site visits were made on two days in June 2023, apparently to select one of seven sites for the substation, (NKDC Scoping report 25/0699/EIASCO) but the connection agreement for "the proposed National Grid substation near Navenby" was already agreed in November 2022. Paragraph 2.1.2 (APP-200) The selection process seems to have focussed on accommodating one landowning company and not a realistic effort to find the best site.	Application 25/0699/EIASCO does not relate to this application or Applicant. National Grid has undertaken its own site selection process to determine the location of the proposed National Grid substation near Navenby. Therefore, the Applicant cannot comment on this.
REP1-082	Scale of Proposed Development	The scale is much greater than anticipated by the Central Lincolnshire Local Plan. The rationale for the proposed development is based on the asserted necessity for largescale renewable energy schemes. Policy S14 of the Central Lincolnshire Local Plan has a presumption in favour proposals for ground based photovoltaics and associated infrastructure, including commercial large scale proposals, unless there is clear and demonstrable significant harm arising and/or the proposal is to take place on Best and Most Versatile (BMV) agricultural land . At the time of its preparation, "large scale" referred to projects covering several tens to 100–200 acres, such as Wellingore Four Winds Farm (approximately 4 acres) and Branston Potatoes (160 acres), both significant energy users. The present proposal, encompassing thousands of acres of farmland, far exceeds the scale originally envisaged and raises substantive questions regarding compliance with both the letter and spirit of local planning policy. "Large scale" is not defined in the Local Plan, finally	The Statement of Need **[APP-184]** describes how the Proposed Development is required to support the delivery of the UK's legally binding emissions reduction targets, while maintaining national security of supply, improving the overall affordability of the energy system, and providing value for money to end-use consumers. Paragraph 2.1.3 of NPS EN-1 is clear that *"To produce the energy required for the UK and ensure it can be transported to where it is needed, a significant amount of infrastructure is needed at both local and national scale…"* Policy S14 Renewable Energy of the Central Lincolnshire Local Plan sets out the commitment of the Central Lincolnshire Joint Strategic Planning Committee to supporting the transition to a net zero carbon future, seeking to maximise appropriately located renewable energy generated in Central Lincolnshire and recognising that such energy is likely to be wind and solar based.

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		adopted in April 2023, but certainly was not intended on this current scale of thousands of acres of farmland, with the significant impacts that result.	The Applicant has taken account of Policy S14 in Appendix C Local Policy Accordance Tables of the Planning Statement **[AS-098]** and has provided detailed commentary demonstrating how the Proposed Development is in compliance.
REP1-082	Cumulative Effects	The cumulative impact of the scale of the substation and three solar industrial proposals, each the size of a London Borough, makes an unacceptable impact on landscape character; visual amenity; heritage assets, their settings and the historic landscape; and impact of construction, each taking 2-2.5 years to construct and then adding maintenance and replacement.	The Applicant acknowledges that there is the potential for Cumulative Effects as a result of the combined impact of the Proposed Development to get er with other energy schemes proposed in the area and recognises local concerns regarding the concentration of energy developments in Lincolnshire. A detailed cumulative effects assessment has been provided in Chapter 15: Cumulative Effects and Interactions of the Environmental Statement **[APP-040]**. As summarised in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]** (ref. paragraph 15.5.24), significant adverse cumulative effects are identified on landscape and visual amenity receptors, however the significance of effect attributed to the Proposed Development alone is not increased when considering these other developments alongside the Proposed Development, as reported in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The following significant cumulative effects were established during construction, where the magnitude of effect is higher than that of the Proposed Development in isolation. During construction: Major Adverse (significant) landscape cumulative effects upon the North Kesteven District landscape sub-area Witham and Brant Vales due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction. Additionally, changes are anticipated to the visual amenity of users of the Viking Way (PRoW Cole/2/1 and BooG/2/2) as a result of the Proposed Development together with ID95 Application Reference: PL/0087/23, North Hykeham Relief Road, resulting in a Major adverse effect which is significant. Moderate Adverse (significant) landscape cumulative effects on the North Kesteven landscape sub-area Limestone Heath due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction as a result of the Proposed Development together with ID63 Application Reference: EN010149, Springwell Energy Farm and ID103 Application Reference: EN0110016, Leoda Solar Farm, resulting in a Moderate adverse effect which is significant. During operation (year 15) it is considered there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development. The potential for significant cumulative effects of other NSIP scale solar schemes has also been considered within Joint Interrelationship Reports prepared for the respective examinations of such schemes, including Springwell Solar Farm **[EN010149]**, which considered the Proposed Development with Leoda Solar Farm, and concluded no cumulative effects with the schemes addressed in the Tillbridge Solar Project **[EN010142]**, West Burton Solar Project **[EN010132]**, Gate Burton Energy Park **[EN010131]**, and Cottam Solar Project **[EN010133]** inter-relations report. These Reports found that, given the notable distances and lack of intervisibility between these schemes and the Proposed Development, there was no potential for significant cumulative effects. The Applicant acknowledges the concerns raised regarding the potential for disruption associated with construction. As set out in Chapter 3: The Proposed Development of the ES **[REP1-015]**, the construction phase for the Proposed

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			Development is temporary and is anticipated to take 24 months if multiple construction teams are mobilised simultaneously, or 30 months if the Proposed Development is built out sequentially. As summarised in Chapter 16: Summary of Environmental Effects of the ES **[APP-041]**, the Proposed Development will not result in significant residual adverse effects with regards to noise during construction. Table 3.7 of the Framework CEMP **[REP1-031]** commits to a construction noise monitoring plan to help ensure that the predicted levels are not exceeded in practice. The CEMP also contains measures to ensure residents are not impacted by significant levels of vibration. The provision of a detailed CEMP, which will be substantially in accordance with the framework plan, is secured via Requirement 12 of Schedule 2 to the Draft DCO **[REP1-007]**.
REP1-082	Aviation and Defence	The impacts are also unacceptable on aviation and defence navigation system and communications.	Engagement has been undertaken with key stakeholders including the Defence Infrastructure Organisation (DIO) and Ministry of Defence (MoD). The matters discussed specifically included the Glint and Glare Assessment of circuit patterns at RAF Waddington only. Section 14.3 of Chapter 14 Other Environmental Topics of the ES **[APP-039]** assesses the potential impact of the Proposed Development on glint and glare. RAF Waddington has been assessed in detail with the approach path into the two runways, the Air Traffic Control Tower and two circuit paths (east and west) being assessed for glint and glare impacts. Appendix 14-D: Glint and Glare Assessment of the ES **[AS-092 – AS-096]** concludes that the overall impacts on aviation assets, including RAF Waddington, are acceptable and not significant. Engagement with the MoD will continue through the examination process including via the preparation of a SoCG, which will be submitted at the midpoint of Examination in line with the Examining Authority's request in its Procedural Decision dated 22 August 2025 **[PD-005]**.
REP1-082	Impacts on Amenity	The impacts are unacceptable on the amenity of sensitive neighbouring uses (including local residents) by virtue of matters such as noise, dust, air quality and traffic.	The Proposed Development has been subject to an iterative design process to minimise impacts on local amenity. Embedded mitigation measures have been incorporated such as new planting, enhanced management of existing vegetation, and the introduction of offsets to reduce visibility of infrastructure from nearby settlements. These measures a e designed to reduce the visual dominance of the development and limit the contribution of the Proposed Development to cumulative impacts. The assessment of noise and vibration, presented in Chapter 11: Noise and Vibration of the ES **[APP-036]**, includes a series of robust, reasonable worst-case assumptions, such as driven piling and moderate downwind conditions. In particular, construction noise levels have been predicted under the assumption that all construction activity would be occurring simultaneously when in practice, given the size of the Proposed Development, activities in any given location will only occur for a fraction of the full construction schedule. As summarised in Chapter 16: Summary of Environmental Effects of the ES **[APP-041]**, the Proposed Development will not result in significant residual adverse effects with regards to noise (including noise from machinery and construction traffic) during construction, operation or decommissioning. Regarding noise associated with site traffic, changes in road traffic noise due to

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			construction traffic are identified as, at worst, minor and not significant (see paragraph 11.7.31 of Chapter 11: Noise and Vibration of the ES **[APP-036]**). Consideration has been given to traffic routing, timing, and access points to the Proposed Development to minimise noise impacts at existing receptors, as detailed in Chapter 13: Traffic and Transport of the ES **[APP-038]**. Management of Heavy Goods Vehicles (HGV) on the highway network will be managed through the Framework CTMP **[AS-102]** - the provision of a detailed CTMP, which will be substantially in accordance with the framework plan, is secured via Requirement 14 of the Draft DCO **[APP016]**. Appropriate routing of construction and decommissioning traffic on public roads and along access tracks will be pursuant to the detailed CTMP. With regards to vibration, Chapter 11: Noise and Vibration of the ES **[APP-036]** establishes that there is the potential for significant moderate adverse vibration effects on three sensitive receptors due to vibration from noise generating construction works if driven piling is undertaken at a distance of 60 m or closer to these properties, associated with construction of the BESS, Solar Stations, and ground mounted solar PV panel arrays, based on worst-case parameters. This is considered to be a precautionary approach to construction vibration and likely to overestimate vibration levels. If driven piling is to be undertaken, a commitment is included in the Framework CEMP **[REP1-031]** to undertake a construction vibration risk assessment such that significant effects would be avoided. If it is unavoidable that the relevant levels would be exceeded, the risk assessment would focus on limiting the exposure of nearby receptors to levels of vibration exceeding the relevant thresholds as far as reasonably practicable. Furthermore, the timing of any driven piling within 60m to residential receptors will be delayed until after 10am to avoid more sensitive time periods. Again, these significant effects would only occur for the short-term duration during which the driven piling works (if undertaken) are happening near to these residences. Management and mitigation measures have been included within the Framework CEMP **[REP1-031]** to minimise these impacts as far as practical. The provision of a detailed CEMP, which will be substantially in accordance with the framework plan, is secured via Requirement 12 of the Draft DCO **[REP1-007]**. Table 3.7 of the Framework CEMP **[REP1-031]** contains a commitment to provide a construction noise monitoring plan to help ensure that the predicted levels are not exceeded in practice. The Framework CEMP also contains measures to ensure residents are not impacted by significant levels of vibration. The Applicant acknowledges concerns regarding dust and emissions from vehicles and machinery during construction. These potential impacts have been assessed in Chapter 14.2: Air Quality of the ES **[APP-039]**. With embedded and additional mitigation measures, including best-practice dust controls and the use of Non-Road Mobile Machinery (NRMM) meeting or exceeding Regulation (EU) 2016/1628 standards, significant adverse effects on health or local air quality are not expected. All mitigation measures, including the development and implementation of a Dust Management Plan (DMP) as part of the detailed CEMP, are secured in the Framework CEMP **[REP1-031]** (ref. AQ-C1) and will be monitored throughout the construction phase. The DMP may

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			include monitoring of dust deposition, dust flux, real-time particulate matter continuous monitoring and/or visual inspections. A detailed CEMP will be produced, to be substantially in accordance with the framework plan, as secured under Requirement 12 of the Draft DCO **[REP1-007]**. When making a decision on the DCO Application, the Secretary of State will need to balance these potential non-significant impacts against the urgent need and critical national priority for the Proposed Development as set out in the energy NPSs.
REP1-082	Need for the Proposed Development	The need for the proposal is important to the weight to be attributed to its claimed benefits when set against identified harms. While low carbon generation can carry public benefit in principle, the practical value and deliverability of this scheme must be assessed realistically in light of current grid connection constraints. NESO's published connections reform results state that "*Batteries are significantly oversupplied*" and that "*There will be no capacity for batteries in the next window*." This position has been publicly described as a moratorium on new battery storage entering the next application window, but in any event the material planning point is that grid access for new battery storage is currently constrained and uncertain, and benefit claims that depend on timely connection or operation should be treated with caution unless evidenced." There is clearly no benefit in providing energy for thousands of homes, when they are already supplied from other renewable sources.	NPS EN-1 (designated January 2026) states that the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established (Paras 3.2.8 to 3.2.10). The NPSs include the government's conclusion that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms, because a combination of many or all types of such infrastructure is urgently required for both energy security and to achieve net zero (Paras 4.2.16 to 4.2.17). In 'Planning for New Energy Infrastructure Consultation Response' (the consultation on the new NPSs, available online at https://assets.publishing.service.gov.uk/media/69121170bda892e068aa6454/nps-revisions-2025-consultation-government-response.pdf), the Government states that: "Clean Power 2030 is a milestone that reflects the scale of ambition required to meet our Net Zero 2050 target; it is not a fixed ceiling on technology deployment or project approvals" (p8). Appendix A – Action Point 1 of the Applicant's Written Summaries of Oral Submissions Issue Specific Hearing 1 **[REP1-046]** provides further detail on what NESO are doing to manage the grid connection process regarding generating stations and batteries and supports the need for the Proposed Development.
REP1-082	Need for the Proposed Development	The National Energy System Operator (NESO), has published its connection reforms in January 2026, rationing grid access through permitted capacity and application windows, and that some technologies, particularly battery storage, are already materially oversubscribed. The benefits claimed for the proposed development should not be afforded full weight unless the Applicant can demonstrate a credible, timely, and deliverable connection pathway, supported by evidence rather than assumption. When the Government requirements are already superceded, as they currently are, then priority must be given to proposals where there is already an extant grid connection, and even better, a grid connection closer to where the energy is needed.	The Applicant refers to its response to the previous representation above. Further, the Proposed Development will connect to the National Electricity Transmission System (NETS), an existing national infrastructure asset which is designed specifically for the bulk transmission of energy from its point of generation to wherever energy is needed, both nationally and locally, through existing connections between the NETS and the local distribution grid.
REP1-082	Need for the Proposed Development	NESO has effectively issued a moratorium on battery storage following their battery storage report and the Government's Clean Power Action Plan, demonstrating that we are well over- supplied beyond 2035, by around three-fold, a fact also supported in correspondence from our Ministers. To quote; '*Batteries are significantly oversupplied, with around three times more projects than the permitted capacity. This is due to projects that have protections such as planning permission. There will be no capacity for batteries in the next window*.' This component should be assessed distinctly because it introduces a different impact and risk profile from the solar arrays. Given NESO's published position on oversubscription and the absence of capacity for batteries in the next window, the benefits	The Applicant refers to its response to the previous representation above. Further, the Applicant provided information to support its view that the BESS component of the Proposed Development would accord with the principles for associated development set out in paragraph 5 of the 'Guidance on associated development applications for major infrastructure projects' (Department for Communities and Local Government, April 2013) at Section 4.1 of the updated Planning Statement **[AS-098]**. Further information to support this view will be submitted in response to the Examining Authority's First Written Questions ref.

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		claimed for the BESS element should be afforded reduced weight unless the Applicant can evidence a deliverable connection pathway and a clear operational justification. In the absence of that evidence, the Examining Authority should treat the case for consenting the BESS within this DCO as unproven." hAPP-031 Para 6.4.76 states "*As the lifetime generation figure of the BESS is significantly less than that of the Proposed Development, it is reasonable to assume that the battery will only store and discharge energy generated by the Proposed Development*." Since they only operate for a few hours, the risks associated with the battery is not justified, as the BESS supply is more than needed.	GC 1.07(d) and as part of the Solar Technology Technical Guide submitted at Deadline 2.
REP1-082	Need for the Proposed Devleopment	The NESO Connections Reform Results demonstrate the need for solar is close to requirement for 2035, but it does not include solar on roofs. I have personally asked the Minister for Net Zero how much solar is from commercial and private roofs, and this is now published on the NESO site under "Solar photovoltaics deployed by capacity" "Table_1_by_capacity" and "Table_1_by_capacity_new". In November 2025 the UK cumulative Solar photovoltaic capacity was 21.481 GW, "of which domestic" is 6.273 GW, not in the ESO graph. NESO's Connections Reform Results demonstrate that the need for solar is also over capacity for 2030 and for 2035, significantly reducing the weight of benefit of this proposal. Over supply of electricity is a significant disbenefit, as "Constrain costs" were 1-5-1.8bn in 2024. Applications that can connect to an existing, built grid capacity should be prioritised with greater weight of benefit, and would save costs. NESO's "control allows a more strategic approach, including regional targets, rather than allowing a few landowners to dictate planning policy. The overall national need for renewable energy is already met, judging from the Solar Power Portal. The UK has around 96GW of offshore wind projects in development (Solar Power Portal) and 42.7GW of onshore wind. (Renewable UK) The UK Clean Power Plan 2030 is for 43-50 offshore wind, 27-29 GW onshore wind and 45-47GW solar, which could be acquired through rooftops, railways, motorways etc. Thus the calculated need for a total of 126GW already adequately met by wind alone, aside from our many rooftop solar developments, not yet counted. The proposed development does not meet the Government target of reduced emissions. From our calculations the emissions savings suggested by the applicant are incompatible with those from Springwell, conflicting and underestimated. Savings from this project have to be calculated against the renewable mix at the time. Thus, the estimates for savings over 60 years are 86% too high.	The Government's Clean Power 2030 Action Plan: Connections reform annex (updated) (available online at https://assets.publishing.service.gov.uk/media/67f3b417d3f1efd2ce2ab8a5/clean-power-2030-action-plan-connections-reform-annex-update.pdf) explains, at p8, that: "the capacity range only applies to projects which need to complete Transmission Impact Assessments (TIAs), subject to specific network operators' rules" and at p5 that "the lower threshold for TIA is 1 MW in England and Wales, 200 kW in mainland Scotland, and 50 kW in the Scottish Islands". The Government therefore explains, in footnote 10 on p9 of the same document, that "NESO engagement with Distribution Network Operators indicates that an additional 9-10 GW of rooftop solar projects, which are not subject to Transmission Impact Assessments (see page 5) could deploy before 2030. It is therefore possible that the 2030 Clean Power solar capacity range of 45-47 GW could yield around 54-57 GW in 2030 (subject to solar PV pipeline of rooftop solar projects." It is therefore clear that the Government, in establishing its capacity ranges, was fully aware of and accounted for existing and future potential for increases in low carbon technologies from schemes which were below the TIA threshold, including rooftop solar, as well as pipelines for schemes of all scales of other technologies. Appendix A – Action Point 1 of the Applicant's Written Summaries of Oral Representations **[REP1-046]** explains that NESO, working closely with other partners, introduced the Connections Reform program to remove unviable projects from the connections queue and prioritise those critical to delivering clean power and wider industrial decarbonisation, and that: (a) both the solar and BESS components of the Proposed Development have an agreement with NESO to connect to the NETS (b) NESO have confirmed that the Gate 2 connection date for the solar component of the Proposed Development will be in the second phase of prioritisation (Phase 2, between 2031 and 2035) but the exact date, has not yet been confirmed; and (c) NESO have confirmed that the BESS component of the Proposed Development will be offered a Gate 1 connection but the connection date has not yet been confirmed and will be 'indicative'. The Applicant clarified, in response to a question in ISH1, that the Proposed Development is included in NESO's Connection Reform Results and therefore is included with the total that NESO has prioritised for connection as part of the Connections Reform process. In relation to constraint costs, the Applicant notes that currently, the majority of constraint costs in GB occur when the electricity network linking the point of generation to the major points of consumption does not have the capacity to transmit all of the generation at certain times, but in particular when generation output is high. The Connections Reform process contributes to ensuring that

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			constraint costs do not escalate by prioritising connections in relation to planned grid upgrades. By connecting the Proposed Development to a part of the NETS which is geographically distant from areas of current constraint, and at a date prioritised by NESO, the anticipated generation is not expected to exacerbate any existing network constraints or cause any new ones. Further, the BESS proposed as associated development would enable the Proposed Development to provide its own operational flexibility to the electricity system which could include storing solar energy in the co-located batteries during periods of abundant solar supply, until it is needed. This would support the operation of the main solar array. The Proposed Development would be unlikely to receive a compensation payment from consumers for any electricity it has not generated.
REP1-082	Need for the Proposed Development	The need for the Fosse Green Energy proposal has reduced since other applications have now been passed or progressing further. To the South, Mallard Pass and to the East, Heckington Fen both have permission. There is a live application for 1,300 acres at Beacon Fen Energy Park Ltd for 400MW of power and 600MW of battery power on just 757ha, connecting to an expanded Bicker Fen substation. To the West, 3,000 acres of Tillbridge was granted permission by the Minister in October. Also to the West, lies the Great North Road Solar Park planned to cover some 4 to 7,000 acres. To the East three Springwell applications are with the Inspectorate for final decision. A list of the area now covered could be obtained from the District Council, to include ground mounted solar developments of less than 50MW. I understand they have a long and shortlist, but it is the long list that we will experience locally, and the one that needs to be considered, including construction, repair and decommissioning.	The Statement of Need **[APP-184]** provides evidence of the urgent need for an unprecedented capacity of new low carbon generation schemes to achieve the Government's Clean Power target (Para 5.4.1) on the way to achieving Net Zero by 2050. Appendix A – Action Point 1 of the Applicant's Written Summaries of Oral Submissions Issue Specific Hearing 1 **[REP1-046]** provides further detail on what NESO are doing to manage the grid connection process re: generating stations and batteries and supports the need for the Proposed Development. NESO's Connection Reforms process, the high-level results of which were published by NESO in December 2025, prioritised all schemes with grid connections according to a consistent methodology. The schemes listed in this representation have therefore been accounted for appropriately within NESO's prioritisation and their progression through the development process therefore does not reduce the need for the Proposed Development, which has also been prioritised by NESO for connection as part of the same process.
REP1-082	Cumulative Landscape Impacts	The direct and cumulative impacts on landscape character are wholly unacceptable. Lincolnshire has an agricultural foundation resulting in many isolated dwellings, hamlets and villages, set in food-producing countryside. With each of these applications, people might easily travel east-west along these routes, through miles of Solar industry, with never more than fifteen minutes break in views of the oppressive industry. There are 35,000 acres or 141 square kilometres of solar, including solar developments to the East, readily viewed from the high ground of the Cliff Villages, such as Navenby. The alien features of glass or silicon and steel draw the eye and create a different, industrialised character to the landscape, both on the heath and looking out from the heath. Concrete and cables give it a permanence, making the ground very difficult to return to crops, should our grandchildren ever get the chance. A working lifetime is hardly "temporary" and the additional 50% from 40 to 60 years is not adequately justified. The District Council consultant explains that the applicant "fails to acknowledge in their impact assessment that solar arrays and other energy projects such as BESS, lighting, overhead lines and pylons, and associated sub stations and converter stations are, together, likely to significantly impact on the existing landscape character over an extensive area across the published character areas… This would require changes to the national, regional and local character assessments." The landscape of pleasant villages set in attractive countryside, would change to a landscape dominated by industrial solar, and all that could follow in an industrial landscape. The District Council consultant also explains that the landscape character of the local, and potentially regional area, may be "completely altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that historically and currently is predominantly agricultural". 51% of the parish of Thorpe on the	The Applicant acknowledges the concern regarding the cumulative impact of the Proposed Development on the Lincolnshire countryside and local amenity. A detailed Cumulative Effects Assessment has been undertaken and is presented in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. The short list of cumulative developments, inclusive of the relevant solar proposals in the area, has been agreed with NKDC and LCC and is provided in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]** includes an assessment of cumulative impacts between the Proposed Development and other proposed projects and land allocations. This includes consideration of the Proposed Development in-combination with Springwell Energy Farm (ID 63), Leoda Solar Farm (ID 103), Brant Energy Storage Scheme (ID 108 – it is assumed this is the Coleby BESS referred to in the comment), Navenby BESS (ID 86), Gorse Hill BESS (ID 101), and the proposed National Grid substation near Navenby (ID 105). It should be noted that the Branston and Heckington Fen Solar Farm schemes referenced in the comment were not considered in the Cumulative Effects assessment due to the schemes being located outside of the 10km search area used to establish the Long List of other developments for the Cumulative Effects Assessment submitted with the DCO application (Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**).

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		Hill and a quarter of the parishes of Bassingham and Aubourn and Haddington will be covered by the Fosse Green Energy proposal. The cumulative impact on these villages is devasting to their character and setting.	The Proposed Development has been subject to an iterative design process to minimise impacts on local amenity. Embedded mitigation measures have been incorporated into the design of the Proposed Development such as new planting, enhanced management of existing vegetation, and the introduction of offsets to reduce visibility of infrastructure from nearby settlements. These measures are designed to reduce the visual dominance of the development and limit the contribution of the Proposed Development to cumulative impacts. Regarding the cumulative landscape and visual impact, as summarised in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]** (ref. paragraph 15.5.24), significant adverse cumulative effects are identified on landscape and visual amenity receptors, however the significance of effect attributed to the Proposed Development alone is not increased when considering these other developments alongside the Proposed Development, as reported in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The following significant cumulative effects were established during construction, where the magnitude of effect is higher than that of the Proposed Development in isolation. During construction: • Major Adverse (significant) landscape cumulative effects upon the North Kesteven District landscape sub-area Witham and Brant Vales due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction. Additionally, changes are anticipated to the visual amenity of users of the Viking Way (PRoW Cole/2/1 and BooG/2/2 – see Figure 2-2 Public Rights of Way Plan of the ES **[AS-020]** for the location of these PRoW) as a result of the Proposed Development together with ID95 Application Reference: PL/0087/23, North Hykeham Relief Road(as per Chapter 15: Cumulative Effects and Interactions of the ES **[APP040]**), resulting in a Major adverse effect which is significant. • Moderate Adverse (significant) landscape cumulative effects on the North Kesteven landscape sub-area Limestone Heath due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction as a result of the Proposed Development together with ID63 Application Reference: EN010149 (as per Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**), Springwell Energy Farm and ID103 Application Reference: EN0110016 (as per Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**), Leoda Solar Farm, resulting in a Moderate adverse effect which is significant. During operation (year 15) it is considered there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development and other solar NSIPs in the vicinity. The potential for significant cumulative landscape and visual effects of other NSIP scale solar schemes at greater distances from the Proposed Development has also been considered within Joint Interrelationship Reports prepared for the respective examinations of such schemes including, Springwell Solar Farm **[EN010149]**, which considered the Proposed Development and Leoda Solar Farm, and concluded no cumulative effects with the inter-relations report covering Tillbridge Solar Project **[EN010142]**, Gate Burton Energy Park **[EN010131]** West Burton **[EN010132]**, and Cottam

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			[EN010133]. These Reports found that, given the notable distances and lack of intervisibility between these schemes and the Proposed Development, there was no potential for significant cumulative effects. Regarding the cumulative impact on food production in Lincolnshire, considering the Proposed Development in isolation, it should be noted that the agricultural land required temporarily for construction and operation constitutes 0.09% of the total farmland in the East Midlands, and therefore constitutes a very small proportion of the regional agricultural resource and is unlikely to result in an impact upon food production. Furthermore, approximately 50% of the land within the Principal Site is currently used for the cultivation of non-food crops. Of this, the majority (approximately 81%) is grown for use as fuels for carbon-intensive energy sources, rather than for direct human or animal consumption. As such, while the land is agricultural in character, its current use does not solely support food production. When considering the Proposed Development cumulatively, it should be noted that this has been considered in the context of the Proposed Development in combination with relevant cumulative schemes Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** with regards to the cumulative loss of agricultural land. The cumulative effects assessment considers all solar NSIPs within the County of Lincolnshire and presents the best available information on BMV land take for each solar NSIP. The cumulative assessment concludes (ref. paragraph 12.10.17) the effect on agricultural land, including BMV, across the County is likely to remain minimal, as it comprises only a small fraction of agricultural land. Therefore, the cumulative effect on agricultural land associated with the Proposed Development in combination with relevant cumulative schemes remains not significant when considered at the County level. While the Proposed Development comprises infrastructure for solar energy generation and associated development (such as BESS), the land is not permanently changed to industrial use in land use planning terms, and it should be noted that the Proposed Development also includes a significant amount of retained arable land (a minimum of 181ha (447.3 acres) of retained arable land is secured via the Framework LEMP **[AS-122]**, a detailed version of which is to be developed substantially in accordance with the Framework LEMP, as secured under Requirement 8 of the Draft DCO **[REP1-007]**). The Applicant considers that significant landscape and visual effects would predominantly be in the short to medium term during construction and the early years of operation. For example, there are no significant long term visual effects anticipated on residents of local villages as, by year 15 of operation, the proposed landscaping would have matured such that views of solar PV infrastructure within the Site would be screened. As set out in the Framework LEMP **[AS-122]** (ref. paragraph 4.1.4), the overall goal of the landscape strategy is to integrate the Proposed Development into its surrounding landscape and to avoid or minimise adverse landscape and visual effects as much as possible. This has been achieved (for example) through the targeted planting of hedgerows, as illustrated in the Landscape Mitigation Plan, presented in Appendix A of the Framework LEMP **[AS-122]**, or the appropriate management of hedgerows to screen views (ref. paragraph 5.3.14). The reference to temporary is correct in planning terms as although the infrastructure will remain for 60 years, it will be removed at decommissioning in line with the measures set out in the Framework DEMP **[REP1-035]**, a detailed version of which is to be developed, substantially in accordance with the

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			framework plan, as secured under Requirement 20 of Schedule 2 of the Draft DO **[REP1-007]**. The non-permanent and reversible nature of a solar NSIP with 60 year consent has also been acknowledged in the Secretary of State's decisions on a number of solar NSIPs, such as Tillbridge Solar Farm, Mallard Pass Solar Project, West Burton and Gate Burton Energy Parks, which have all been granted consent. Under Requirement 20 of the Draft DCO **[REP1-007]**, decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational life of the Proposed Development, the substation will be decommissioned and the land will be available for its current use, although the landowners would choose how the land is to be used and managed.
REP1-082	Replacement of Infrastructure	In the ES Chapter 5 Environmental Impact Assessment Methodology (APP-030) that over the 60 year extended 'temporary' operational phase there would be periodic replacement of development components, and the design life of key equipment is provided in Table 3-11. As the panels are likely to be replaced on numerous occasions, additional information is required to assess the impacts of what might, in effect, be more than a single construction stage, but rather a series of re-construction periods, potentially involving large-scale equipment.	During the operational phase of the Proposed Development, any disruption resulting from replacement or repairs would be minimal – as stated in Chapter 3: The Proposed Development of the ES **[REP1-015]** (ref. Section 3.5), activity on the Principal Site will be limited and would be restricted principally to vegetation management, equipment maintenance and servicing, periodic replacement of components, periodic fence inspection, and monitoring to ensure the continued effective operation of the Proposed Development. It is anticipated that maintenance and servicing would include the inspection and, if required, renewal and removal, reconstruction, refurbishment or replacement of faulty or broken equipment, but not the removal, reconstruction or replacement of the whole of Work No. 1 (as defined in Schedule 1 of the Draft DCO **[APP016]**) at the same time. Maintenance activity would be phased and would therefore be considerably less intensive than during construction. The Framework OEMP **[REP1-033]** secures mitigation and management measures to be implemented during the operational phase of the Proposed Development to minimise disruption, for example (ref. NV-O1) modelling will be undertaken at the detailed design phase to confirm the noise levels at sensitive receptors will be no higher than the levels presented within the table at NV-O1. The provision of a detailed OEMP, which is to be substantially in accordance with the framework plan, is secured via Requirement 13 of the Draft DCO **[REP1-007]**.
REP1-082	Visual impact on Recreational Receptors	The significant visual impact on recreational receptors is also indicated in the closing of part or all of 36 footpaths during construction and the temporary creation of a few permissive paths, which would be through a closed in hedged corridor instead of uplifting open views - and they can be closed at any time. The Viking Way is a significant walk overlooking the lower land. Our villages and paths currently focus on the attractive views over twelve miles to the Trent Valley and on to the hills of Nottingham and Derbyshire. It is impossible to shield the structures from above and the barriers would diminish the open views. The visual impact of concrete, fencing and panels is far greater than the footprint, as it the eye is drawn to the shining alien features in the landscape, entirely spoiling the experience of human connection with the natural world.	Visual impacts on the PRoW network have been considered in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The siting of solar PV panels and associated infrastructure seeks to minimise instances of any elements of the Proposed Development being located on both sides of any PRoW. Where the provision of solar PV panels or associated infrastructure is proposed adjacent to a PRoW, an offset of a minimum of 10m either side of the centre line has been incorporated. Where the provision of solar PV panels or associated infrastructure is proposed on both sides of a PRoW, sections of wider offsets have also been integrated to avoid a 'canyon effect' and vary the extent of views experienced across the Principal Site where practicable. This is secured as a Design Commitment set out in Appendix A: Design Commitments of the Design Approach Document **[APP-186]** which are secured under Requirement 6 (detailed design approval) of Schedule 2 of the Draft DCO **[REP1-007]**.
REP1-082	Cumulative Landscape Impact	The cumulative impacts on the landscape within the relevant assessment area, including in relation to the proposed Navenby substation and other energy infrastructure proposals, must be assessed comprehensively and transparently. Where connection assumptions depend on infrastructure that is not yet consented or constructed, that uncertainty is directly relevant to deliverability and to the robustness of cumulative assessment. In those	As detailed in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]** and in accordance with Schedule 4, paragraph 5 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 'Cumulative Effects' associated with the Proposed Development, as relevant, have been considered within the ES. All of the submitted documentation that supports the

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		circumstances, the public benefit claimed for the scheme should not be afforded full weight unless the Applicant can evidence a credible and deliverable connection pathway and demonstrate that the cumulative assessment captures the realistic scale and interaction of relevant proposals. In addition, given the stated 60 year operational period and periodic component replacement, the examination must be satisfied that construction, replacement and maintenance effects have been assessed in a way that remains accurate across the lifetime of the development.”.	Applicant’s DCO Application for the Proposed Development is publicly available on the PINS website. There is no standard methodology for assessing Cumulative Effects and Effect Interactions. Therefore, a combination of professional judgement and established guidance has been used to inform the scope of the assessment and to assist with the identification of relevant developments to be included within the assessment. The current guidance includes The Planning Inspectorate’s guidance Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment which was published in September 2024. It should also be noted that the short list of cumulative developments has been agreed with NKDC and LCC. The Grid Connection Statement **[APP-200]** confirms that the Applicant has secured a connection to the proposed National Grid substation near Navenby. Whilst the Proposed Development will connect into the Navenby substation, which does not yet have planning consent and has not been constructed, this is not a barrier to the granting of development consent if there are no obvious reasons for the other application not to be granted consent. For example, paragraph 4.11.8 of NPS EN-1 sets out that *“on some occasions it may not be possible to coordinate applications. For example, different elements of a project may have different lead-in times and be undertaken by different legal entities subject to different commercial and regulatory frameworks (for example grid companies operate within OFGEM controls) making it inefficient from a delivery perspective to submit one application. Applicants may therefore decide to submit separate applications for each element. Where this is the case, the applicant should include information on the other elements and explain the reasons for the separate application confirming that there are no obvious reasons for why other elements are likely to be refused”.* As stated, the proposed National Grid substation near Navenby does not form part of this Application. A planning application for the proposed National Grid substation near Navenby will be submitted to NKDC by National Grid and will be determined in accordance with the Town and Country Planning Act 1990. Given the generally supportive national and local policy position, and on the basis that National Grid Electricity Transmission (NGET) take a responsible approach to siting, design and mitigation, in compliance with the ‘Horlock Rules’, there are no obvious reasons known to the Applicant why planning permission for the Navenby substation and associated overhead lines to connect it into the national grid would not be granted. NGET has stated to the Applicant that should consent not be granted the fall back is to appeal any such refusal to the Secretary of State by way of the Planning Inspectorate and await determination.
REP1-082	Need for the Proposed Development	The need is already fulfilled using applications with an extant grid capacity and connection. Covering an entirely agricultural area with solar, changing the nature of the landscape from rural to industrial solar is unnecessary. It is also soon outdated with more efficient and modern solar energy technology, so the replacements and maintenance will be important. There is a further application called “Navenby” but apparently connected to the “Trent”	With regards to the changing nature of the landscape, it is important to note that the Proposed Development would be temporary. The Applicant is seeking consent for a 60-year operational period. Under Requirement 20 of the Draft DCO **[REP1-007]**, decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational life, the land will be returned to the landowners and available for its existing use. Although it would be the decision of the landowners whether to return the land to its existing use, any material change of use would require planning permission.

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			It should be noted that the Order Limits include a significant portion of retained arable land (a minimum of 181ha (447.3 acres) of retained arable land is secured via the Framework LEMP **[AS-122]**, a detailed version of which is to be developed substantially in accordance with the framework plan, as secured under Requirement 8 of the Draft DCO **[REP1-007]**), which allows current farming practices to continue whilst also providing other benefits, such as mitigation for ground nesting birds. This retained arable land includes approximately 116ha (286.6 acres) of Subgrade 3a BMV agricultural land. The design of the Proposed Development and the DCO application has deliberately retained a degree of flexibility, for example in relation to the type and design of solar panels. This approach is typical for developments of this nature, as solar PV technologies continue to evolve and efficiencies are developed. Maintaining this flexibility ensures that the design is future-proofed and able to incorporate relevant technological advancements, such as more efficient solar panels, during the detailed design stage. The 60-year lifetime is considered appropriate for the Proposed Development and aligns with other consented solar projects, whereby the 60-year lifetime of the Proposed Development will provide urgently needed low-carbon renewable electricity and be a critical part of the national portfolio of renewable energy generation that is required to decarbonise its energy supply quickly and contribute to the transition to net zero. During the anticipated 60-year design life of the Proposed Development, it is expected that there will be requirement for the periodic replacement of some or all of the electrical infrastructure (details regarding the replacement of solar PV panels and BESS area within the Proposed Development is presented in Chapter 3: The Proposed Development **[REP1-015]** (ref. Section 3.5)). The ability to replace panels, where it is economical and practical to do so, part way through the lifetime of the Proposed Development allows for the implementation of any advancements in the technology to maximise the renewable generation onsite. The Applicant is not aware of another project called ‘Navenby’ connecting to ‘Trent’, but it is possible this is the original name on the NESO Transmission Entry Capacity (TEC) register for what is now known as the Leoda Solar project. This project has been incorporated into the Cumulative Impact Assessment in the ES (Chapter 15: Cumulative Effects and Interactions of the Environmental Statement **[APP-040]**).
REP1-082	Cumulative Impacts	The NESO TEC Register now shows 12 or 13 projects seeking connection to the non-existent substation at Navenby. The Inspector will want to have cognisance of the whole picture in considering the cumulative impacts on the character of the landscape and all other factors. Just three of the solar applications covers almost 10,000 acres, 37 square km, bigger than the whole of Lincoln City, and that houses over 100,000 people. Each is bigger than a London Borough. The impact on this area is very significant. The Parish of Thorpe on the Hill, for example is 47% covered in panels. Barriers created to hide the panels create unwanted barriers in themselves, closing in the open landscape. The application is below the cliff edge, so shielding from above is not practical, creating an industrial appearance to the landscape. Importantly, we currently have attractive historic villages set in rural countryside, but these vast areas of solar and the significant industrial developments, would change the whole nature of the landscape.	The Applicant acknowledges that there is the potential for Cumulative Effects as a result of the combined impact of the Proposed Development together with other energy schemes proposed in the area and recognises local concerns regarding the concentration of energy developments in Lincolnshire. A detailed cumulative effects assessment has been provided in Chapter 15: Cumulative Effects and Interactions of the Environmental Statement **[APP-040]**. As summarised in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]** (ref. paragraph 15.5.24), significant adverse cumulative effects are identified on landscape and visual amenity receptors, however the significance of effect attributed to the Proposed Development alone is not increased when considering these other developments alongside the Proposed Development, as reported in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The

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			following significant cumulative effects were established during construction, where the magnitude of effect is higher than that of the Proposed Development in isolation. During construction: Major Adverse (significant) landscape cumulative effects upon the North Kesteven District landscape sub-area Witham and Brant Vales due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction. Additionally, changes are anticipated to the visual amenity of users of the Viking Way (PRoW Cole/2/1 and BooG/2/2) as a result of the Proposed Development together with ID95 Application Reference: PL/0087/23, North Hykeham Relief Road, resulting in a major adverse effect which is significant. Moderate Adverse (significant) landscape cumulative effects on the North Kesteven landscape sub-area Limestone Heath due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction as a result of the Proposed Development together with ID63 Application Reference: EN010149, Springwell Energy Farm and ID103 Application Reference: EN0110016, Leoda Solar Farm, resulting in a Moderate adverse effect which is significant. During operation (year 15) it is considered there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development. The potential for significant cumulative effects of other NSIP scale solar schemes has also been considered within Joint Interrelationship Reports prepared for the respective examinations of such schemes, including, Springwell Solar Farm **[EN010149]**, Tillbridge Solar Project **[EN010142]**, West Burton **[EN010132]**, and Cottam **[EN010133]**. These Reports found that, given the notable distances and lack of intervisibility between these schemes and the Proposed Development, there was no potential for significant cumulative effects. With regards to the changing nature of the landscape, it is important to note that the Proposed Development would be temporary. The Applicant is seeking consent for a 60-year operational period. Under Requirement 20 of the Draft Development Consent Order **[REP1-007]**, decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational life, the land will be returned to the landowners and available for its existing use. Although it would be the decision of the landowners whether to return the land to its existing use, any material change of use would require planning permission. Changes to the design have been made in the vicinity of Thorpe on the Hill in response to feedback received from Thorpe on the Hill Parish Council and local residents during statutory consultation to reduce the impact of the Proposed Development, as set out in Table 4-2 of Chapter 4: Alternatives and Design Evolution of the ES **[APP-029]**. This has included the removal of solar PV within the field south-east of Thorpe on the Hill, which is now an area of managed arable fields for bird mitigation habitat purposes (i.e. no solar infrastructure proposed), to increase the distance from the village to the Proposed Development itself, and providing additional vegetation screening along Fosse Lane. As such, the Proposed Development design provides a 300m buffer between the proposed solar infrastructure and residential receptors in Thorpe on the Hill, which is secured via the Works Plans **[AS-105]**, in that under Requirement 6 of the Draft DCO **[REP1-007]**, the detailed design of the Proposed Development must be in accordance with the Works Plans. See Figure 3-2A of the ES **[AS-022]** and the Framework LEMP **[AS-122]** for details. The Design Approach Document **[APP-186]** provides

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			further details of all the design changes made in response to responses made to non-statutory and statutory consultation, the outcomes of environmental assessment and national and local planning policy. Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** concludes that the Proposed Development will have a moderate adverse (significant) impact during construction (in winter), reducing to a minor adverse (not significant) impact by Year 1 of operation (in winter), a minor adverse (not significant) impact by Year 15 of operation (in winter) and a negligible adverse (not significant) impact by Year 15 of operation (in summer) on the residents of Thorpe on the Hill. It is also noted that no barriers will be installed during the operation of the Proposed Development; screening will be delivered by vegetation planting.
REP1-082	BESS Safety	**Battery Energy Storage Systems (BESS) safety is a major concern** Government guidance on grid scale electrical energy storage systems has emphasised the need for robust safety governance, adherence to relevant standards, and clear incident management arrangements across the lifecycle of such development. The proposed distribution of BESS infrastructure across multiple compounds materially expands the development footprint and can intensify effects on landscape and land use. Critically, any assertions by the Applicant that incidents will not propagate between units or that contaminated firewater cannot reach watercourses must be supported by evidence and should not be treated as established fact. The examination should focus on whether the Draft DCO secures enforceable requirements covering fire prevention and response planning, containment of potentially contaminated firewater and runoff, monitoring, incident reporting, and ongoing operational controls	The safety of the population in the vicinity of the Proposed Development is of paramount importance and has been considered throughout the design of the Proposed Development, and in developing the mitigation secured by the various management plans submitted with the DCO Application. The UK Health and Security Agency have been consulted throughout the life cycle of the Proposed Development to date and further discussion will be considered and responded to as part of the Statement of Common Ground (SoCG), where the SoCG will be submitted at the midpoint of Examination in line with the Examining Authority's request in its Procedural Decision dated 22 August 2025 **[PD-005]**. The BESS layout has been developed in consultation with the LFRS and has taken account of guidance from the NFCC. Communication with the LFRS will continue through the detailed design and construction stages. It should be noted that a SoCG is currently under preparation with LCC which will include matters for the LFRS, including the BESS, and will be submitted at the midpoint of Examination, in line with the Examining Authority's request in its Procedural Decision dated 22 August 2025 **[PD-005]**. Regarding fire risk, the Applicant's Framework BSMP **[REP1-041]** was drafted to comprehensively address all key BESS safety requirements through failure prevention, monitoring / control systems, and hazard mitigation systems / protocols. Section 4.4.4 of the Framework BSMP stipulates that the ERP will follow NFCC guidance. They are specifically documented in the Framework BSMP **[REP1-041]** under the following sections: Section 1.3: Potential BESS Failure Section 1.4: Safety Objectives Section 1.5 Consultation with Lincolnshire Fire & Rescue Service (LFR) Section 1.6: Relevant Safety Guidance for the Scheme Section 2: BESS Safety Requirements Section 3: BESS Construction and Operation Requirements Section 4: Firefighting Requirements Section 5: Pre-construction Requirements secured through the DCO Section 5 documents how detailed design phase of the Proposed Development will consider the lifecycle of the battery system from installation to decommissioning. At the detailed design stage, risk assessment tools will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. These tools and reports will ensure that there are no significant off site impacts on the local community. Section 4.5 of the FBSMP documents how BESS fire pollution issues will be addressed (fire emissions and water pollution). Section 5.1.10 of the FBSMP stipulates that Emergency Response Plans (ERPs) covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in consultation LFRS and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not

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			significantly affect site operatives, first responders, and the local community. The provision of a detailed BSMP, which is to be substantially in accordance with the framework plan, is secured under Requirement 7 of the Draft DCO **[REP1-007]**. Control of firewater runoff is set out within Appendix 9-D Framework SWDS **[REP1-025]**. This states that swales will be lined with an impermeable membrane or similar to prevent any pollution associated with fire water runoff from entering the ground. Automatic penstock control valves will also be used in the event of a fire to prevent any pollution associated with fire water runoff from entering the local watercourses without prior testing. A detailed drainage strategy will be prepared, to be substantially in accordance with the framework, as secured by Requirement 10 of the Draft DCO **[REP1-007]**. These measures will ensure that there will be no significant effects arising from the potential contamination of surface water or groundwater. The Proposed Development includes embedded design mitigation and protection measures to reduce fire/explosion risk, which are detailed in the Framework BSMP **[REP1-041]**. These measures include an automatic cooling system which will be integrated into the BESS to stop or reduce battery cell thermal runaway propagation. The BESS is designed so that in the event one cell overheats/catches fire, there is sufficient distance between the cells to mitigate the risk of this spreading (to keep a fire isolated to a single cell (to the extent which it is possible to control this)). This layout has been developed in consultation with the LFRS and has taken account of guidance from the NFCC. Communication with the LFRS will continue through the detailed design and construction stages. The BESS is designed so that in the unlikely event one cell overheats or catches fire, there is sufficient distance between the cells to mitigate the risk of this spreading (to keep a fire isolated to a single cell (to the extent which it is possible to control this). There have been three (one during construction, two during operation) utility scale BESS fires in the UK to date, all of which were built prior to the current NFCC safety guidance. Further details are provided in the Applicant's Response to the Examining Authority's First Written Questions Appendix B: Response to ExA's Request for information on Historical BESS Fires.
REP1-082	Fire Safety and Contamination	Whether bunched together or spread we cannot accept the applicants' over-optimistic accident rate and statement that no fire will spread to adjacent units and no poisonous water will enter the water courses.	The Applicant emphasises that the safety risks of BESS are well known in 2026, whereby design requirements, standards and guidance have evolved in response to greater understanding. The Electric Power Research Institute (EPRI) BESS Failure Incident Database was established in 2021 as an information tool for both energy storage industry stakeholders and the public. Statistically, the significant global increase in BESS deployments means that there will be a likely increase in the number of failure events. However, global BESS failure rates dropped by 98% from 2018 to 2024 as lessons learned from BESS failure events have been incorporated into BESS design, testing requirements, control and monitoring systems, safety standards, and construction and operations best practices. EPRI, Insights from Battery Energy Storage Systems (BESS) Failure Incident Database: Analysis of Failure Root Cause, identified four primary root causes of BESS failure with the majority occurring in early lifecycle stages i.e. construction, commissioning, or within two years of operation. The Applicant emphasises that the EPRI research concluded that the primary cause of failure

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			was rarely the battery cells or modules, and the Framework BSMP **[REP1-041]** is drafted to address all key safety risk reduction topics to ensure that comprehensive BESS fire and explosion hazard prevention and mitigation strategies can be developed and implemented. The provision of a detailed BSMP, which will be substantially in accordance with the framework plan, is secured via Requirement 7 of the Draft DCO **[REP1-007]**. At the detailed design stage, the Applicant will only select a BESS system that, as mandated under NFPA 85536, must have undertaken Large Scale Fire Testing (LSFT) as part of UL 9540A tests (a standardised test method used to assess fire and explosion hazards associated with battery energy storage systems, including cell, module, unit, and installation-level testing) and / or 3rd party full scale destruction testing. This testing involves burning the full BESS system to validate safe equipment spacing and performance test active and passive mitigation systems integrated into the BESS design. The objective of the test is to evaluate the thermal exposure impacts from a developed BESS enclosure, to determine propagation risk to adjacent BESS or equipment. Testing also defines the length of burn, duration of Peak Heat Release Rate, maximum burn temperatures, etc. Regarding fire risk, the Applicant's Framework BSMP **[REP1-041]** was drafted to comprehensively address all key BESS safety requirements through failure prevention, monitoring / control systems, and hazard mitigation systems / protocols. Section 4.4.4 of the Framework BSMP stipulates that the ERP will follow NFCC guidance. Section 4.5 of the FBSMP documents how BESS fire pollution issues will be address ed (fire emissions and water pollution). Control of firewater runoff is set out within Appendix 9-D Framework SWDS **[REP1-025]**. This states that swales will be lined with an impermeable membrane or similar to prevent any pollution associated with fire water runoff from entering the ground. Automatic penstock control valves will also be used in the event of a fire to prevent any pollution associated with fire water runoff from entering the local watercourses without prior testing. A detailed drainage strategy will be prepared, to be substantially in accordance with the framework, as secured by Requirement 10 of the Draft DCO **[REP1-007]**. These measures will ensure that there will be no significant effects arising from the potential contamination of surface water or groundwater.
REP1-082	Safety	The question for this examination is not whether wider national regulations may evolve in future, but whether this DCO can secure an evidence based safety case through enforceable Requirements. The BESS element should be assessed distinctly from the solar arrays because it introduces a different risk profile and different control measures. If it is to be included within the DCO, the draft Order must contain clear, enforceable Requirements that secure its layout parameters, safety management framework, emergency planning, and environmental protection measures, rather than leaving critical safety controls to nonbinding commitments.	Regarding fire risk, the Applicant's Framework BSMP **[REP1-041]** was drafted to comprehensively address all key BESS safety requirements through failure prevention, monitoring / control systems, and hazard mitigation systems / protocols. Section 4.4.4 of the Framework BSMP stipulates that the ERP will follow NFCC guidance. They are specifically documented in the Framework BSMP **[REP1-041]** under the following sections: Section 1.3: Potential BESS Failure Section 1.4: Safety Objectives Section 1.5 Consultation with Lincolnshire Fire & Rescue Service (LFR) Section 1.6: Relevant Safety Guidance for the Scheme t Section 2: BESS Safety Requirements Section 3: BESS Construction and Operation Requirements

			Section 4: Firefighting Requirements Section 5: Pre-construction Requirements secured through the DCO Section 5 documents how detailed design phase of the Proposed Development will consider the lifecycle of the battery system from installation to decommissioning. At the detailed design stage, risk assessment tools will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. These tools and reports will ensure that there are no significant off site impacts on the local community. Section 4.5 of the FBSMP documents how BESS fire pollution issues will be addressed (fire emissions and water pollution). Section 5.1.10 of the FBSMP stipulates that Emergency Response Plans (ERPs) covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in consultation LFRS and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly affect site operatives, first responders, and the local community. The provision of a detailed BSMP, which is to be substantially in accordance with the framework plan, is secured under Requirement 7 of the Draft DCO **[REP1-007]**.
REP1-082	Impact on aviation receptors	Waddington is a key military base, one of the busiest in the UK Cranwell our RAF officer training site for the UK and Digby the RAF Intelligence unit. The locality is thus at a higher level of risk from foreign cyber-attacks, kill-switches either cutting off the power or creating burn-outs as found in panels elsewhere. The RAF have raised that solar installations are safe “when sensibly located, designed and orientated, pose any glint and glare flight safety issues for either military or civilian aviation”. What mitigations are there to reduce the possibility of an aircraft flying accident or an incident where the aircraft’s payload is inadvertently lost creating a major fire risk for the significant number of Battery Energy Storage Sites (BESS). Will a No-Fly Zone be established over these sites to prevent the possible catastrophic impact of an accident or an incident on the large number of containers containing lithium cells which make up a BESS and are susceptible to shock resulting from this type of accident or incident? The nearest BESS to the airfield is less than 3km from the threshold of Runway 02.	Flying ceased at RAF Digby in 1953 and therefore RAF Digby does not require assessment of Glint and Glare. RAF Cranwell is 14.91km away from the Principal Site as outlined in Appendix 14-D: Glint and Glare Assessment of the ES **[AS-092 – AS-096]**, which is outside the assessment buffer zone of 10km used for military airfields. Engagement has been undertaken with key stakeholders including the Defence Infrastructure Organisation (DIO) and Ministry of Defence (MoD). The matters discussed specifically included the Glint and Glare Assessment of circuit patterns at RAF Waddington only. Section 14.3 of Chapter 14 Other Environmental Topics of the ES **[APP-039]** assesses the potential impact of the Proposed Development on glint and glare. RAF Waddington has been assessed in detail with the approach path into the two runways, the Air Traffic Control Tower and two circuit paths (east and west) being assessed for glint and glare impacts. Appendix 14-D: Glint and Glare Assessment of the ES **[AS-092 – AS-096]** concludes that the overall impacts on aviation assets, including RAF Waddington, are acceptable and not significant. Engagement with the MoD will continue through the examination process including via the preparation of a SoCG, which will be submitted at the midpoint of Examination in line with the Examining Authority’s request in its Procedural Decision dated 22 August 2025 **[PD-005]**.
REP1-082	Cyber Security	Given the reliance of modern energy infrastructure on networked control systems and communications, the Applicant should evidence that appropriate and proportionate cyber security and operational resilience measures will be implemented, including governance, incident response, and supply chain assurance where relevant. Where legal duties apply under the Network and Information Systems Regulations 2018 or other applicable regimes, the examination should not rely on generic assurances but should require clear evidence of how risks will be managed across construction and operation.	The Applicant recognises the importance of cybersecurity and system resilience. The Proposed Development would operate within the UK’s regulated electricity system and comply with all applicable security, safety, and operational requirements. Matters relating to national security, cybersecurity standards, and supply chain governance are addressed through existing legislative and regulatory mechanisms. Should the Applicant receive consent, it would carry out a comprehensive audit to procure the required components of the Proposed Development. When doing so, the Applicant will treat the need to ensure an ethical supply chain with the utmost importance and is fully committed to the responsible and ethical procurement of

			all its equipment. The Applicant has proposed an ethical procurement policy within the Framework Employment, Skills and Supply Chain Plan (ESSCP). Under Requirement 19 of Schedule 2 of the Draft DCO, a detailed version of the ESSCP, substantially in accordance with the Framework ESSCP will be submitted to the relevant planning authority for approval. The ESSCP must be implemented as approved.
REP1-082	BESS Safety	The safety case for the BESS element must be evidenced in a way that is robust to plausible operational conditions, including concurrent emergency demands and potential failure modes. The Applicant should be required to demonstrate, with supporting evidence, that the proposed layout, separation, detection and suppression systems, and incident response arrangements are appropriate, including the management of potentially contaminated firewater and runoff. The examination should also test whether the local emergency response framework has been properly consulted and whether the Draft DCO secures enforceable Requirements for emergency planning, incident management, and ongoing operational controls, rather than relying on assumptions that adverse scenarios will not occur.”	The safety of the population of the population in the vicinity of the Proposed Development is of paramount importance and has been considered throughout the design of the Proposed Development, and in developing the mitigation secured by the various management plans submitted with the DCO Application. The UK Health and Security Agency have been consulted throughout the life cycle of the Proposed Development to date and further discussion will be considered and responded to as part of the Statement of Common Ground (SoCG), where the SoCG will be submitted at the midpoint of Examination in line with the Examining Authority’s request in its Procedural Decision dated 22 August 2025 **[PD-005]**. The BESS layout has been developed in consultation with the LFRS and has taken account of guidance from the NFCC. Communication with the LFRS will continue through the detailed design and construction stages. It should be noted that a SoCG is currently under preparation with LCC which will include matters for the LFRS, including the BESS, and will be submitted at the midpoint of Examination, in line with the Examining Authority’s request in its Procedural Decision dated 22 August 2025 **[PD-005]**. Regarding fire risk, the Applicant’s Framework BSMP **[REP1-041]** was drafted to comprehensively address all key BESS safety requirements through failure prevention, monitoring / control systems, and hazard mitigation systems / protocols. Section 4.4.4 of the Framework BSMP stipulates that the ERP will follow NFCC guidance. They are specifically documented in the Framework BSMP **[REP1-041]** under the following sections: Section 1.3: Potential BESS Failure Section 1.4: Safety Objectives Section 1.5 Consultation with Lincolnshire Fire & Rescue Service (LFR) Section 1.6: Relevant Safety Guidance for the Scheme Section 2: BESS Safety Requirements Section 3: BESS Construction and Operation Requirements Section 4: Firefighting Requirements Section 5: Pre-construction Requirements secured through the DCO. Section 5 documents how detailed design phase of the Proposed Development will consider the lifecycle of the battery system from installation to decommissioning. At the detailed design stage, risk assessment tools will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. These tools and reports will ensure that there are no significant off site impacts on the local community. Section 4.5 of the FBSMP documents how BESS fire pollution issues will be addressed (fire emissions and water pollution). Section 5.1.10 of the FBSMP stipulates that Emergency Response Plans (ERPs) covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in consultation LFRS and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly affect site operatives, first responders, and the local community. The provision of a detailed BSMP, which is to be substantially in accordance with the framework plan, is secured under Requirement 7 of the Draft DCO **[REP1-007]**.

			Control of firewater runoff is set out within Appendix 9-D Framework SWDS **[REP1-025]**. This states that swales will be lined with an impermeable membrane or similar to prevent any pollution associated with fire water runoff from entering the ground. Automatic penstock control valves will also be used in the event of a fire to prevent any pollution associated with fire water runoff from entering the local watercourses without prior testing. A detailed drainage strategy will be prepared, to be substantially in accordance with the framework, as secured by Requirement 10 of the Draft DCO **[REP1-007]**. These measures will ensure that there will be no significant effects arising from the potential contamination of surface water or groundwater. The Proposed Development includes embedded design mitigation and protection measures to reduce fire/explosion risk, which are detailed in the Framework BSMP **[REP1-041]**. These measures include an automatic cooling system which will be integrated into the BESS to stop or reduce battery cell thermal runaway propagation. The BESS is designed so that in the event one cell overheats/catches fire, there is sufficient distance between the cells to mitigate the risk of this spreading (to keep a fire isolated to a single cell (to the extent which it is possible to control this)). This layout has been developed in consultation with the LFRS and has taken account of guidance from the NFCC. Communication with the LFRS will continue through the detailed design and construction stages. There have been three (one during construction, two during operation) utility scale BESS fires in the UK to date, all of which were built prior to the current NFCC safety guidance. Further details are provided in the Applicant's Response to the Examining Authority's First Written Questions Appendix B: Response to ExA's Request for information on Historical BESS Fires.
REP1-082	Decommissioning and replacements	There needs to be a clear plan for recycling of old or damaged panels within 60 years as they are replaced and when the site is decommissioned, before any permissions are given. In Chapter 14 (APP-039), Table 14-22, the Applicant has assumed no waste on the assumption manufacturers in China will take responsibility. That assumption requires scrutiny against the UK's waste regulatory framework. Government guidance under the WEEE regime confirms that PV panels are electrical and electronic equipment and must be treated as such for reporting and end-of-life management purposes. The examination should require the Applicant to demonstrate a credible and enforceable waste and end of-life strategy for panels and associated equipment, including clear allocation of responsibility and funding, rather than relying on assumptions about overseas manufacturers	As detailed in the Framework CEMP **[REP1-031]** paragraph 2.8.1-4: *"The Principal Contractor will separate the main waste streams on-site, prior to transport to an approved, licensed third party waste management facility for recovery, recycling or disposal. A Site Waste Management Plan (SWMP) will be prepared by the Principal Contractor, which will provide a waste estimate and specify key responsibilities, reporting and auditing requirements and waste recovery targets. The SWMP will be finalised with specific measures to be implemented prior to the start of construction. All waste to be removed from the DCO Site will be undertaken by fully licensed waste carriers and taken to licensed waste facilities and managed in line with the requirements of the Waste (England and Wales) Regulations (2011) and the Hazardous Waste (England and Wales) Regulations (2005). The Proposed Development will apply the waste hierarchy, in priority order; prevention, preparation for reuse, recycled, other recovery and disposal*." The provision of a detailed CEMP, which is to be substantially in accordance with the Framework CEMP **[APP189]** is secured by Requirement 12 of Schedule 2 to the Draft DCO **[REP1-007]**. As outlined in Chapter 14 Other Environmental Topics of the ES **[APP-039]** Section 14.5 Materials and Waste, paragraph 14.5.88: *"The UK company SolRecycle reports a recovery rate of 95% for solar PV Panels".* As outlined in paragraph 14.5.91: *"It is assumed that specialist regional or national facilities would be in place at the time of component replacement and decommissioning, and these would be developed in response to demand generated by the UK wide*

solar PV panel industry and waste components would be reused, recycled, or recovered and not disposed of to landfill."

At present, solar PV panel waste generation is low, therefore there is a limited demand for facilities that recycle this infrastructure and there is therefore associated limited available capacity. It is a new, emerging market but the Applicant is aware of 5 UK facilities that currently recycle solar panels. These facilities report 95-99% recovery rates following recent investment, which is an improvement on what the market was achieving in the last few years. For example, Solar Recycling Solutions (SRS) states on its website that its London based recycling plant achieves a 99% material recovery rate currently. It is expected that the facilities which reuse, recycle, or recover end of-life solar PV panels will continue to expand (and new companies emerge) as the quantities of this waste stream increase.

The landfill tax strongly incentivises reuse, recycling and recovery, but critically the Waste Electrical and Electronic Equipment (WEEE) Regulations 2013 and the Waste Batteries and Accumulators (Amendment) Regulations 2009 place obligations on those who place solar PV panels and batteries on the market to finance the costs of collection, treatment, recovery and environmentally sound disposal, whilst also requiring a minimum 90% recovery rate. As noted above, it is expected that the current market would expand to improve this.

REP1-082	Cable Installation and Decommissioning	The examination must be satisfied that the impacts of cable installation are not treated as a single, one-off construction effect if maintenance, repair or replacement could require further intrusive works during the operational period. The Applicant should provide clear evidence on cable design life, fault repair scenarios, replacement triggers, and the likely scale of future works, and the Draft DCO should secure appropriate controls for such works, including land restoration and management of construction impacts. 8.6 It is not clear all these costs are included in the £340m calculated by the applicant. There is a risk of increased landfill with the added risks of pollution and fire. A significant bond would be needed to ensure money is available should the developer or site operator collapse. A suggested condition would be similar to that in the Helios Renewable Energy Project. In the Draft DCO, dated 27 May 2025, paragraph 5(3) of Schedule 2 states:- "No later than year 15 of operation the undertaker must notify the local planning authority that the undertaker has put in place the requisite decommissioning security in the form as required by the landowners". However, the bond needs to be front-loaded, because the cost burden of decommissioning is created at construction and new businesses most often fail in the early years. For example, a lump sum up front should be required, as in a highways bond.	During the operational phase of the Proposed Development, any disruption resulting from replacement or repairs would be minimal – as stated in Chapter 3: The Proposed Development of the ES **[REP1-015]** (ref. Section 3.5), activity on the Principal Site will be limited and would be restricted principally to vegetation management, equipment maintenance and servicing, periodic replacement of components, periodic fence inspection, and monitoring to ensure the continued effective operation of the Proposed Development. It is anticipated that maintenance and servicing would include the inspection and, if required, renewal and removal, reconstruction, refurbishment or replacement of faulty or broken equipment, but not the removal, reconstruction or replacement of the whole of Work No. 1 (as defined in Schedule 1 of the Draft DCO **[APP016]**) at the same time. Maintenance activity would be phased and would therefore be considerably less intensive than during construction. The Framework OEMP **[REP1-033]** secures mitigation and management measures to be implemented during the operational phase of the Proposed Development to minimise disruption, for example (ref. NV-O1) modelling will be undertaken at the detailed design phase to confirm the noise levels at sensitive receptors will be no higher than the levels presented within the table at NV-O1. The provision of a detailed OEMP, which is to be substantially in accordance with the framework plan, is secured via Requirement 13 of the Draft DCO **[REP1-007]**. The financial position of the Applicant and the proposed funding structure for the Proposed Development is detailed within the Funding Statement **[AS-014].** This document sets out the estimated current capital cost for the Proposed Development and the Proposed Development funding strategy, including confirmation that the Applicant has access to significant funds to implement the Proposed Development. The Applicant is applying for a 60-year operational period for the Proposed Development, which is secured under Requirement 20 of the Draft DCO **[REP1-**

			007], which provides that decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational lifetime of the Proposed Development, it will be decommissioned in line with the controls set out within the Framework DEMP **[REP1-035]** (the provision of a detailed DEMP, which is to be substantially in accordance with the framework plan, is secured under Requirement 20 of the Draft DCO **[REP1-007]**), with the land reinstated to its original quality, and returned to the landowners who would choose how the land is to be used and managed. It should be noted that this is a legally binding obligation to carry out decommissioning works, including the funding of the same, and that the breach of any commitments under a DCO amounts to a criminal offence, and the provisions and Requirements of a DCO are enforceable by the Local Planning Authority. If the Development Consent Order is granted, the Applicant will be subject to the Requirements contained within Schedule 2 of the Draft DCO **[REP1-007]**, which sets out the mechanisms by which the Proposed Development would be controlled. During the construction, operation and decommissioning of the Proposed Development, mitigation to minimise and avoid adverse impacts to the environment will be implemented in line with the Framework CEMP **[REP1-031]**, Framework OEMP **[REP1-033]** and Framework DEMP **[REP1-035]**. Furthermore, with regards to fire safety, the Framework BSMP **[REP1-041]** sets out design and mitigation measures to be implemented as part of the Proposed Development detailed design. The Applicant has consulted the NFCC guidelines and engaged with LFRS throughout the pre-application phase, whereby close consultation will continue with LFRS throughout the planning process. The provision of a detailed CEMP, OEMP, DEMP and BSMP, which are to be substantially in accordance with the framework plans, is secured under Requirements 12, 13, 20 and 7 of the Draft DCO **[REP1-007]** respectively. It should be noted that the breach of any commitments under a DCO amounts to a criminal offence and the provisions and Requirements of a DCO are enforceable by the Local Planning Authority.
REP1-082	Above ground inspection towers	Further, “underground cable faults often require extensive works, specialist resource, tools and equipment to locate the fault, followed by significant work to expose the damage, replace the damaged section and then up to an additional month to carry out necessary cable jointing and testing of new sections. The mobilisation of specialist equipment to undertake fault repairs on underground cabling results in significant local impacts, particularly for landowners and public highways. This presents significant risks to security of supply and network reliability.” At the joins every 400m, a wider bay is required (45m), with a permanent inspection tower in place. Those towers are not mentioned in the above ground visual intrusion of the cables, nor in the replacement and decommissioning.	During the operational phase of the Proposed Development, any disruption resulting from replacement or repairs would be minimal – as stated in Chapter 3: The Proposed Development of the ES **[REP1-015]** (ref. Section 3.5), activity on the Principal Site will be limited and would be restricted principally to vegetation management, equipment maintenance and servicing, periodic replacement of components, periodic fence inspection, and monitoring to ensure the continued effective operation of the Proposed Development. It is anticipated that maintenance and servicing would include the inspection and, if required, renewal and removal, reconstruction, refurbishment or replacement of faulty or broken equipment, but not the removal, reconstruction or replacement of the whole of Work No. 1 (as defined in Schedule 1 of the Draft DCO **[APP016]**) at the same time. Maintenance activity would be phased and would therefore be considerably less intensive than during construction. The Framework OEMP **[REP1-033]** secures mitigation and management measures to be implemented during the operational phase of the Proposed Development to minimise disruption, for example (ref. NV-O1) modelling will be undertaken at the detailed design phase to confirm the noise levels at sensitive receptors will be no higher than the levels presented within the table at NV-O1. The provision of a detailed OEMP, which is to be substantially in accordance with the framework plan, is secured via Requirement 13 of the Draft DCO **[REP1-007]**.

			Cable faults tend to be localised and underground cabling is typically pulled back through the sheathing to the relevant jointing bay, avoiding the need to dig down to expose the cabling. This can be done new cabling installed relatively quickly. Any inspection towers (e.g. cameras attached to metal structures) associated with the Proposed Development will be to allow workers to see into joint bays and are removed following the installation of this infrastructure.
REP1-082	Waste from solar infrastructure	The quantity of waste on 575,000 panels with latest research indicating a 20% failure rate over 10 years. The County Council Local Impact Report calculates about 15 million panels to be disposed of, using the applicant's figures, but with this latest research on failure rates, this is likely to be an underestimate. The Applicant's waste assessment should be revisited to ensure it reflects realistic rates of component replacement and failure over the operational lifetime, including panels, inverters and associated equipment. If specific failure rate assumptions are relied upon, they should be clearly sourced and the resulting waste quantities should be shown through a transparent calculation so that the examination can verify them. In the absence of such clarity, the examination should not accept the waste assessment as robust, and the Draft DCO should secure an enforceable end-of-life and decommissioning strategy, including funding and responsibility allocation, before construction proceeds."	As stated in the Framework DEMP **[REP1-035]** (ref MW-D1), the Proposed Development will aim to prioritise waste prevention, by preparing for reuse, recycling and recovery and lastly disposal to landfill as per the waste hierarchy. Furthermore, to reduce the potential impacts from materials and waste, and to achieve high levels of sustainability in The Proposed Development as a whole, the Principal Contractor will apply the principles of the waste hierarchy and adopt best practice measures which go beyond statutory compliance. This may include BPMs set out in construction industry guidance for example, guidance from the Considerate Constructors Scheme, Waste & Resources Action Programme and Construction Industry Research and Information Association. The provision of a detailed DEMP, which is to be substantially in accordance with the framework plan, is secured under Requirement 20 of the Draft DCO **[APP016]**. The anticipated waste streams during decommissioning are set out in Table 14-7 Estimated Decommissioning Waste within ES Chapter 14: Other Environmental Topics **[APP-039]**. With the embedded mitigation measures in place, the overall quantities of decommissioning waste to be disposed of to landfill are anticipated to be below 1% of regional inert and non-hazardous landfill capacity and less than 0.1% of national hazardous landfill capacity. The assessment concludes that significant waste effects are not expected during decommissioning of the Proposed Development. As outlined in Chapter 14 Other Environmental Topics of the ES **[APP-039]** Section 14.5 Materials and Waste, paragraph 14.5.88: *"The UK company SolRecycle reports a recovery rate of 95% for solar PV Panels".* As outlined in paragraph 14.5.91: *"It is assumed that specialist regional or national facilities would be in place at the time of component replacement and decommissioning, and these would be developed in response to demand generated by the UK-wide solar PV panel industry and waste components would be reused, recycled, or recovered and not disposed of to landfill.*" At present, solar PV panel waste generation is low, therefore there is a limited demand for facilities that recycle this infrastructure and there is therefore associated limited available capacity. It is a new, emerging market but the Applicant is aware of 5 UK facilities that currently recycle solar panels. These facilities report 95-99% recovery rates following recent investment, which is an improvement on what the market was achieving in the last few years. For example, Solar Recycling Solutions (SRS) states on its website that its London based recycling plant achieves a 99% material recovery rate currently. It is expected that the facilities which reuse, recycle, or recover end of-life solar PV panels will continue to expand (and new companies emerge) as the quantities of this waste stream increase. The landfill tax strongly incentivises reuse, recycling and recovery, but critically the Waste Electrical and Electronic Equipment (WEEE) Regulations 2013 and the Waste Batteries and Accumulators (Amendment) Regulations 2009 place obligations on those who place solar PV panels and batteries on the market to finance the costs of collection, treatment, recovery and environmentally sound disposal, whilst also requiring a minimum 90% recovery rate. As noted above, it is expected that the current market would expand to improve this. As detailed in the Framework CEMP **[REP1-031]**

			paragraph 2.8.1-4: *"The Principal Contractor will separate the main waste streams on-site, prior to transport to an approved, licensed third party waste management facility for recovery, recycling or disposal. A Site Waste Management Plan (SWMP) will be prepared by the Principal Contractor, which will provide a waste estimate and specify key responsibilities, reporting and auditing requirements and waste recovery targets. The SWMP will be finalised with specific measures to be implemented prior to the start of construction. All waste to be removed from the DCO Site will be undertaken by fully licensed waste carriers and taken to licensed waste facilities and managed in line with the requirements of the Waste (England and Wales) Regulations (2011) and the Hazardous Waste (England and Wales) Regulations (2005). The Proposed Development will apply the waste hierarchy, in priority order; prevention, preparation for reuse, recycled, other recovery and disposal*." The provision of a detailed CEMP, which is to be substantially in accordance with the Framework CEMP **[APP189]** is secured by Requirement 12 of Schedule 2 to the Draft DCO **[REP1-007]**.
REP1-082	Financial viability	**The financial viability of Fosse Green Energy needs to be questioned** The viability of the project relies on other applications also being successful to justify the new substation, which may not get permission anyway. Thus the other companies are also relevant. We have investigated these companies seeking permission and find them to have very little capital or staff. These empty shell companies are taking responsibility for vast, speculative developments with undeveloped safety regulations, especially regarding the battery installations. Significant bonds are needed should the public purse need to step in. These are not detailed in the application, but could be £100m or more.	The financial position of the Applicant and the proposed funding structure for the Proposed Development is detailed within the Funding Statement **[AS-014]**. This document sets out the estimated current capital cost for the Proposed Development and the Proposed Development funding strategy, including confirmation that Recurrent Energy has access to significant funds to implement the Proposed Development.
REP1-082		Local roads cannot cope with the increased HGV traffic 10.1 The narrow lanes and junctions are inadequate to accommodate the likely increase in traffic. All roads used by HGV's need to be wide enough for two HGV's to pass without breaking up the edge of the road. With the expected increase in traffic, passing places are inadequate. 10.2 Chapter 13 (App-038) Para 13.4.68) states "Where practicable, the Framework CTMP **[**EN01054/APP/7.18**]** will restrict HGVs to routes which avoid these villages …." However, having specifically stated in Para 13.4.67 that HGV trips will not pass through Haddington, Figure 13-4 shows HGVs being routed through the village, as well as Thurlby. 10.3 The scale and intensity of construction traffic associated with the Proposed Development raise serious questions about the suitability and resilience of the local road network. The examination should test whether the Applicant's construction traffic assumptions are realistic, whether worst case scenarios have been properly assessed, and whether the proposed mitigation measures are sufficient to prevent unacceptable impacts on highway safety and local amenity.	The potential effects of construction traffic on the environment and local road infrastructure have been appropriately assessed in Chapter 13: Traffic and Transport of the ES **[APP-038]**, following the relevant legislation and planning policy in Appendix 13-A **[APP-163]**. The assessment concludes that the Proposed Development is not expected to result in any significant effects upon traffic and transport receptors with the proposed embedded mitigation in place. This has included an assessment of the HGV routes identified in Figure 13-4 **[AS-072]**, which routes through Haddington and Thurlby. The assessment has used the shortest expected construction programme (24 months), which provides a worst-case scenario in terms of construction vehicle trips (a more condensed construction programme would result in a higher intensity of vehicle trips, the worst-case scenario would be the maximum trips per day) as this is based on a rapid, and so shorter, construction period that would generate the highest number of peak hour and daily road trips on the local network. In addition, LCC and National Highways in their capacity of being responsible for the local and strategic road networks, respectively, have deemed the impacts on the road networks to be acceptable in principle **[RR-157]** and **[RR-201]**. Measures to manage construction traffic, including site access, vehicle routing and staff travel are detailed in the Framework CTMP **[AS-102]**. The CTMP is designed to minimise potential disruption to the local highway network and potential environmental effects associated with construction traffic. Production of a detailed CTMP, to be developed into a detailed substantially in accordance with the Framework Plan, is secured under Requirement 14 of the Draft DCO **[REP1-007]**.

REP1-082	Economic benefits	**The impact on the agricultural economy has not been fully assessed** The economic benefits claimed for the proposal appear limited in scale and duration, with construction phase employment temporary and operational employment minimal. When assessed against the long term loss of agricultural land, changes to land use, and potential displacement effects, the net local economic benefit is uncertain and should be treated with caution in the overall planning balance.	The Applicant recognises that there are concerns relating to the potential for the Proposed Development to impact upon food production. As considered in Chapter 12: Socio-Economics and Land Use **[AS-016]**, the total land area required for the Proposed Development represents approximately 0.09% of the total farmland within the East Midlands, and therefore constitutes a very small proportion of the regional agricultural resource. Furthermore, research undertaken by the Applicant in 2024 indicates approximately 50% of the land within the proposed Principal Site is currently used for the cultivation of non-food crops. Of this, the majority (approximately 81%) is grown for use as fuels for carbon-intensive energy sources, rather than for direct human or animal consumption. As such, while the land is agricultural in character, its current use does not solely support food production. The Proposed Development would therefore result in a limited and proportionate change in land use, set against the wider regional context and the Proposed Development's contribution to cleaner energy generation. It should be noted that the Order Limits include a significant portion of retained arable land (a minimum of 181ha (447.3 acres) of retained arable land is secured via the Framework LEMP **[AS-122]**, a detailed version of which is to be developed substantially in accordance with the framework plan, as secured under Requirement 8 of the Draft DCO **[REP1-007]**), which allows current farming practices to continue whilst also providing other benefits, such as mitigation for ground nesting birds. This retained arable land includes approximately 116ha (286.6 acres) of Subgrade 3a BMV agricultural land. Following decommissioning, as set out in the Framework DEMP **[REP1-035]** (ref. paragraph 2.3.5), the land will be returned to the landowners and available for its current use, although it will be the decision of the landowners as to how they use and manage the land. The provision of a detailed DEMP, which is to be substantially in accordance with the framework plan, is secured via Requirement 20 of the Draft DCO **[REP1-007]**.
REP1-082	Loss of productive agricultural land	The Applicant's assessment does not demonstrate that the economic consequences of removing extensive areas of productive agricultural land from use for the duration of the operational period have been properly addressed. The examination should require a clear assessment of the potential effects on agricultural output, farm business resilience, and the wider local supply chain, including contractors, haulage, input suppliers, agronomy services and local processing. Where any quantified claims are relied upon, they should be supported by an auditable methodology and source material. In the absence of that evidence, the planning concern remains that long term land use change at this scale can materially affect the functioning of the local agricultural economy, and that those effects should be assessed and weighed transparently within the socio-economic case.	With regards to economic and other benefits of BMV land, Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** has considered this as part of the assessment undertaken, for example giving consideration to the existing jobs supported by the agricultural land. As noted in paragraph 12.7.52 of this chapter, it has been confirmed by all landowners that no job losses are expected as a result of the removal of agricultural land. It is expected that when the rent revenues from the land start, there will be additional jobs created on their farms offsite as landowners diversify their land further with the underlying financial stability of the rental income. The Applicant recognises that there are concerns relating to the potential for the Proposed Development to impact upon food production. As considered in Chapter 12: Socio-Economics and Land Use **[AS-016]**, the total land area required for the Proposed Development represents approximately 0.09% of the total farmland within the East Midlands, and therefore constitutes a very small proportion of the regional agricultural resource. Furthermore, research undertaken by the Applicant in 2024 indicates approximately 50% of the land within the proposed Principal Site is currently used for the cultivation of non-food crops. Of this, the majority (approximately 81%) is grown for use as fuels for carbon-intensive energy sources, rather than for direct human or animal consumption. As such, while the land is agricultural in character, its current use does not solely support food production. The Proposed Development would therefore result in a limited and proportionate change in land use, set against the wider regional context and the Proposed Development's contribution to cleaner energy generation. It should be noted that the Order Limits include a significant

			portion of retained arable land (a minimum of 181ha (447.3 acres) of retained arable land is secured via the Framework LEMP **[AS-122]**, a detailed version of which is to be developed substantially in accordance with the framework plan, as secured under Requirement 8 of the Draft DCO **[REP1-007]**), which allows current farming practices to continue whilst also providing other benefits, such as mitigation for ground nesting birds. This retained arable land includes approximately 116ha (286.6 acres) of Subgrade 3a BMV agricultural land. Following decommissioning, as set out in the Framework DEMP **[REP1-035]** (ref. paragraph 2.3.5), the land will be returned to the landowners and available for its current use, although it will be the decision of the landowners as to how they use and manage the land. The provision of a detailed DEMP, which is to be substantially in accordance with the framework plan, is secured via Requirement 20 of the Draft DCO **[REP1-007]**.
REP1-082	Loss of productive arable land	Every reduction in productive land, means less food available for eating or for export. Even if it is used for energy crops, land can be returned to food the following year, if that is what is wanted, or to woodland, wetland or ponds. Locking ourselves out of our best asset for sixty years, with contracts to global companies, is severely limiting to our local economy. The socio-economic impacts are clearly negative and reasonable grounds for an objection.	The Applicant recognises that there are concerns relating to the potential for the Proposed Development to impact upon food production. As considered in Chapter 12: Socio-Economics and Land Use **[AS-016]**, the total land area required for the Proposed Development represents approximately 0.09% of the total farmland within the East Midlands, and therefore constitutes a very small proportion of the regional agricultural resource. Furthermore, research undertaken by the Applicant in 2024 indicates approximately 50% of the land within the proposed Principal Site is currently used for the cultivation of non-food crops. Of this, the majority (approximately 81%) is grown for use as fuels for carbon-intensive energy sources, rather than for direct human or animal consumption. As such, while the land is agricultural in character, its current use does not solely support food production. The Proposed Development would therefore result in a limited and proportionate change in land use, set against the wider regional context and the Proposed Development's contribution to cleaner energy generation. It should be noted that the Order Limits include a significant portion of retained arable land (a minimum of 181ha (447.3 acres) of retained arable land is secured via the Framework LEMP **[AS-122]**, a detailed version of which is to be developed substantially in accordance with the framework plan, as secured under Requirement 8 of the Draft DCO **[REP1-007]**), which allows current farming practices to continue whilst also providing other benefits, such as mitigation for ground nesting birds. This retained arable land includes approximately 116ha (286.6 acres) of Subgrade 3a BMV agricultural land. Following decommissioning, as set out in the Framework DEMP **[REP1-035]** (ref. paragraph 2.3.5), the land will be returned to the landowners and available for its current use, although it will be the decision of the landowners as to how they use and manage the land. The provision of a detailed DEMP, which is to be substantially in accordance with the framework plan, is secured via Requirement 20 of the Draft DCO **[REP1-007]**.
REP1-082	Agriculture and Soils	The incremental loss of Best and most versatile (BMV) land to large infrastructure projects intensifies pressure on remaining agricultural land to maintain food production and/or could lead to increased reliance on food imports, raising concerns about sustainability due to longer supply chains, global conflict, higher carbon emissions, and food miles. Even in Lincolnshire and the UK, good farmland is at increasing flood risk and climate change. We cannot afford to hand it away for 60 years.	The Applicant recognises that there are concerns relating to the potential for the Proposed Development to impact upon food production. As considered in Chapter 12: Socio-Economics and Land Use **[AS-016]**, the total land area required for the Proposed Development represents approximately 0.09% of the total farmland within the East Midlands, and therefore constitutes a very small proportion of the regional agricultural resource. Furthermore, research undertaken by the Applicant in 2024 indicates approximately 50% of the land within the proposed Principal Site is currently used for the cultivation of non-food crops. Of this, the majority (approximately 81%) is grown for use as fuels for carbon-intensive energy sources, rather than for direct human or animal consumption. As such, while the land is agricultural in character, its current use does not solely support food production. The Proposed Development would

			therefore result in a limited and proportionate change in land use, set against the wider regional context and the Proposed Development's contribution to cleaner energy generation. It should be noted that the Order Limits include a significant portion of retained arable land (a minimum of 181ha (447.3 acres) of retained arable land is secured via the Framework LEMP **[AS-122]**, a detailed version of which is to be developed substantially in accordance with the framework plan, as secured under Requirement 8 of the Draft DCODCO **[REP1-007]**), which allows current farming practices to continue whilst also providing other benefits, such as mitigation for ground nesting birds. This retained arable land includes approximately 116ha (286.6 acres) of Subgrade 3a BMV agricultural land. Following decommissioning, as set out in the Framework DEMP **[REP1-035]** (ref. paragraph 2.3.5), the land will be returned to the landowners and available for its current use, although it will be the decision of the landowners as to how they use and manage the land. The provision of a detailed DEMP, which is to be substantially in accordance with the framework plan, is secured via Requirement 20 of the Draft DCO **[REP1-007]**.
REP1-082	Loss of BMV land	Currently, other ground-mounted solar industrial units of 1MW and above which are operational, under construction, granted planning permission and/or approved at appeal, through planning, cover 1,584ha of BMV land in Lincolnshire, in addition to the circa 3,550ha of BMV land covered by proposed or granted NSIP solar developments. The Council are of the view that the applicant's assessment underestimates the amount of BMV land affected by solar development in Lincolnshire. It is concluded that should development go ahead, there would be a significant loss of the best classifications of agricultural land, with a significant loss of economic and other benefits. In Chapter 15 (APP-040) Page 15-13, the Applicant states "The Applicant has sought to minimize the use of BMV land, and the Proposed Development is not considered to have an impact on food security." Given that the Fosse Green Energy project will take 284ha of BMV land our of agricultural production, the applicant has clearly not sought to minimize the use of BMV land.	The Applicant recognises that there are concerns relating to the potential for the Proposed Development to impact upon food production. As considered in Chapter 12: Socio-Economics and Land Use **[AS-016]**, the total land area required for the Proposed Development represents approximately 0.09% of the total farmland within the East Midlands, and therefore constitutes a very small proportion of the regional agricultural resource. Furthermore, research undertaken by the Applicant in 2024 indicates approximately 50% of the land within the proposed Principal Site is currently used for the cultivation of non-food crops. Of this, the majority (approximately 81%) is grown for use as fuels for carbon-intensive energy sources, rather than for direct human or animal consumption. As such, while the land is agricultural in character, its current use does not solely support food production. The Proposed Development would therefore result in a limited and proportionate change in land use, set against the wider regional context and the Proposed Development's contribution to cleaner energy generation. It should be noted that the Order Limits include a significant portion of retained arable land (a minimum of 181ha (447.3 acres) of retained arable land is secured via the Framework LEMP **[AS-122]**, a detailed version of which is to be developed substantially in accordance with the framework plan, as secured under Requirement 8 of the Draft DCO **[REP1-007]**), which allows current farming practices to continue whilst also providing other benefits, such as mitigation for ground nesting birds. This retained arable land includes approximately 116ha (286.6 acres) of Subgrade 3a BMV agricultural land. Following decommissioning, as set out in the Framework DEMP **[REP1-035]** (ref. paragraph 2.3.5), the land will be returned to the landowners and available for its current use, although it will be the decision of the landowners as to how they use and manage the land. The provision of a detailed DEMP, which is to be substantially in accordance with the framework plan, is secured via Requirement 20 of the Draft DCO **[REP1-007]**.
REP1-082	ALC Surveys	The small number of trials per hectare creates a material margin for classification error, meaning that the reported proportion of BMV land could change with additional sampling or alternative interpretation at the boundary between subgrades. In examination terms, this uncertainty should be treated as a risk to the robustness of the BMV assessment, not as a	**Appendix 12-B Agricultural Land Classification Report [APP-161]** states the ALC has been determined using hand-auger bore sampling at a ratio of 1 sample per hectare to a depth of 1.2m, in accordance with MAFF/Defra (1988) ALC of England and Wales – Revised Guidelines and Criteria for Grading the Quality of

		basis to minimise harm. The Applicant should be required to demonstrate that the agricultural land classification evidence is sufficiently representative and that the policy test for loss of BMV land has been applied on a precautionary, evidence based footing."	Agricultural Land and Natural England, Technical Information Note TIN049 (2012). The Applicant considers the survey to be robust therefore.
REP1-082	Cumulative Effects	In light of other projects in the wider District and County, the cumulative impact is significant. This loss of BMV land is considered to be a negative and is contrary to national policy in the NPS EN1 and EN3 and Policy S67 of the CLLP.	With regards to consideration of the potential cumulative impacts associated with the Proposed Development in combination with other solar farm proposals in the area, cumulative effects and interactions between the Proposed Development and other solar NSIPs are assessed in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. The short list of cumulative developments, inclusive of the relevant solar proposals in the area, has been agreed with both NKDC and LCC. This agreed short list of cumulative developments is provided in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. As set out in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** (ref. paragraph 12.10.15) estimates for the County of Lincolnshire, derived for previous NSIPs in Lincolnshire, estimate the proportion of BMV land to be in the order of 71%, based on extrapolation from available mapping. It is estimated that the solar NSIPs in Lincolnshire, together with the Proposed Development, account for approximately 1.4% of the BMV land in the County. Whilst there is a degree of uncertainty around this proportion it is indicative that the solar NSIPs represent a small proportion of BMV land in the County. The assessment concludes that the cumulative effect on agricultural land associated with the Proposed Development remains not significant when considered at the County level (i.e. no greater than the effect of the Proposed Development in isolation). With regard to agricultural land, planning policy recognises the importance, for agriculture, of BMV land, which is Agricultural Land Classification (ALC) Grades 1 and 2, and Subgrade 3a. The land contained within the Principal Site is comprised primarily of ALC Grade 3b with some occurrences of ALC grade 3a. There is no ALC Grade 1 or ALC Grade 2 land within the Principal Site. Full details are set out in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** and Appendix 12-B Agricultural Land Classification Report of the ES **[APP-161]**. Appendix B: NPS Accordance Tables of the Planning Statement **[AS-098]** sets out a detailed analysis of compliance with policies from the relevant NPS which are applicable to the Proposed Development. Paragraph 2.10.11 of NPS EN-3 is addressed in Appendix B: NPS Accordance Tables of the Planning Statement **[AS-098]** and within the Planning Statement **[AS-098]** itself in Section 6.3. Paragraph 2.10.11 of NPS EN-3 states that *"government seeks large scale ground-mounted solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land, and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement*". Therefore, whilst it is stated that development on lower grade agricultural land is preferred, it is not prohibited in the context of planning policy and the shared use of the land supports the provision of paragraph 2.10.11 of NPS EN-3. In the Statement of Need **[APP-184]**, the Applicant recognises that the use of brownfield land (alongside other locations for solar development), has an important role to play in decarbonisation. However, on their own, smaller scale solar schemes, including on brownfield land, are not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. The Government recognises in the overarching NPS for Energy (NPS EN-1) that growth in large-scale solar schemes, alongside smaller

schemes of solar or other renewable energy sources, is expected to improve the dependability of those assets as a combined portfolio, contributing to an adequate and dependable UK generation mix required to meet the UK's energy security needs, and the decarbonisation needs of the UK. Whilst brownfield solar and other smaller scale energy schemes are likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Proposed Development, in line with NPS EN-1. Paragraph 2.10.29 of the NPS for renewable energy infrastructure (NPS EN-3) states that while land type should not be a predominating factor in determining the suitability of the site location, preference should be given to using brownfield and non-agricultural land. As demonstrated above, these land types were identified within the area of search by checking the local authority brownfield register and drawing on local knowledge. However, no suitable areas of brownfield or non-agricultural land at the appropriate scale were found within a viable search area of the point of connection at the proposed National Grid Substation near Navenby.

REP1-082 Appendix 1	Safety Guidance	UKHSA has the following comments in regard to the proposed development. 1. Fire Safety and Air Quality Assessment The proposed 3.5-meter container separation is materially non-compliant with the current National Fire Chiefs Council (NFCC) guidance, which suggests a minimum 6-meter separation to prevent the spread of fire via thermal radiation and to allow safe access for emergency services. The applicant's low-risk air quality conclusion is based on dispersion modelling for a "worst-case scenario" of only 12 battery modules on fire. The non-compliant 3.5m spacing significantly increases the probability of a domino effect (thermal runaway) that spreads well beyond 12 units. This design failure renders the air quality modelling and its conclusion of "no noticeable discomfort" unreliable and insufficient to safeguard the community. The assessment fails to address the high probability that a lithium-ion fire will be left to burn out for days or weeks due to Fire and Rescue Service (FRS) potential protocol. This prolongs the potential exposure of nearby residents to toxic gases (Hydrogen Fluoride, Carbon Monoxide) and carcinogenic particulates (PM2.5), representing a severe chronic health risk not considered in the Acute Exposure Guideline Level 1 (AEGL-I) analysis.	As per the description in Section 3.3.33 to 3.3.41 of Chapter 3: The Proposed Development **[REP1-015]** the battery containers have been spaced with a minimum 3m clearance from each other in the centralised BESS arrangement and with 6m spacing in the distributed BESS arrangement. The indicative centralised BESS arrangement is illustrated on Figure 3-5: Indicative Centralised BESS Layout of the ES **[APP-051]**. The BESS is designed so that there is sufficient distance between the cells to mitigate the risk of fire spreading (to keep a fire isolated to a single cell (to the extent which it is possible to control this)). The Proposed Development includes embedded design mitigation and protection measures to reduce fire/explosion risk, which are detailed in the Framework BSMP **[REP1-041]**. These measures include an automatic cooling system which will be integrated into the BESS to stop or reduce battery cell thermal runaway propagation. The BESS is designed so that in the event one cell overheats/catches fire, there is sufficient distance between the cells to mitigate the risk of this spreading (to keep a fire isolated to a single cell (to the extent which it is possible to control this)). The Proposed Development layout has been developed in consultation with LFRS and has taken account of current guidance from the NFCC. Communication with the LFRS will continue through the detailed design and construction stages. It should be noted that a SoCG is currently under preparation with LCC which will include matters for the LFRS, including the BESS, and will be submitted at the midpoint of Examination, in line with the Examining Authority's request in its Procedural Decision dated 22 August 2025 **[PD-005]**. As a result of the above, the Applicant does not agree that our spacing nor Appendix 14-G: Unplanned Emissions Assessment of the ES **[APP-176]** are non-compliant with the NFCC guidance. Appendix 14-G assesses the impact of airborne chemicals and gases produced in the event of a BESS fire and shows that the dilution of gases and the distance from the BESS is sufficient to avoid any exceedances of airborne gas safety levels.

REP1-082 Appendix 1	Contamination Risk	2. Contamination Risk to land and groundwater The site is underlain by the Lincolnshire Limestone Aquifer, which is highly vulnerable to contamination due to its permeable nature. We would ask the planning regulator is satisfied whether the proposed 300m^3 firewater lagoon capacity is sufficient to contain the combined volume of fire suppression water and a severe rainfall event. The failure to contain this water would lead to the release of highly toxic firewater runoff (containing heavy metals and corrosive acids) into the aquifer, posing potential contamination risk to land and groundwater, the public water supply and environmental health.	Control of firewater runoff is set out within Appendix 9-D Framework SWDS **[REP1-025]**. This states that swales will be lined with an impermeable membrane or similar to prevent any pollution associated with fire water runoff from entering the ground. Automatic penstock control valves will also be used in the event of a fire to prevent any pollution associated with fire water runoff from entering the local watercourses without prior testing. A detailed drainage strategy will be prepared, to be substantially in accordance with the framework, as secured by Requirement 10 of the Draft DCO **[REP1-007]**. These measures will ensure that there will be no significant effects arising from the potential contamination of surface water or groundwater.
REP1-082 Appendix 1	EMF Assessment	3. Absence of an assessment on electromagnetic fields (EMF) The application completely omits any assessment of Extremely Low Frequency (ELF) Electric and Magnetic Fields (EMFs). Given the presence of high-voltage transformers and high-current power conversion systems close to residential receptors, a formal assessment demonstrating compliance with ICNIRP guidelines is a non-negotiable requirement for public health reassurance.	Chapter 14: Other Environmental Topics **[APP-039]** and Appendix 14-F: EMF Assessment **[APP-175]** provide an assessment of the likely EMF effects associated with the Proposed Development. The assessment demonstrates compliance with the relevant (ICNIRP) health thresholds and conclude that no significant EMF effects are anticipated as a result of the Proposed Development.
REP1-082 Appendix 1	Health Risk	4. Long-Term Public Health Risk (Decommissioning) The applicant's commitment to deal with the battery waste (anticipated circa 2074) is unacceptably vague, relying on "legislation in place at the time." The disposal of thousands of tonnes of hazardous lithium-ion battery waste (toxic and highly reactive) is a vast and extremely expensive undertaking. The council may want to consider whether a more detailed decommissioning framework is required.	The Applicant acknowledges the UKHSA's comment regarding decommissioning of the BESS and the management of end-of-life battery materials. Given the anticipated operational lifespan of the Proposed Development, with decommissioning not expected until approximately 2074, it is not currently possible or appropriate to specify the exact waste facilities, treatment technologies or regulatory regime that will apply at that time. Strategic energy infrastructure projects are routinely required to rely on the legislation, standards and best practice in force at the time of decommissioning, as waste regulation, battery chemistry, recycling technologies and treatment capacity are rapidly evolving. It would therefore be neither meaningful nor robust to commit the project to specific facilities or processes that may not exist, may be obsolete, or may no longer meet regulatory expectations several decades into the future. As stated in the Framework DEMP **[REP1-035]** (ref MW-D1), the Proposed Development will aim to prioritise waste prevention, by preparing for reuse, recycling and recovery and lastly disposal to landfill as per the waste hierarchy. The provision of a detailed DEMP, which is to be substantially in accordance with the framework plan, is secured under Requirement 20 of the Draft DCO **[APP016]**. This will ensure that all battery waste is managed in full compliance with the environmental, waste and health protection legislation in force at that time, including requirements for hazardous waste handling, transport, treatment and disposal, thereby protecting human health and the environment.
REP1-082 Appendix 1	Noise and Cumulative Effects	5. Noise and cumulative effects The applicant has undertaken a noise assessment that although compliant with the National Planning Policy Framework (NPPF) and the Noise Policy Statement for England (NPSE) still concludes nighttime noise will not to be below the LOAEL. However, noise impacts have not addressed future infrastructure and cumulative effects. The council may wish to consider the cumulative impacts.	The operational noise assessment presented in Chapter 11: Noise and Vibration **[APP-036]** identifies that predicted night-time noise levels at some receptors may be above the Lowest Observed Adverse Effect Level (LOAEL) but remain below the Significant Observed Adverse Effect Level (SOAEL) during operation. In line with NPSE, this does not constitute a significant adverse effect and is considered acceptable where noise is appropriately controlled and mitigated. Embedded mitigation and operational design measures are included to minimise noise effects, and the assessment concludes that no significant residual operational noise impacts would arise.

Cumulative noise effects are assessed in Section 11.10 of Chapter 11 **[APP-036]**. This concludes that cumulative noise levels would not result in significant adverse effects at noise-sensitive receptors and would remain below SOAEL thresholds during operation.

3.2 Lincolnshire Against Needless Destruction [REP1-084]

Table 3-2: Applicant's Responses to Written Submissions at Deadline 1 – Non-Statutory Organisations – Lincolnshire Against Needless Destruction

Ref. No.	Theme	Lincolnshire Against Needless Destruction Written Representation / Summary of Written Representation	Applicants Response to Lincolnshire Against Needless Destruction Written Representation
REP1-084	Cumulative Loss of Agricultural Land and Food Security	1. Lincolnshire is one of the UK's most productive agricultural counties, supplying a significant proportion of the nation's vegetables, cereals, and horticultural crops. The Fosse Green Energy project proposes the long-term conversion of a very large area of farmland to industrial-scale energy generation. On its own, this represents a substantial loss of productive land. When considered alongside the numerous other solar NSIPs and major energy schemes targeting Lincolnshire, the cumulative impact becomes a matter of national food security, not simply local land-use change.	The Applicant has responded in further detail to each of these points in the rows below.
REP1-084	Cumulative Loss of Agricultural Land and Food Security	1.1 ALC surveys exist, but transparency and completeness are lacking The applicant states that Agricultural Land Classification (ALC) surveys have been undertaken and that "72% of the project's physical infrastructure will be built on poorer quality land". However, this headline figure is insufficient for meaningful scrutiny. The applicant has not provided: • A full site-wide breakdown of ALC grades (1, 2, 3a, 3b, 4, 5) • Clear mapping showing the distribution of BMV land across the site • An explanation of how the remaining 28% of land (which may include BMV) will be affected • A cumulative assessment of agricultural land loss across Lincolnshire Without this information, the Examining Authority cannot determine whether the applicant has genuinely minimised impacts on BMV land, as required by NPS EN-1 and NPS EN-3.	A full breakdown of the Agricultural Land Classification across the Principal Site can be found in Table 12-15 of Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** and in Table 6 of Appendix 12-B: Agricultural Land Classification Report of the ES **[APP-161]**. A visual illustration of the ALC grades and borehole locations surveyed across the Principal Site as part of the ALC survey can be found in Appendix I: Site Plans of Appendix 12-B: Agricultural Land Classification Report of the ES **[APP-161]** and are also illustrated in Figure 12-5 Agricultural Land Classification for the Principal Site (Revision 2) **[AS-068]**. As set out in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**, the permanent loss of BMV land as a result of the Proposed Development relates to the loss of 1.5ha of Grade 3a to ecological enhancements, which is noted as likely to be beneficial to the soil resource, although it is acknowledged that the magnitude of impact relates to the withdrawal of land from agricultural production, and therefore is established as a minor adverse effect. It is estimated that the solar NSIPs in Lincolnshire, together with the Proposed Development, account for approximately 1.4% of the BMV land in the County of Lincolnshire. Whilst there is a degree of uncertainty around this proportion (based upon available data and associated limitations of study) it is indicative that the solar NSIPs represent a small proportion of BMV land in the County. It is anticipated that these solar NSIPs, like the Proposed Development, will be temporary developments and reversible (although the Applicant cannot speak for other applicants), whereby the land utilised for the Proposed Development is projected to be returned to the landowners and expected to be returned to pre-development use (i.e. agriculture) following decommissioning (although the landowners would choose how the land is to be used and managed), except for relatively small areas used for habitat creation, such as woodland planting, which is anticipated to be retained. As a result, no significant effects on agricultural land were identified for any of the solar NSIPs identified in Section 12.10 Cumulative Assessment of Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**.
REP1-084	Cumulative Loss of Agricultural Land and Food Security	1.2 The project lifespan is 60 years — a long-term loss of agricultural capacity The applicant is seeking a 60-year Development Consent Order for construction, operation, maintenance, and decommissioning. A 60-year operational period: • Removes agricultural land from production for the majority of a human lifetime • Spans two full generations of farming succession • Exceeds the operational lifespan of many other energy assets • Cannot reasonably be described as "temporary" in planning terms	Paragraph 2.10.150 of NPS EN-3 states that "The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State". It should be noted that the non-permanent and reversible nature of a solar NSIP with 60 year consent has also been acknowledged in the Secretary of State's decisions on a number of solar NSIPs, such as Tillbridge Solar Farm, Mallard Pass Solar Project, West Burton and Gate Burton Energy Parks, which have all been granted consent. NPS EN-3 also supports this position at paragraph 2.10.66 which states that: "time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project

Ref. No.	Theme	Lincolnshire Against Needless Destruction Written Representation / Summary of Written Representation	Applicants Response to Lincolnshire Against Needless Destruction Written Representation
		The long-term sterilisation of productive farmland must therefore be treated as a significant and enduring impact, not a reversible short-term change.	would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed." The lifespan of 60 years has been identified as being a suitable period during which the Proposed Development can provide energy to the national grid. Under Requirement 20 at Schedule 2 of the Draft DCO **[REP1-007]** decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational period the land would be available for its current use. Any material change of use would require planning permission. With regards to LAND's comment that the Proposed Development would result in 'long-term sterilisation of productive farmland', it should be noted that improvements in soil quality over time due to absence of intensive farming have been studied and reported. For example, research by Lancaster University suggests that with good management (diverse planting, low-intensity grazing, minimal soil compaction), solar farms can boost soil-carbon storage over time
REP1-084	Cumulative Loss of Agricultural Land and Food Security	1.3 Lincolnshire is being disproportionately targeted for solar NSIPs Local authorities have already expressed concern that Lincolnshire is facing an unprecedented concentration of large-scale energy schemes, each removing productive farmland and industrialising rural landscapes. Fosse Green adds materially to this pressure. The Environmental Statement does not provide: • A cumulative assessment of agricultural land loss across all relevant NSIPs • An explanation of why Lincolnshire is being asked to absorb such a disproportionate share of national solar deployment • Any strategic justification for concentrating multiple large solar schemes in one of the UK's most important food-producing counties This omission is a significant flaw in the applicant's assessment.	With regards to consideration of the potential cumulative impacts associated with the Proposed Development in combination with other solar farm proposals in the area, cumulative effects and interactions between the Proposed Development and other solar NSIPs are assessed in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. The cumulative effects assessment followed a staged approach and considered relevant developments and land allocations within a 10km radius from the Proposed Development. A wider county level study area was used for the cumulative effects assessment in relation to BMV Agricultural Land which considers other Solar NSIPs within the County of Lincolnshire. The short list of cumulative developments, inclusive of the relevant solar proposals in the area, has been agreed with both NKDC and LCC. This agreed short list of cumulative developments is provided in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. As set out in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** (ref. paragraph 12.10.15) estimates for the County of Lincolnshire, derived for previous NSIPs in Lincolnshire, estimate the proportion of BMV land to be in the order of 71%, based on extrapolation from available mapping. It is estimated that the solar NSIPs in Lincolnshire, together with the Proposed Development, account for approximately 1.4% of the BMV land in the County. Whilst there is a degree of uncertainty around this proportion it is indicative that the solar NSIPs represent a small proportion of BMV land in the County. The assessment concludes that the cumulative effect on agricultural land associated with the Proposed Development remains not significant when considered at the County level (i.e. no greater than the effect of the Proposed Development in isolation). With regards to the loss of agricultural land, this has been carefully considered through the site selection process (as set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**) and also through the sensitive design of the Proposed Development in order to minimise the impact on BMV land and agricultural operations. Appendix A: Site Selection Report of the Planning Statement **[AS-098]** demonstrates how the Applicant assessed the site against other potential alternative sites to ensure it was the most suitable, taking into account operational requirements, national and local planning policy and planning and environmental constraints, including the consideration of the loss of BMV agricultural land.
REP1-084	Cumulative Loss of Agricultural Land and Food Security	1.4 National food security is a material consideration The UK is increasingly reliant on imported food, and climate-driven disruptions to global supply chains are becoming more frequent.	With regards to the concerns relating to the potential for the Proposed Development to impact upon agricultural production, as considered in Chapter 12: Socio-Economics and Land Use **[AS-016]**, the 1,055 ha (or 2,606 acres) of agricultural land required for the

Ref. No.	Theme	Lincolnshire Against Needless Destruction Written Representation / Summary of Written Representation	Applicants Response to Lincolnshire Against Needless Destruction Written Representation
		Removing thousands of acres of productive farmland from one of the UK's most important agricultural counties is inconsistent with: • National food security objectives • The Government's Food Strategy • The principles of sustainable development in the NPPF • The requirement in NPS EN-1 to consider the long-term availability of agricultural land LAND submits that food security must be treated as a central issue in this Examination.	Proposed Development represents approximately 0.09% of the total farmland within the East Midlands, and therefore constitutes a very small proportion of the regional agricultural resource. Moreover, research undertaken by the Applicant in 2024 indicates approximately 50% of the land within the proposed Principal Site is currently used for the cultivation of non-food crops. Of this, the majority (approximately 81%) is grown for use as fuels for carbon-intensive energy sources, rather than for direct human or animal consumption. As such, while the land is agricultural in character, its current use does not solely support food production. The Proposed Development would therefore result in a limited and proportionate change in land use, set against the wider regional context and the Proposed Development's contribution to cleaner energy generation. It should be noted that the Proposed Development recognises the need to allow current farming practices to continue. The Order Limits include areas of new grassland for bird mitigation and a significant portion of retained arable land (a minimum of 181ha (or 447.3 acres) of retained arable land is secured via the Framework LEMP **[AS-122]**, a detailed version of which is to be developed substantially in accordance with the Framework LEMP, as secured under Requirement 8 of the Draft DCO), which provides mitigation for ground nesting birds whilst also allowing current farming practices to continue. This retained arable land includes approximately 116ha (286.6 acres) of Subgrade 3a BMV land. Furthermore, to minimise the impacts of the Proposed Development on BMV land, Chapter 12: Socio-Economic and Land Use of the ES **[AS-016]** (ref. paragraph 12.6.4) sets out embedded mitigation measures including the use of panels at a height which could support sheep grazing (which would allow for this land to remain in productive agricultural use), and capitalising on the opportunity to improve soil structure during the period of suspended agricultural activities throughout the operational phase of the Proposed Development. The Framework SMP **[REP1-037]** a detailed version of which is secured via Requirement 15 of the Draft DCO **[REP1-007]**, contains industry standard good practice mitigation measures to reduce impacts on soil which will ensure that the ALC grade will be unaltered through operation and decommissioning of the Proposed Development.
REP1-084	Cumulative Loss of Agricultural Land and Food Security	1.5 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide: • A full breakdown of ALC grades across the entire site • Clear mapping of BMV land and how it will be affected • A cumulative assessment of agricultural land loss across Lincolnshire • A justification for the 60-year removal of productive farmland • An explanation of why this county, above others, is being targeted for multiple overlapping solar NSIPs Until this information is provided, the agricultural impacts of Fosse Green cannot be properly understood or assessed.	The Applicant has provided this information as part of their DCO Application and directs LAND to the responses to paragraphs 1.1-1.4 of their Written Representation above.
REP1-084	Cumulative Landscape and Rural Character Impacts	Lincolnshire's rural landscape is defined by open vistas, agricultural patterns, historic villages, and long-established field structures. These characteristics are central to the county's identity and are repeatedly recognised in local landscape assessments. The Fosse Green Energy project, by virtue of its scale, massing, and spatial spread, would introduce a substantial industrial presence into this landscape. When combined with the numerous other NSIPs and large-scale solar schemes proposed across the county, the cumulative effect is one of progressive landscape industrialisation.	The Applicant has responded in further detail to each of these points in the rows below.
REP1-084	Cumulative Landscape and Rural Character Impacts	2.1 The scale of Fosse Green is landscape-defining The project covers a very large land area, extending across multiple parcels and affecting several rural communities. Its footprint is not confined to a single block of land but is dispersed across a broad area, creating a patchwork of	The effects on landscape and visual amenity are set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement **[AS-117]**. The assessment considers the impacts of the Proposed Development on landscape character areas at a national,

Ref. No.	Theme	Lincolnshire Against Needless Destruction Written Representation / Summary of Written Representation	Applicants Response to Lincolnshire Against Needless Destruction Written Representation
		industrialised zones interspersed with farmland. This pattern of development fundamentally alters the character of the landscape, replacing open agricultural vistas with extensive arrays of solar panels, fencing, substations, and access tracks.	regional, district, and local level, as well as the landscape character of the Order Limits itself. The Proposed Development's landscape and visual assessment identified significant landscape effects on landscape character at a district, local and site level during construction and Year 1 of operation, but by Year 15 of operation, significant landscape effects would be limited to the landscape character of the Principal Site and the local landscape character areas that host the solar PV infrastructure, demonstrating the localised nature of landscape impacts. The Applicant acknowledges that there would be some adverse landscape and visual effects resulting from the Proposed Development, as detailed within Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**, but considers that some impact is inevitable. This is also reflected in the Overarching NPS for Energy (NPS EN-1), paragraph 5.10.5 which states that "virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation." Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** demonstrates that significant landscape and visual effects would predominantly be in the short to medium term during construction and the early years of operation while planting matures. For example, there are no significant long term visual effects anticipated on residents of local villages as, by year 15 of operation, the proposed landscaping would have matured such that views of solar PV infrastructure within the Site would be screened. As set out in the Framework LEMP **[AS-122]** (ref. paragraph 4.1.4), the overall goal of the landscape strategy is to integrate the Proposed Development into its surrounding landscape and to avoid or minimise adverse landscape and visual effects as much as possible. An example of how this has been achieved is through the targeted planting of hedgerows, as illustrated in the Landscape Mitigation Plan, presented in Appendix A of the Framework LEMP **[AS-122]**, or the appropriate management of hedgerows to screen views (ref. paragraph 5.3.14).
REP1-084	Cumulative Landscape and Rural Character Impacts	2.2 The 60-year operational period intensifies landscape harm A 60-year lifespan means that the landscape change is effectively permanent for current and future generations. The notion that the land will be "restored" after six decades does not mitigate the fact that the rural character of the area will be transformed for the majority of a human lifetime. This long-term industrialisation must be treated as a significant adverse effect in the planning balance.	It is important to note that the Proposed Development would be temporary. The Applicant is seeking consent for a 60-year operational period. Under Requirement 20 of the Draft Development Consent Order **[REP1-007]**, decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational life, the land will be returned to the landowners and available for its existing use. Although it would be the decision of the landowners whether to return the land to its existing use, any material change of use would require planning permission.
REP1-084	Cumulative Landscape and Rural Character Impacts	2.3 Lincolnshire is already experiencing cumulative landscape pressure Local authorities have repeatedly raised concerns that Lincolnshire is being targeted by a disproportionate number of large-scale energy schemes. Each project introduces: • Perimeter fencing • Security cameras • Inverter stations • Substations • Access roads • Battery storage compounds • Cable corridors Individually, these elements may be described as "localised". Collectively, they represent a systemic shift in the character of the county's rural environment. Fosse Green contributes materially to this cumulative transformation.	While the Proposed Development comprises infrastructure for solar energy generation and associated development (such as BESS), the land is not permanently changed to industrial use in land use planning terms, and it should be noted that the Proposed Development also includes a significant amount of retained arable land. The design of the Proposed Development has sought to minimise impacts upon agricultural land, as explained in the Design Approach Document **[APP-186]** which sets out the design vision and principles that were developed at an early stage to provide a framework for design evolution. The landscape and visual cumulative assessment (see Section 10.10 of Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** considers the potential cumulative impact of ten developments within the 2km Zone of Influence, as well as four solar DCO schemes (Springwell Solar Farm, Great North Road Solar, One Earth Solar Farm, and Leoda Solar Farm) due to their similar scale and typology to the Proposed Development. Regarding the cumulative landscape and visual impact, as summarised in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]** (ref. paragraph 15.5.24), significant adverse cumulative effects are identified on landscape and visual

Ref. No.	Theme	Lincolnshire Against Needless Destruction Written Representation / Summary of Written Representation	Applicants Response to Lincolnshire Against Needless Destruction Written Representation
			amenity receptors, however the significance of effect attributed to the Proposed Development alone is not increased when considering these other developments alongside the Proposed Development, as reported in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The following significant cumulative effects were established during construction, where the magnitude of effect is higher than that of the Proposed Development in isolation. During construction: • Major Adverse (significant) landscape cumulative effects upon the North Kesteven District landscape sub-area Witham and Brant Vales due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction. Additionally, changes are anticipated to the visual amenity of users of the Viking Way (PRoW Cole/2/1 and BooG/2/2) as a result of the Proposed Development together with ID95 Application Reference: PL/0087/23, North Hykeham Relief Road, resulting in a Major adverse effect which is significant. • Moderate Adverse (significant) landscape cumulative effects on the North Kesteven landscape sub-area Limestone Heath due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction as a result of the Proposed Development together with ID63 Application Reference: EN010149, Springwell Energy Farm and ID103 Application Reference: EN0110016, Leoda Solar Farm, resulting in a Moderate adverse effect which is significant. During operation (year 15) it is considered there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development. The potential for significant cumulative landscape and visual effects of other NSIP scale solar schemes at greater distances from the Proposed Development has also been considered within the Joint Interrelationship Reports prepared for the respective examinations of such schemes, including, Springwell Solar Farm **[EN010149]**, Tillbridge Solar Project **[EN010142]**, West Burton Solar Project **[EN010132]**, and Cottam Solar Project **[EN010133]**. These reports found that, given the notable distances and lack of intervisibility between these schemes and the Proposed Development, there was no potential for significant cumulative effects.
REP1-084	Cumulative Landscape and Rural Character Impacts	2.4 The Environmental Statement underestimates cumulative landscape effects The applicant's assessment focuses primarily on the visibility of the scheme from specific viewpoints. This approach fails to capture: • The combined visual envelope of multiple NSIPs • The sequential experience of travelling through a landscape increasingly dominated by energy infrastructure • The loss of rural tranquillity associated with construction, maintenance, and security operations • The perception of industrialisation, even where screening is proposed Landscape character is not solely a matter of visibility; it is also about sense of place, coherence, and continuity. The ES does not adequately address these dimensions.	The Applicant's above response to paragraph 2.3 of LAND's Written Representation covers bullet points 1 and 2. With regards to rural tranquillity the Applicant has assumed that the LAND's Written Representation is referring to Noise, Light Pollution, Dust and Air Pollution, and Traffic Noise As explained in Chapter 3: The Proposed Development of the ES **[REP1-015]**, construction activity is expected to last between 24 and 30 months. Noise from construction activity, including piling, is assessed in Chapter 11: Noise and Vibration of the ES **[APP-036]**. With the embedded and additional mitigation measures, identified in Section 11.6 and 11.8 respectively and secured through the Framework CEMP **[REP1-031]**, significant adverse effects on health and quality of life from construction noise are not expected. Furthermore, construction noise levels have been predicted under the worst-case assumption that all construction activity would be occurring simultaneously when, in practice, given the size of the Order Limits, activities in any given location will only occur for a fraction of the full construction schedule. Chapter 11: Noise and Vibration of the ES **[APP-036]** assesses the operational noise impacts of the Proposed Development. Results presented in Table 11-19 show that no properties are expected to be significantly adversely affected by the noise from the Proposed Developments, including the inverters and substation transformers.

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Additionally, the noise model applies “moderate downwind conditions” at receptor points when calculating noise, which means that results have been calculated under reasonable worst-case meteorological conditions.

In addition, the Framework OEMP **[REP1-033]** (ref. NV-01) makes a commitment that the final operational noise levels from the Proposed Development will be no higher than those predicted in Chapter 11: Noise and Vibration of the ES **[APP-036]**; modelling will be undertaken at the detailed design phase (as secured by measure NV-01 of the Framework OEMP **[REP1-033]**) to confirm the noise levels at sensitive receptors will not exceed these thresholds. Production of a detailed OEMP, which is to be developed substantially in accordance with the Framework plan, will be secured under Requirement 13 of the Draft DCO **[REP1-007]**. Furthermore, Requirement 16 of the Draft DCO **[REP1-007]** ensures that the operational noise levels set out in Table 11-21 of Chapter 11: Noise and Vibration of the ES **[APP-036]** are to be complied with.

Light Pollution

With regards to light pollution, as secured within the Framework OEMP **[REP1-033]** (ref. LV-O3), the proposed lighting for the Proposed Development has been designed to avoid light pollution and adverse effects. The mitigation is as follows:

• No areas of the Proposed Development will be continuously lit.

• Operational lighting will be triggered by Passive Infra-red Detector (PID) systems, which will be installed around the perimeter of the Proposed Development.

• Lighting will be directional with care to minimise potential for light spillage beyond the Order Limits particularly towards neighbouring properties, habitats, highways or waterways.

• Lights installed will be of the minimum brightness and/or power rating capable of performing the desired function.

• Light fittings will be used to reduce the amount of light emitted above the horizontal (reduce upward lighting).

• The lighting of the primary substation will be motion sensor triggered, that would operate from dusk.

• Low level lighting on specific operational units will be triggered by motion sensors, from dusk.

• The inward facing CCTV cameras will typically use night-vision technology and will not require additional lighting.

Production of a detailed OEMP, which is to be developed substantially in accordance with the Framework plan, will be secured under Requirement 13 of the Draft DCO **[REP1-007]**.

Dust and Air Pollution

The Applicant acknowledges concerns regarding dust and emissions from vehicles and machinery during construction. These potential impacts have been assessed in Chapter 14.2: Air Quality of the ES **[APP-039]**. With embedded and additional mitigation measures, including best-practice dust controls and the use of Non-Road Mobile Machinery (NRMM) meeting or exceeding Regulation (EU) 2016/1628 standards, significant adverse effects on health or local air quality are not expected. All mitigation measures, including the development and implementation of a Dust Management Plan (DMP) as part of the detailed CEMP, are secured in the Framework CEMP **[REP1-031]** (ref. AQ-C1) and will be monitored throughout the construction phase. The DMP may include monitoring of dust deposition, dust flux, real-time particulate matter continuous monitoring and/or visual inspections. A detailed CEMP will be produced, to be

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			substantially in accordance with the framework plan, as secured under Requirement 12 of the Draft DCO **[REP1-007]**. Traffic An assessment of the potential effects relating to additional construction traffic including on severance, driver delay, road traffic incidents and safety is carried out within Chapter 13: Traffic and Transport of the ES **[APP-038]**, in accordance with the legislation and planning policy outlined in Appendix 13-A: Traffic and Transport Policy and Legislation **[APP-163]**. This concludes that the Proposed Development is not expected to result in any significant effects with the proposed embedded mitigation in place, including significant disruption to local residents and businesses. The assessment has used the shortest expected construction programme (24 months), which provides a worst-case scenario in terms of construction vehicle trips as this is based on a rapid, and so shorter, construction period that would generate the highest number of peak hour and daily road trips on the local network. LCC and National Highways in their respective capacities as local highway authority and highway authority for the strategic road network, have deemed the impacts on the road networks to be acceptable in principle **[RR-157]** and **[RR-201]**. The Framework CTMP **[AS-102]** sets out the measures to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network, in order to limit potential disruptions and implications on the wider transport network. Production of a detailed CTMP, to be substantially in accordance with the Framework CTMP, is secured under Requirement 14 of Schedule 2 to the Draft Development Consent Order **[REP1-007]**. The Framework CTMP **[AS-102]**, Section 7.3 commits to undertaking road condition surveys pre-construction, during construction and post-construction, to identify any defects that arise to highways assets/ verges during the construction phase of the Proposed Development for re-instatement.
REP1-084	Cumulative Landscape and Rural Character Impacts	2.5 The grid connection corridor extends the landscape impact far beyond the generating area The underground cable route and associated infrastructure create a linear zone of disruption stretching for many kilometres. This corridor introduces construction compounds, haul routes, hedgerow removal, and long-term maintenance access. It also establishes a precedent for further grid-related infrastructure in the same corridor. The landscape impact of Fosse Green is therefore not confined to the generating area but extends across a much wider geography.	An assessment of the potential effects during construction of the installation of the Grid Connection Cable has been provided within the Environmental Statement. Specifically, additional construction traffic related to the installation of the Grid Connection Cable including on severance, driver delay, and accidents and safety is carried out within Chapter 13: Traffic and Transport **[APP-038]**, in accordance with the legislation and planning policy outlined in Appendix 13-A **[APP-163]**. This concludes that the Proposed Development is not expected to result in any significant effects with the proposed embedded mitigation in place. As per Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]** potential ecological impacts of the proposed Grid Connection Cable will be temporary and the loss of important features (such as hedgerows) will be minimised or avoided. The Cable Corridor is sufficiently wide that the final route for the cable laying can be micro-sited during detailed design to avoid ecological receptors (protected species, trees, hedgerows). With regards to the landscape and visual impact of the Proposed Development, Chapter 10: Landscape and Visual Amenity of the ES **[AS-122]** concludes that the Cable Corridor will result in a major adverse (significant) impact during construction (in winter), reducing to minor adverse (not significant) by Year 1 of operation (in winter) and no effect by Year 15 of operation (in winter).
REP1-084	Cumulative Landscape and Rural Character Impacts	2.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide:	The Applicant has provided this information as part of their DCO Application and directs LAND to the responses to paragraphs 2.1-2.5 of their Written Representation above.

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		• A comprehensive cumulative landscape assessment incorporating all relevant NSIPs and major solar schemes in Lincolnshire • A sequential landscape assessment reflecting the experience of residents and road users • A clear explanation of how a 60-year industrial presence can be reconciled with the preservation of rural character • A full assessment of the landscape impacts of the grid connection corridor, including construction and long-term maintenance Until this information is provided, the landscape and rural character impacts of Fosse Green cannot be properly understood or assessed.	
REP1-084	Grid Connection, Cable Corridor and Spatial Sprawl	The Fosse Green Energy project is not confined to its generating area. The grid connection infrastructure — including the long underground cable corridor, construction compounds, haul routes, and the proposed new National Grid substation — significantly expands the project's footprint and multiplies its impacts. This spatial sprawl is a defining characteristic of modern NSIPs and must be assessed as such.	The Applicant has responded in further detail to each of these points in the rows below.
REP1-084	Grid Connection, Cable Corridor and Spatial Sprawl	3.1 The grid connection corridor extends impacts far beyond the solar array The underground cable route stretches for many kilometres across rural Lincolnshire, cutting through farmland, hedgerows, drainage systems, and established field patterns. This corridor introduces: • Extensive trenching and soil disturbance • Hedgerow removal and habitat fragmentation • Construction compounds and laydown areas • Long-term access routes for maintenance • Potential constraints on future agricultural operations These impacts are not temporary inconveniences; they reshape the landscape and agricultural function of the corridor for decades.	An assessment of the potential effects during construction of the installation of the Grid Connection Cable has been provided within the Environmental Statement. The cable will require the excavation of a trench approximately 3m by 3m (with at least 0.9m soil on the top of the cable), which is below the depth of agricultural cultivation, and the disruption to agricultural land would be temporary and reversible, with no permanent loss of BMV land. As such, whilst there would be a temporary impact during construction, there will be no long-term impacts of the Cable Corridor on agricultural land throughout the operation of the Proposed Development. Regarding the return of the agricultural land to its original quality, the Framework SMP **[REP1-038]** sets out the high standards of soil handling and management measures to be implemented (to be further detailed within the detailed SMP) which will ensure that the soil is protected and is able to revert back to its former condition. This includes the maintenance of soils and the implementation of a monitoring schedule to be undertaken and set out within the detailed SMP (ref. Section 6.9 of the Framework SMP **[REP1-038]**). It should be noted that regardless of the phase or element of construction and decommissioning works being undertaken, the works will still need to adhere to the detailed management plans, which are required to be substantially in accordance with the Framework SMP **[REP1-038]**, Framework CEMP **[REP1-031]** and Framework DEMP **[REP1-035]**, as secured by Requirements 15, 12 and 20 of Schedule 2 to the Draft DCO **[REP1-007]** respectively). As per Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]** potential ecological impacts of the proposed Grid Connection Cable will be temporary and the loss of important features (such as hedgerows) will be minimised or avoided. The Cable Corridor is sufficiently wide that the final route for the cable laying can be micro-sited during detailed design to avoid ecological receptors (protected species, trees, hedgerows). Additional construction traffic related to the installation of the Grid Connection Cable including on severance, driver delay, and accidents and safety is carried out within Chapter 13: Traffic and Transport **[APP-038]**, in accordance with the legislation and planning policy outlined in Appendix 13-A **[APP-163]**. This concludes that the Proposed Development is not expected to result in any significant effects with the proposed embedded mitigation in place. Maintenance access will be required at times throughout the operation of the Proposed Development however will not prevent continued agricultural use. With regards to the landscape and visual impact of the Proposed Development, Chapter 10: Landscape and Visual Amenity of the ES **[AS-122]** concludes that the Cable

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			Corridor will result in a major adverse (significant) impact during construction (in winter), reducing to minor adverse (not significant) by Year 1 of operation (in winter) and no effect by Year 15 of operation (in winter).
REP1-084	Grid Connection, Cable Corridor and Spatial Sprawl	3.2 The Environmental Statement underestimates the scale and duration of corridor impacts The applicant's assessment treats the cable corridor as a linear, short-term construction feature. This is misleading. In reality: • Soil structure can take decades to recover from deep trenching • Hedgerow re-establishment is slow and uncertain • Drainage systems may be permanently altered • Maintenance access requirements create long-term land-use constraints • The corridor becomes a permanent infrastructure footprint, even if buried The ES does not adequately assess these long-term effects.	The Applicant's above response to paragraph 3.1 of LAND's Written Representation covers bullet points 1, 4 and 5. Section 5.3 of the Framework LEMP **[AS-122]** details the proposed habitats, their function, implementation, establishment and long-term maintenance. A detailed plan for the establishment and maintenance of new trees will be submitted within an Arboricultural Method Statement (secured by the Framework CEMP **[REP1-031]**, ref. ARB-C1). Additionally, the existing individual trees, shrubs and woodland (including hedgerow trees) will be managed to provide longevity, increase species diversity, enhance habitat value and improve resilience to climate change. This will include the gapping up of existing hedgerows, where appropriate, to boost species and age diversity, providing better connectivity and increasing the number of climate and disease resilient species. During construction the retained vegetation will be protected. Measures to be employed will include the use of clearly defined stand-offs, managing the structure and integrity of the retained vegetation, and undertaking any pruning outside of the bird breeding season and in accordance with hedgerow regulations. Further detail of the management of existing habitat, and implementation, establishment and management of new habitat will be detailed in the detailed LEMP and CEMP to be developed during detailed design post-consent. Regarding flood risk as a result of impacts from the Proposed Development on drainage systems and surface water patterns from new impermeable areas, the Appendix 9-C: Flood Risk Assessment (FRA) of the ES **[REP1-023]** discusses flood risk from all sources for the Principal Site and the Cable Route Corridor. Paragraph 4.6.2 of the Flood Risk Assessment notes the Proposed Development scenario does not increase flood risk elsewhere and, therefore, will result in no change to flood risk. An outline drainage strategy, within Appendix 9-D: Framework SWDS **[REP1-025]**, has been prepared alongside the Flood Risk Assessment which sets out the approach to surface water management. Surface water runoff from new, impermeable, surfaces will be attenuated and drained to surface water bodies, either to watercourses, or in certain cases to ground where a watercourse is not present in the vicinity. Discharges to watercourses from new impermeable areas will be mitigated by restricting runoff rates to the 'greenfield rate of Qbar' (i.e. the mean annual peak runoff rate from a greenfield (undeveloped) site; a standard concept in UK drainage design) for all design storm return periods, attenuating excess runoff within the Order limits; therefore reducing surface water flood risk downstream. The provision of a detailed SWDS, to be substantially in accordance with the framework plan, is secured under Requirement 10 of the Draft DCO **[REP1-007]**.
REP1-084	Grid Connection, Cable Corridor and Spatial Sprawl	3.3 The corridor creates a precedent for further infrastructure Once a cable corridor is established, it becomes a logical route for: • Future grid reinforcements • Additional NSIP connections • Upgrades to the new substation • Co-located energy infrastructure	The Applicant is seeking a Development Consent Order for the Proposed Development which will comprise the construction, operation (including maintenance), and decommissioning of a ground-mounted solar PV generating station with battery storage, Onsite Substation, and associated infrastructure to generate and export/import electricity. The Draft DCO secures these worst-case parameters via Works Plans **[EN010154/APP/2.2]**, Streets, Rights of Way and Access Plans **[EN010154/APP/2.3]**, Design Approach Document Appendix A - Design Commitments **[EN010154/APP/7.3]**

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		This “infrastructure magnetism” is a well-recognised phenomenon in NSIP planning. The applicant has not assessed the risk that the corridor will attract further development, compounding cumulative impacts.	and the Proposed Development Parameters **[EN010154/APP/7.4]**, providing certainty that the impacts of the Proposed Development will be no worse than those assessed as part of the EIA. As stated on their website, National Grid is bringing forward the proposed National Grid substation near Navenby alongside the Great Grid Upgrade which seeks to upgrade the grid in order to connect homes, businesses and public services to sources of home-grown renewable energy in order to lower electricity bills and make the UK more energy secure. National Grid state on their website that based on current demand around Navenby, it is not possible to connect everything proposed in the area to existing regional substations such as Bicker Fen. To connect new developments to the network, they have identified that a new 400 kilovolt (kV) substation is needed but it should be made clear that, whilst the Proposed Development will connect into Navenby, it is not driving the Navenby substation development. Any further development brought forwards by other Applicant’s will be assessed by either the relevant Local Planning Authority or the Planning Inspectorate in line with the Town and Country Planning Act 1990 or the Planning Act 2008.
REP1-084	Grid Connection, Cable Corridor and Spatial Sprawl	3.4 The new National Grid substation intensifies spatial sprawl The project relies on a new National Grid substation, which itself is a major piece of infrastructure. Substations: • Require large footprints • Introduce tall structures, lighting, and fencing • Generate noise and visual impacts • Often become hubs for additional connections The applicant has not provided a robust cumulative assessment of how this new substation will interact with other planned or potential NSIPs in the region.	It should be noted that the proposed National Grid substation near Navenby is a separate project to Fosse Green Energy being delivered by National Grid and is not relevant for consideration as part of this DCO Application. Additionally, given that a full Planning Application and sufficient environmental information is not yet available for the proposed National Grid substation near Navenby, a full cumulative effects assessment cannot be undertaken for this scheme at this time. However, in line with the EIA Screening Opinion (24/1080/EIASCR) an environmental impact assessment will be required as part of the planning application for the proposed National Grid substation near Navenby, which will itself be required to consider the cumulative impacts of other applications in the vicinity, including the Proposed Development. Engagement between the Applicant for the Proposed Development and the applicants for the proposed National Grid substation near Navenby has been undertaken and will continue as the project progresses.
REP1-084	Grid Connection, Cable Corridor and Spatial Sprawl	3.5 The corridor fragments rural character and community cohesion The cable route passes close to multiple villages and rural settlements. Even when buried, the corridor: • Disrupts footpaths and local access • Alters the setting of rural communities • Creates long-term construction disturbance • Contributes to a sense of industrial encroachment For communities already facing multiple NSIPs, this adds to a growing perception that Lincolnshire’s rural identity is being eroded piece by piece.	The Applicant acknowledges that there will be some landscape and visual effects as a result of the Proposed Development. Land within the Order Limits does have a predominantly rural character; however, consideration of the landscape has been integral to the design of the Proposed Development. The design has sought to respect the wider landscape and the intrinsic value of the countryside and natural environment. Potential impacts on Public Rights of Way are assessed in Chapter 12: Socio-economics and Land Use of the ES **[AS-016]**. There are five PRoW which could be impacted by the Cable Corridor, all of which are expected to experience minimal to no impacts during construction and will stay open. The Streets, Rights of Way and Access Plans **[AS-106]** show each proposed temporary PRoW closure, as well as the corresponding proposed indicative location of temporary PRoW diversion. The Framework PRoW MP **[APP-195]** outlines how the Applicant will manage each PRoW within the Order Limits to ensure they have been suitably considered and will continue to operate effectively throughout the construction, operation (including maintenance) and decommissioning of the Proposed Development. The Framework PRoW MP **[APP-195]** reviews both user safety and accessibility, during the complete life cycle of the Proposed Development, considering the potential interaction and impact on the PRoW associated with the construction works, as well as the day-to-day operation of the Proposed Development.

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			The Applicant's responses to bullet points 2, 3 and 4 are provided within the response to paragraph 2.1 and 2.3 (landscape setting impact), paragraph 2.4 (construction disturbance) and paragraph 2.3 (industrial encroachment) of LAND's Written Representation.
REP1-084	Grid Connection, Cable Corridor and Spatial Sprawl	3.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide: • A full cumulative assessment of the grid connection corridor, including long-term soil, drainage, and agricultural impacts • A sequential assessment of community and landscape effects along the entire route • A justification for the chosen corridor alignment, including alternatives considered • A cumulative assessment of the new substation's role in attracting further infrastructure • A clear explanation of how the applicant will mitigate long-term fragmentation of rural character Until this information is provided, the spatial impacts of Fosse Green cannot be properly understood or assessed.	The Applicant has provided this information as part of their DCO Application and directs LAND to the responses to paragraphs 3.1-3.5 of their Written Representation above.
REP1-084	Policy Conflict and Energy Strategy	The Fosse Green Energy project is presented as a necessary contribution to national renewable energy targets. However, when assessed against the relevant policy framework — including the Planning Act 2008, NPS EN-1, NPS EN-3, the NPPF, and the Government's own Energy Security Strategy — the proposal exhibits multiple areas of conflict. These conflicts are amplified by the cumulative concentration of solar NSIPs in Lincolnshire, which is not supported by any coherent national or regional spatial strategy.	The Applicant has responded in further detail to each of these points in the rows below.
REP1-084	Policy Conflict and Energy Strategy	4.1 The proposal conflicts with NPS EN-1 requirements for sustainable land use NPS EN-1 requires decision-makers to consider the long-term availability of agricultural land and to avoid significant adverse impacts on BMV land where possible. While the applicant claims to have undertaken ALC surveys, the Environmental Statement does not demonstrate: • That BMV land has been avoided "as far as practicable" • That alternative sites or configurations were meaningfully assessed • That the cumulative loss of agricultural land across Lincolnshire has been considered This is a clear policy gap.	With regards to seeking to avoid the use of BMV land and minimise impacts on BMV land (and ongoing agricultural operations), BMV agricultural land has been taken into account both in selecting the site for, and in the sensitive design of, the Proposed Development, in order to minimise the impact on BMV and agricultural operations. The Design Approach Document **[APP-186]** explains the design vision and principles that were developed at an early stage to provide a framework for design evolution. Design Principle 2 as detailed in Section 3.9 of the Design Approach Document **[APP-186]**, relates to being sensitive to existing agricultural land and reducing development on BMV land. Appendix A: Site Selection Report of the Planning Statement **[AS-098]** demonstrates how the Applicant has sought to identify a suitable site that is as least environmentally constrained as possible. Section 4.4 of Chapter 4: Alternatives and Design Evolution of the ES **[APP-029]** sets out the methodology adopted for the site selection process. Following a formal application to National Grid for a connection into the 400kV Overhead Line at Whisby, National Grid informed the Applicant that this point of connection was not available and instead the Applicant was offered and subsequently secured a point of connection at the proposed National Grid Substation near Navenby. Having secured land with willing landowners, and in recognition of the need to consider reasonable alternatives, the Applicant sought to assess the site against other potential alternative sites to ensure it was the most suitable, taking into account operational requirements, national and local planning policy and planning and environmental constraints (including BMV consideration). Appendix A: Site Selection Report of the Planning Statement **[AS-098]** identifies four potential alternative sites including Scopwick Heath, which was discounted on the basis of it being largely located on BMV Grade 2 land, despite being close to the point of connection. Given the Proposed Development was not brought forward on the Scopwick Heath site and that the identified Order Limits does not contain any land designated as BMV Grade 1 or 2, the

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			Applicant has demonstrated that impacts on BMV agricultural land have been minimised and BMV itself has been appropriately considered in the site selection process The Applicant's response to bullet point 3 is provided within the response to paragraph 1.3 (cumulative loss of agricultural land) of LAND's Written Representation.
REP1-084	Policy Conflict and Energy Strategy	4.2 NPS EN-3 requires careful consideration of site selection — which is absent here EN-3 emphasises that solar developers must justify their choice of location, including: • Why the site is suitable • What alternatives were considered • How impacts on agricultural land, landscape, and communities have been minimised The applicant has not provided a robust alternatives assessment. There is no evidence that: • Brownfield land • Rooftop solar • Distributed generation • Co-location with existing infrastructure were seriously evaluated as alternatives to the large-scale conversion of productive farmland.	Appendix A: Site Selection Report of the Planning Statement **[AS-098]** sets out that the Applicant was approached by a group of landowners who were willing to provide land north of the A46 at Morton Manor and Housham Grange, which comprised a large area of contiguous land, for the purposes of an NSIP for solar energy generation. As Appendix A: Site Selection Report of the Planning Statement **[AS-098]** further sets out in paragraph 2.3.3, given the identification of the Site for the Proposed Development was driven by the availability of deliverable land and site suitability in line with the requirements of policy and in recognition of the need to consider reasonable alternatives, the Applicant sought to assess the site against other potential alternative sites to ensure it was the most suitable taking into account operational requirements, national and local planning policy and planning and environmental constraints. The site selection process set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]** seeks to confirm that the site identified is the most suitable for the purposes of delivering the Proposed Development, firstly considering whether it would be possible to locate the Proposed Development on an unconstrained site, and secondly whether an alternative site would perform better against the assessment criteria. Impacts on agricultural land, landscape and communities have been minimised via the iterative process of the Proposed Development design, which was informed by a suite of technical studies to identify constraints and opportunities across the Order Limits, as discussed in Chapter 4: Alternatives and Design Evolution of the ES **[APP-029]**. For example, as a part of the design evolution, landscape and visual effects have been reduced by both embedded mitigation and sensitive design. Specifically, the Applicant has held discussions with the resident at Grange Cottage regarding concerns in relation to impacts on visual amenity from the proposed Solar PV Array within Field 46 (i.e. the field immediately south-east of Grage Cottage). As a result of these comments and ongoing discussions, the Applicant has amended the design of the Proposed Development to remove the Solar PV Array from Field 46. This is secured via the Works Plans **[AS-105]**, and other secured Plans, that have been updated and submitted to the Examination. It should be noted that, in light of this design change, the visual impact at Grange Cottage is reduced to not significant in Years 1 and 15 of operation of the Proposed Development, as set out in the updated version of Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**, supported by an updated set of photomontages within Figure 10-10 of the ES **[AS-119]**. With regards to exploring the scope to utilise non-agricultural land (such as warehouses and brownfield sites) for development, Section 4.4 of Chapter 4: Alternatives and Design Evolution of the ES **[APP-029]** sets out the methodology adopted for the site selection process and Appendix A: Site Selection Report of the Planning Statement **[AS-098]** sets out how previously developed land was considered. The brownfield land registers were consulted for land within the boundaries of NKDC, South Kesteven District Council, East Lindsey District Council, West Lindsey District Council and the City of Lincoln Council, which fell into the area of search. As set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]** (ref. paragraph 4.3.5), sites over 1 hectare (2.47 acres) were identified, however none of the sites was large enough to provide a viable land

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			parcel of at least 40ha (99 acres). The Applicant identified 40ha (99 acres) as this is the size that would constitute one circuit at the chosen Medium Voltage of 33kV for the Proposed Development which would avoid the need for splitting circuits between smaller parcels involving a higher environmental impact for more interconnecting cables and avoids the need for more third party land. Therefore, no individual brownfield site from the brownfield land registers provided an adequate area to facilitate a large-scale solar project over 50MW. Furthermore, 2 of the 3 sites had planning permission for residential development or for residential/mixed use development. In addition, the potential alternative site, Hawdin's Wood, included areas of the former RAF Swinderby airfield, however given the site has been developed for a range of uses, it was not available for the purposes of the Proposed Development. As detailed in the Statement of Need **[APP-184]**, the Applicant recognises that the use of brownfield land (alongside other locations for solar development), has an important role to play in decarbonisation. However, on their own, smaller scale solar developments, including solar on brownfield land, are not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. Further, while the Applicant agrees with the Government's view that growth in rooftop solar must be a part of the pathway to achieving net zero, paragraph 7.2.6 of the **Statement of Need [APP-184]** explains that it is the Government's view that the installation of decentralised solar generation is unlikely to replace the need for new, large-scale grid connected generation capacity, since (among other factors) such large-scale centralised generation offers benefits such as the ability to transfer power over longer distances and balance supply and demand more generally. (NPS EN-1(2024), Paragraph 3.3.12). Therefore, the Applicant has proposed a large-scale scheme and the development of a comparable scale of capacity on rooftops is not an alternative proposal to the Proposed Development, because such a scale of rooftop development will also likely be needed. The Government's view is that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar (EN-1(2024) Para 3.3.20. Further, that solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation. They can be built quickly and, large-scale solar is now viable in some cases to deploy subsidy-free (EN-3(2024), Para 2.10.13-14). As such, solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector and has an important role in delivering the government's goals for greater energy independence (EN-3 Para 2.10.9-10) as well as protecting consumers from volatile prices and reducing the risk of physical interruptions to supply that might impact on essential services (EN-1(2024) Para 3.3.2). Paragraph 2.10.29 of the NPS for renewable energy infrastructure (NPS EN-3) states that while land type should not be a predominating factor in determining the suitability of the site location, preference should be given to using brownfield and non-agricultural land. As demonstrated above, these land types were identified within the area of search by checking the local authority brownfield register and drawing on local knowledge. No suitable areas of brownfield or non-agricultural land at the appropriate scale were found within a viable search area of the point of connection at the proposed National Grid Substation near Navenby as set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]** (ref. Section 4.3).

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REP1-084	Policy Conflict and Energy Strategy	4.3 The proposal conflicts with the Government's Energy Security Strategy The UK's Energy Security Strategy emphasises: • Diversification of renewable energy sources • Protection of domestic food production • Efficient use of land • Acceleration of rooftop and brownfield solar Fosse Green does not align with these principles. Instead, it contributes to a pattern of land-intensive, geographically concentrated solar deployment in a county that is already disproportionately affected.	The Applicant's response to paragraph 4.3 is provided within the above response to paragraph 4.2 (site selection and alternatives) of LAND's Written Representation, and in more detail within the Statement of Need **[APP-184]**.
REP1-084	Policy Conflict and Energy Strategy	4.4 The Planning Act 2008 requires meaningful consultation — which has not occurred Under Sections 42, 47, and 48 of the Planning Act 2008, developers must undertake: • Early • Proportionate • Effective • Transparent consultation with affected communities. LAND submits that: • Consultation has been inconsistent across NSIPs in the region • Communities are experiencing consultation fatigue due to the sheer number of overlapping schemes • The applicant has not demonstrated that consultation feedback has meaningfully shaped the proposal This undermines the legitimacy of the process.	The Consultation Report **[APP-023]** sets out the details of the consultation undertaken including how the Applicant has complied with the relevant requirements of the PA 2008, APFP Regulations and EIA Regulations. With regards to consulting the local community, the consultation process was designed to engage with those local communities who may be most affected by the Proposed Development. The Applicant defined a Core Consultation Zone of 3 km from the site which received a direct mailing at each consultation and a Wider Consultation Zone of 5 km from the site. This was to reach interested individuals or parties who were not only within the Core Consultation Zone. The Applicant also consulted with stakeholders including elected representatives, seldom heard groups, landowners, community organisations and statutory stakeholders as defined in s42 of the Planning Act 2008. The Applicant used a range of methods to share information about the proposals and to reach different audiences. This included digital methods - a project website, holding webinars and hosting online feedback forms, as well as holding in-person events and sending hard-copy letters to residents and other stakeholders. The consultation process was open to anyone who wished to take part and feedback could be given by letter, feedback form or email. Following submission of the DCO application the Applicant's website remains open and includes information on how to get in touch with the Applicant to share their views. Submitting Relevant Representations allows individuals to become "interested parties" for the purposes of the Examination to enable them to continue have their say in relation to the DCO Application. The Applicant is not responsible for the approach to consultation taken by other NSIP projects in the region. With regards to consultation fatigue the Applicant cannot compel any parties to engage with consultation, but the Consultation Report and its accompanying appendices set out how the Applicant responded to feedback that was received both during statutory consultation and non-statutory consultation. As an example of consultation feedback shaping the proposal, the proposed permissive path network has evolved following feedback at the statutory consultation stage, as explained in Chapter 4 Alternatives and Design Evolution of the ES **[APP-029]**, providing more effective linkages across the site. Changes to the design have been made in the vicinity of Thorpe on the Hill in response to feedback received from Thorpe on the Hill Parish Council and local residents during statutory consultation to reduce the impact of the Proposed Development. This has included the removal of solar PV within the field south-east of Thorpe on the Hill, which is now an area of managed arable fields for bird mitigation purposes (i.e. no solar infrastructure proposed), to increase the distance from the village to the Proposed Development itself, and providing additional vegetation screening along Fosse Lane. As such, the Proposed Development design provides a 300m buffer between the proposed solar infrastructure and residential receptors in Thorpe on the Hill. See Figure 3-2A of the ES **[AS-022]** and the Framework

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			LEMP **[AS-122]** for details. The Design Approach Document **[APP-186]** provides further details of all the design changes made in response to responses made to non-statutory and statutory consultation, the outcomes of environmental assessment and national and local planning policy.
REP1-084	Policy Conflict and Energy Strategy	4.5 The proposal fails to align with local policy and community priorities Local authorities in Lincolnshire have repeatedly expressed concern that: • The county is being targeted disproportionately • Rural character is being eroded • Agricultural land is being lost at an unsustainable rate • Infrastructure is being imposed without strategic coordination The Fosse Green proposal does not address these concerns and does not align with local spatial strategies or rural protection policies.	The Applicant notes LAND's comment that Lincolnshire is being targeted disproportionately. The Applicant's response to bullet 2 and 3 is provided within the above responses to paragraph 2.1 and 2.3 (landscape and rural character erosion) and paragraph 4.1 (agricultural land) of LAND's Written Representation. Regarding an overarching strategic spatial strategy for renewable energy across the country, the Strategic Spatial Energy Plan (SSEP) and Centralised Strategic Network Plan are in the early stages of development and are yet to be published. The SSEP is still in development, with the methodology published in May 2025. The final SSEP is not yet available, with the first iteration of the SSEP expected to be published for public consultation in Q2 2026.
REP1-084	Policy Conflict and Energy Strategy	4.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide: • A full alternatives assessment, including brownfield and rooftop options • A justification for the concentration of solar NSIPs in Lincolnshire • Evidence that consultation feedback has shaped the proposal • A clear explanation of how the scheme aligns with EN-1, EN-3, and the Energy Security Strategy • A demonstration that agricultural land impacts have been minimised in accordance with national policy Until this information is provided, the proposal cannot be considered compliant with the relevant policy framework.	The Applicant has provided this information as part of their DCO Application and directs LAND to the responses to paragraphs 4.1-4.5 of their Written Representation above.
REP1-084	Consultation Quality and Democratic Deficit	The Planning Act 2008 places a clear statutory duty on developers to undertake early, proportionate, and effective consultation with affected communities. LAND submits that the consultation undertaken for Fosse Green Energy falls short of these requirements and contributes to a wider pattern of democratic deficit across energy NSIPs in Lincolnshire.	The Applicant has responded in further detail to each of these points in the rows below. Note, however that the Planning Inspectorate, upon receipt of the DCO Application, are required to consider whether the Applicant had consulted adequately and in accordance with legislative requirements. The Planning Inspectorate invited the relevant local authorities to submit an adequacy of consultation response – these can be found within the Fosse Green Energy Examination Library at AoC-001 to AoC-013. The acceptance of the DCO Application for examination confirms that it is considered that adequate and compliant consultation has been undertaken.
REP1-084	Consultation Quality and Democratic Deficit	5.1 Consultation fatigue is a real and material issue in Lincolnshire Communities across the county are currently facing multiple overlapping NSIPs, each requiring engagement with lengthy, technical, and resource-intensive consultation processes. This includes solar farms, grid reinforcements, substations, and cable corridors. The cumulative effect is that: • Residents are overwhelmed by the volume of consultations • Parish councils are stretched beyond capacity • Community groups are forced to divide limited resources across multiple schemes The Planning Act 2008 does not anticipate a situation where one county is targeted by such a concentration of NSIPs. The applicant has not demonstrated how it has adapted its consultation approach to account for this unprecedented burden	The Applicant has pro-actively engaged with the local community and local authorities, as demonstrated in the Consultation Report **[APP-023]** and Design Approach Document **[APP-186]**. As set out in the Consultation Report **[APP-023]**, the Applicant has been in regular communication with officers from LCC and NKDC to seek technical feedback and views on approaches to consultation amongst other matters. Two stages of community consultation were held in accordance with s47 of the PA 2008. This consultation approach allowed for the iterative design of the Proposed Development, taking regard of feedback received during the preapplication process. The first stage of non-statutory consultation was held from 11 September 2023 to 20 October 2023. The second stage of statutory consultation was held from 21 October 2024 to 2 December 2024. The community consultation activities generated the following interest: a. The Applicant received 158 responses to the non-statutory consultation.

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			b. The Applicant welcomed 419 attendees at five events, including an online webinar during the non-statutory consultation. c. The Applicant received 182 responses to the statutory consultation under s47 of the PA 2008. d. The Applicant received 45 responses to the statutory consultation under s42 of the PA 2008. e. The Applicant welcomed 349 attendees at four in-person events and one online webinar during the statutory consultation under s47 of the PA 2008 The Applicant used a range of methods to share information about the proposals and to reach different audiences. This included digital methods - a project website, holding webinars and hosting online feedback forms, as well as holding in-person events and sending hard-copy letters to residents and other stakeholders. The consultation process was open to anyone who wished to take part and feedback could be given by letter, feedback form or email. Following submission of the DCO application the Applicant's website remains open and includes information on how to get in touch with the Applicant to share their views.
REP1-084	Consultation Quality and Democratic Deficit	5.2 Consultation materials were highly technical and inaccessible to many residents The consultation documents for Fosse Green were extensive, complex, and often written in specialist language. While this may be unavoidable for certain technical assessments, the applicant has a duty under Section 47 of the Planning Act to ensure that consultation materials are: • Clear • Accessible • Understandable to non-experts LAND submits that the applicant did not provide adequate non-technical summaries, visualisations, or plain-English explanations to enable meaningful engagement from the general public.	Consultation materials provided at non-statutory and statutory consultation can be found in Appendix 7.1 Non-Statutory Public Consultation Materials (11 September 2023 – 20 October 2023) and Appendix 9.1 Statutory Section 47 and Section 48 Consultation (21 10 24 – 02 12 24) Materials of the Consultation Report Appendices **[APP-024]**. The consultation materials included an Information Booklet, Posters, Layout Plans, Project Location Map, Exhibition Panels, and Project Programme. Additionally, the Applicant provided physical copies of the Preliminary Environmental Information Report, Environmental Statement and Environmental Statement Non-Technical Summary **[APP-180]** at all consultation events. The Non-Technical Summary provides an overview of the environmental impact assessments in clear, accessible terminology understandable to non-experts.
REP1-084	Consultation Quality and Democratic Deficit	5.3 The applicant has not demonstrated that consultation feedback shaped the proposal Under the Planning Act 2008, developers must show how consultation responses have influenced the design of the scheme. LAND notes that: • The applicant has not provided clear evidence of design changes resulting from community feedback • Key concerns raised by residents — including agricultural land loss, landscape impact, and cumulative effects — appear to have been acknowledged but not meaningfully addressed • The Consultation Report focuses on process rather than outcomes This undermines the legitimacy of the consultation exercise.	The Applicant has a duty to and has taken into account all responses to the non-statutory and statutory consultation. The Consultation Report **[APP-5.1]**, and specifically Chapter 10 and Chapter 11 of the report, explains how the Applicant has had regard to consultation responses. The Proposed Development has been informed by a comprehensive, iterative design process that has sought to minimise environmental effects. The Proposed Development has been developed and refined in response to consultation feedback from statutory consultees, local stakeholders and persons with land interest, with such engagement helping to shape the layout and approach to land use to minimise environmental impacts. The Design Approach Document **[APP-186]** provides further details of all the design changes made in response to responses made to non-statutory and statutory consultation, the outcomes of environmental assessment and national and local planning policy. The Applicant held a non-statutory consultation showing early proposals for the Proposed Development. This was followed with a statutory consultation where revised proposals were shown with the changes were communicated in documents including the Consultation Booklet. The Applicant also published a Community Update in March 2025 which explained the main changes made following the statutory consultation.
REP1-084	Consultation Quality and Democratic Deficit	5.4 The consultation did not adequately address cumulative impacts Residents repeatedly raised concerns about the cumulative effects of multiple NSIPs in Lincolnshire. The applicant's consultation materials: • Treated Fosse Green largely in isolation	Consultation materials provided at non-statutory and statutory consultation can be found in Appendix 7.1 Non-Statutory Public Consultation Materials (11 September 2023 – 20 October 2023) and Appendix 9.1 Statutory Section 47 and Section 48 Consultation (21 10 24 – 02 12 24) Materials of the Consultation Report Appendices **[APP-024]**. The

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		• Provided limited information on how the scheme interacts with other solar farms, grid projects, or infrastructure proposals • Did not offer cumulative visualisations or cumulative agricultural land assessments This omission prevented consultees from understanding the full implications of the proposal.	consultation materials included Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**, an earlier version of this assessment was also included in Chapter 15: Cumulative Effects and Interactions of the Preliminary Environmental Impact Report (PEI Report). In addition, each of the technical chapters of the Preliminary Environmental Information Report (PEIR) included consideration of potential cumulative effects, which have since been updated in the Environmental Statement. The only technical topic that reported significant cumulative impacts was the landscape and visual cumulative assessment (see Section 10.10 of Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. This assessment considers the potential cumulative impact of ten developments within the 2km Zone of Influence, as well as four solar DCO schemes (Springwell Solar Farm, Great North Road Solar, One Earth Solar Farm, and Leoda Solar Farm) due to their similar scale and typology to the Proposed Development. It should be noted that, as detailed above, the Applicant has provided in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]** a comprehensive cumulative assessment of the Proposed Development. During operation (Year 15) the cumulative assessment concluded there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development and the assessed cumulative schemes. Photomontages (see ES Figure 10-10 Photomontages **[APP-097, AS-119]**) were prepared to inform the visual assessment undertaken in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** and were available at the statutory consultation events to view as A3 print outs. These photomontages demonstrate how the visual impact at relevant receptors reduces over time as the proposed landscaping matures. The scope of visual receptors and representative viewpoints was agreed with AAH Consultants on behalf of North Kesteven District Council and Lincolnshire County Council after extensive consultation, as detailed within Table 10-3 of Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. It was agreed that it was proportionate for the scope of photomontages to be primarily focussed on those viewpoints representative of people that are likely to experience significant effects at year 15, although photomontages previously prepared at PEIR stage have also been updated to demonstrate how the design has evolved. With reference to Figure 10-7: Zone of Theoretical Visibility - Barrier Earth with Viewpoint Locations **[AS-059]** the agreed scope of photomontages included Viewpoints 3, 11, 17, 22, 27, 29, 30, 32, 33, 34, and 35. In terms of the photomontage type with reference to LI TGN 06/19, it was agreed to prepare Type 3/4 photomontages at year 1 winter, year 15 winter and year 15 summer for the large majority of these. The exceptions being for Viewpoints 3, 22, 27 that are anticipated to not experience significant effects at year 15, and so did not warrant a year 15 summer photomontage. As a consequence of the low height of the Proposed Development equipment and the distance between the Proposed Development and cumulative schemes they would not have added any value to the assessment and as detailed above scoped out of the Landscape and Visual Assessment in consultation with AAH Consultants, on behalf of North Kesteven District Council and Lincolnshire County Council. The cumulative agricultural land assessment can be found in Section 12.10 of Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** and assessed the cumulative effects on soils by solar Nationally Significant Infrastructure Projects (NSIPs) across the

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			entirety of Lincolnshire. The solar NSIPs considered are shown on Figure 15-4: Solar NSIPs in Lincolnshire **[AS-079]**
REP1-084	Consultation Quality and Democratic Deficit	5.5 The consultation process did not reflect the scale or duration of the project A 60-year industrial development with a multi-kilometre cable corridor and a new National Grid substation requires a consultation process that is proportionate to its impacts. LAND submits that: • The consultation period was insufficient for a project of this scale • The applicant did not provide adequate opportunities for in-person engagement • Key communities along the cable corridor were not meaningfully involved • The consultation did not reflect the long-term nature of the impacts	The Consultation Report **[APP-023]** details how the Applicant has complied with the provisions of the Planning Act 2008 (PA 2008) and other relevant legislation and guidance. The Applicant conducted extensive consultation, which reflects the scale and duration of the Proposed Development, and which was found to be adequate by the Local planning authorities and PINS when the Application was accepted. A high-level timeline of which is provided below with further detail having been provided in the Consultation Report **[APP-023]**. A soft launch to introduce the Proposed Development to key stakeholders and communities was carried out in May 2023. Two stages of consultation were undertaken. Non-statutory consultation ran between 11 September and 20 October 2023. A further, statutory, consultation under s47 of the PA 2008 took place between 21 October 2024 and 2 December 2024. During this second stage, consultation was also carried out under s42 of the PA 2008 in parallel with consultation under s47 and s48. 2.2.5 All responses to the statutory consultation under sections 42, 47 and 48 received before and after the consultation period closed have been considered by the Applicant in compliance with s49 of the PA 2008. All responses have been considered and accommodated where possible by the Applicant when preparing the application for development consent. The Applicant's responses to all feedback are summarised in the Consultation Report chapters, with all comments received during statutory consultation and the Applicant's responses listed in the Consultation Report Appendices **[APP-024]**, as follows: a. Chapter 10: Statutory Consultation under s47 of the PA 2008 (21 October 2024 to 2 December 2024): Responses Received, Issues Raised and Changes Made; b. Chapter 11: Statutory Consultation under s42 of the PA 2008 (21 October 2024 to 2 December 2024): Responses Received, Issues Raised and Changes Made; c. Appendix 4: Applicant Response in Regard to Section 47 Comments (21 October 2024 - 2 December 2024); and d. Appendix 5: Applicant Response in Regard to Section 42 Comments (21 October 2024 - 2 December 2024). The Applicant's response to the remainder of the points raised in paragraph 5.5 is provided within the above response to paragraph 5.3 (consultation) of LAND's Written Representation, and more thoroughly within the Consultation Report **[APP-023]** and Consultation Report Appendices **[APP-024]**.
REP1-084	Consultation Quality and Democratic Deficit	5.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide: • Evidence of how consultation feedback has shaped the proposal • A clear explanation of how the consultation complied with Sections 42, 47, and 48 of the Planning Act 2008 • A cumulative consultation assessment addressing the burden placed on Lincolnshire communities • Additional engagement with communities along the cable corridor • A revised non-technical summary that is accessible to the general public Until these issues are addressed, the consultation cannot be considered adequate or compliant with statutory requirements.	The Applicant's response to bullets 1, 2, and 4 is provided within the above responses to paragraphs 5.1-5.5 (consultation) of LAND's Written Representation. Chapter 4 Alternatives and Design Evolution **[APP-029]** presents a description of how consultation feedback has shaped the proposals, in particular Section 4.9 and 4.10. The Consultation Report **[APP-023]** lists all the feedback received and explains whether it changed the proposals or not (and if not, why). Examples are the permissive paths, which were amended around Tunman Wood following feedback from the Local Wildlife Trust, and the addition of a new permissive path at Thurlby following a suggestion from a local resident. Solar PV was also removed from a field near Bassingham following a request from nearby residents. Other changes are discussed in the Consultation Report. An assessment of cumulative consultation burden is not considered necessary. As detailed above, the Applicant has complied with the provisions of the Planning Act 2008

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			(PA 2008) and other relevant legislation and guidance. The Applicant considers that the consultation conducted throughout the lifecycle of the Proposed Development is proportionate to the scale and duration of the Proposed Development, and which was found to be adequate by the local planning authorities and PINS when the Application was accepted. The Applicant used a range of methods to share information about the proposals and to reach different audiences. This included digital methods - a project website, holding webinars and hosting online feedback forms, as well as holding in-person events and sending hard-copy letters to residents and other stakeholders. The consultation process was open to anyone who wished to take part and feedback could be given by letter, feedback form or email. Following submission of the DCO application the Applicant's website remains open and includes information on how to get in touch with the Applicant to share their views. A Non-Technical Summary of the Preliminary Environmental Information Report was available at statutory consultation. This was updated for the DCO Submission into the Environmental Statement Non-Technical Summary **[APP-180]**, which provides an overview of the environmental impact assessments in clear, accessible terminology understandable to non-experts, and therefore no revision is necessary.
REP1-084	Alternatives, Site Selection and Over-Concentration in Lincolnshire	The Planning Act 2008 and the National Policy Statements (EN-1 and EN-3) require developers to demonstrate that they have selected sites responsibly, considered reasonable alternatives, and minimised adverse impacts. LAND submits that the Fosse Green Energy proposal fails to meet these requirements. The applicant has not provided a robust alternatives assessment, nor has it justified why Lincolnshire — one of the UK's most important agricultural counties — should host yet another large-scale solar NSIP.	The Applicant has responded in further detail to each of these points in the rows below.
REP1-084	Alternatives, Site Selection and Over-Concentration in Lincolnshire	6.1 The applicant has not demonstrated that alternative sites were meaningfully considered NPS EN-1 requires developers to explain why their chosen location is suitable and what alternatives were assessed. EN-3 goes further, stating that solar developers must consider: • Brownfield land • Previously developed land • Rooftop solar • Co-location with existing infrastructure • Smaller distributed sites rather than a single large land-take The applicant has not provided evidence that these alternatives were seriously evaluated. Instead, the proposal relies on the availability of large tracts of agricultural land — a choice driven by convenience, not necessity.	The Applicant's response to paragraph 6.1 is provided within the above response to paragraph 4.2 (site selection and alternatives) of LAND's Written Representation, and in more detail within the Statement of Need **[APP-184]**.
REP1-084	Alternatives, Site Selection and Over-Concentration in Lincolnshire	6.2 The proposal contributes to an over-concentration of solar NSIPs in Lincolnshire. Lincolnshire is already facing an unprecedented number of large-scale solar and energy infrastructure proposals. This clustering is not the result of a national strategy but of developers independently targeting the county due to: • Large fields • Flat topography • Existing grid constraints that attract reinforcement projects • A lack of national spatial planning for solar The cumulative effect is that Lincolnshire is being asked to absorb a disproportionate share of the national solar burden, with no strategic justification.	A Strategic Spatial Energy Plan (SSEP) and Centralised Strategic Network Plan (which would be an overarching strategic spatial strategy for renewable energy across the country) are in the early stages of development and are yet to be published. The SSEP is still in development, with the methodology published in May 2025. The final SSEP is not yet available, with the first iteration of the SSEP expected to be published for public consultation in Q2 2026. The need for the Proposed Development is set out fully in the Statement of Need **[APP-184]**. The UK's transition to a low-carbon energy system is necessary to avoid the effects of climate change. Increasing solar generation plays a key part in achieving the UK's legally binding target to achieve net zero by 2050, in line with the Climate Change Act 2008 (as amended) – as stated in Chapter 4: Alternatives and Design Evolution of the ES **[APP-029]**, paragraph 3.3.20 of NPS EN-1 recognises that solar (alongside wind) is the lowest cost way of generating electricity, and that analysis shows that "a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed

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			predominantly of wind and solar" – and is critical to the provision of adequate low-carbon electricity to meet increasing demands. Any future energy system must be resilient and affordable, and solar PV has been identified as being vital for a decarbonised grid and can support security of supply as part of a portfolio of different generation technologies, including wind and nuclear. Large-scale solar is an essential part of the future electricity system which must be deployed where there is the natural resource, where suitable land is available, and in proximity to available grid connection locations, such as the area local to the Proposed Development, in line with the overarching NPS EN-1. The Proposed Development represents a significant opportunity in this respect and would provide a significant contribution to the delivery of the UK Government's commitment to achieve net zero emissions by 2050.
REP1-084	Alternatives, Site Selection and Over-Concentration in Lincolnshire	6.3 The applicant has not justified why this county should bear this level of impact The Environmental Statement does not address: • Why Lincolnshire is an appropriate location for yet another solar NSIP • How the proposal fits within a wider national or regional energy strategy • Whether other regions with lower agricultural value were considered • Whether a distributed approach could achieve the same output with less harm This is a significant omission, given the scale of the project and its 60-year operational period.	The Applicant's response to paragraph 6.3 is provided within the above response to paragraph 6.2 (Lincolnshire clustering) of LAND's Written Representation, and in more detail within the Statement of Need **[APP-184]**.
REP1-084	Alternatives, Site Selection and Over-Concentration in Lincolnshire	6.4 The absence of a national spatial strategy does not absolve the applicant of responsibility While the UK currently lacks a national land-use framework for solar deployment, this does not permit developers to cluster NSIPs in a single county without justification. In fact, the absence of such a framework makes it even more important that: • Alternatives are rigorously assessed • Cumulative impacts are fully considered • Regional equity is taken into account The applicant has not done so.	Chapter 4 Alternatives and Design Evolution of the ES **[APP-029]** sets out the alternatives considered, as follows: • Consideration of a 'no development' scenario as an alternative to the Proposed Development, however this was not considered a reasonable alternative to the Proposed Development as it would not deliver the renewable electricity generation capacity or storage proposed. • Other generation schemes, such as wind power, nuclear, coal, or gas fired power stations, however these were not assessed given their unsuitability at the Site (in the case of a large-scale wind project and nuclear energy) or their inability to contribute to the UK's need for low carbon electricity (in the case of coal or gas). • A smaller scheme, although this would not deliver the same generation capacity or energy security and climate change benefit as the Proposed Development and, as such, would not represent a reasonable alternative. • Site selection, which is explained in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**, • Alternative solar technologies, e.g solar panel and arrangement of BESS. • Alternative site layouts, which evolved iteratively taking into consideration the outcomes of environmental assessment, the Design Vision and Design Principles, the functionality of the Proposed Development, and feedback from stakeholders during both the non-statutory and the statutory consultation process. • Alternative cable corridors. • Alternatives put forward at the statutory consultation. In terms of site selection, the site selection process seeks to verify the location of the Proposed Development by considering whether the site is the most suitable taking into account operational requirements, national and local planning policy and environmental constraints. As stated in paragraph 2.3.1 of Appendix A: Site Selection Report of the Planning Statement **[AS-098]**, the Applicant was approached by a group of landowners who were willing to provide land north of the A46 at Morton Manor and Housham

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			Grange, which comprises a large area of contiguous land, for the purposes of a nationally significant infrastructure project related to solar energy generation. Following a review of available capacity in the transmission network the Applicant identified a line in and line out connection into the 400kV Overhead Line close to Whisby Hall. A desk top review of the site to consider planning and environmental constraints, concluded that the site was viable, and accordingly, a formal application was made to National Grid for a connection into the 400kV Overhead Line. However, National Grid informed the Applicant that this point of connection (POC) was not available and instead the Applicant was offered and subsequently secured a POC at the proposed National Grid substation near Navenby, which was a location capable of serving multiple customers, including the Applicant. The Applicant acknowledges that there is the potential for Cumulative Effects as a result of the combined impact of the Proposed Development together with other energy schemes proposed in the area and recognises local concerns regarding the concentration of energy developments in Lincolnshire. A detailed cumulative effects assessment has been provided in Chapter 15: Cumulative Effects and Interactions of the Environmental Statement **[APP-040]**. The short list of cumulative developments, inclusive of the relevant energy infrastructure proposals in the area, has been agreed with NKDC and LCC. The agreed short list of cumulative developments is provided in Chapter 15: Cumulative Effects and Interactions of the ES **[APP040]** (ref. Table 15-8). The cumulative effects assessment followed a staged approach and considered relevant developments and land allocations within a 10km radius from the Proposed Development. A wider county level study area was used for the cumulative effects assessment in relation to BMV Agricultural Land which considers other Solar NSIPs within the County of Lincolnshire. As summarised in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]** (ref. paragraph 15.5.24), significant adverse cumulative effects are only identified on landscape and visual amenity receptors, however the significance of effect attributed to the Proposed Development alone is not increased when considering these other developments alongside the Proposed Development, as reported in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The following significant cumulative effects were established during construction, where the magnitude of effect is higher than that of the Proposed Development in isolation. During construction: • Major Adverse (significant) landscape cumulative effects upon the North Kesteven District landscape sub-area Witham and Brant Vales due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction. Additionally, changes are anticipated to the visual amenity of users of the Viking Way (PRoW Cole/2/1 and BooG/2/2) as a result of the Proposed Development together with ID95 Application Reference: PL/0087/23, North Hykeham Relief Road, resulting in a Major adverse effect which is significant. • Moderate Adverse (significant) landscape cumulative effects on the North Kesteven landscape sub-area Limestone Heath due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction as a result of the Proposed Development together with ID63 Application Reference: EN010149, Springwell Energy Farm and ID103 Application Reference: EN0110016, Leoda Solar Farm, resulting in a Moderate adverse effect which is significant. During operation (year 15) it is considered there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development. The potential for significant cumulative effects of other NSIP scale solar schemes has also been considered within Joint Interrelationship Reports prepared for the respective

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			examinations of such schemes, including, Springwell Solar Farm **[EN10149]**, Tillbridge Solar Project **[EN010142]**, West Burton **[EN010132]**, and Cottam **[EN010133]**. These Reports found that, given the notable distances and lack of intervisibility between these schemes and the Proposed Development, there was no potential for significant cumulative effects.
REP1-084	Alternatives, Site Selection and Over-Concentration in Lincolnshire	6.5 The site selection process appears driven by land availability, not suitability The proposal relies heavily on the fact that large parcels of agricultural land are available. This is not a valid planning justification. Site selection must be based on: • Minimising harm • Avoiding BMV land • Protecting rural character • Reducing cumulative impacts • Ensuring fair distribution of infrastructure The applicant has not demonstrated that these principles guided the site selection process.	The Applicant's response to paragraph 6.5 is provided within the above response to paragraph 4.2 (minimising harm), to paragraph 1.1, 1.3, and 1.4 (avoiding BMV land and protecting rural character), and to paragraph 6.4 (reducing cumulative impacts) of LAND's Written Representation, and in more detail within the Statement of Need **[APP-184]**.
REP1-084	Alternatives, Site Selection and Over-Concentration in Lincolnshire	6.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide: • A full alternatives assessment, including brownfield, rooftop, and distributed options • A justification for the concentration of solar NSIPs in Lincolnshire • Evidence that site selection was based on minimising harm, not simply land availability • A cumulative assessment of regional solar deployment across the UK • An explanation of how the proposal aligns with national energy strategy and regional equity Until this information is provided, the site selection and alternatives assessment cannot be considered adequate or compliant with national policy.	The Applicant has provided this information as part of their DCO Application and directs LAND to the responses to paragraphs 6.1-6.5 of their Written Representation above.
REP1-084	Procedural Robustness, Evidence Gaps and Internal Inconsistencies in the Application	A Development Consent Order must be supported by a complete, internally consistent, and methodologically robust evidence base. LAND submits that the Fosse Green Energy application contains significant gaps, omissions, and inconsistencies that undermine the reliability of the Environmental Statement (ES) and the applicant's overall case. These issues materially affect the Examining Authority's ability to assess the true impacts of the proposal.	The Applicant has responded in further detail to each of these points in the rows below.
REP1-084	Procedural Robustness, Evidence Gaps and Internal Inconsistencies in the Application	7.1 Key assessments are incomplete or insufficiently evidenced Across multiple chapters of the ES, the applicant relies on headline statements without providing the underlying data needed for scrutiny. Examples include: • Agricultural Land Classification (ALC) results summarised without full mapping or grade breakdown • Landscape assessments that focus on isolated viewpoints rather than sequential or cumulative experience • Cable corridor impacts described as "temporary" without long-term soil, drainage, or agricultural recovery evidence • Traffic and transport assessments that do not fully account for construction intensity along rural lanes These omissions prevent consultees and the Examining Authority from forming an informed view of the project's true impacts.	A full breakdown of the Agricultural Land Classification across the Principal Site can be found in Table 12-15 of Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** and in Table 6 of Appendix 12-B: Agricultural Land Classification Report of the ES **[APP-161]**. This distinguishes between Grade 3a and 3b. A visual illustration of the ALC grades and borehole locations surveyed across the Principal Site as part of the ALC survey can be found in Appendix I: Site Plans of Appendix 12-B: Agricultural Land Classification Report of the ES **[APP-161]** and are also illustrated in Figure 12-5 Agricultural Land Classification for the Principal Site (Revision 2) **[AS-068]**. Cumulative effects and interactions between the Proposed Development and other solar NSIPs are assessed in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. The short list of cumulative developments, inclusive of the relevant solar proposals in the area, has been agreed with NKDC and LCC. The agreed short list of cumulative developments is provided in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. The cumulative assessment contained in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** is consistent with PINS Guidance on Cumulative Effects and follows a proportionate methodology as outlined in GLVIA3. The assessment primarily focusses on the cumulative schemes within the 2km ZoI, as this was judged to be the geographic area across which landscape and visual effects were most likely to

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			occur, although the nearest NSIP scale solar schemes beyond 2km were also scoped in to the cumulative assessment given their similar scale and typology to the Proposed Development. While the site will be used for solar energy generation and battery energy storage, permission is sought for a temporary period. The Proposed Development comprises a temporary installation and at the end of the operational life of the Proposed Development, the above ground infrastructure will be removed, and the land returned to the landowners and will be available for its original use, noting that the landowners would choose how the land is to be used and managed, in accordance with the Framework DEMP **[REP1-035]**.(ref. paragraph 2.3.5). The non-permanent and reversible nature of a solar NSIP with 60 year consent has also been acknowledged in the Secretary of State's decisions on other solar NSIPs, such as Tillbridge Solar Farm, Mallard Pass Solar Project, West Burton and Gate Burton Energy Parks, which have all been granted consent. The Cable Corridor impacts will be temporary as following construction of the Cable Corridor, all disturbed land will be fully reinstated. The impact on this land would be a few weeks – or months at worst – affecting one growing season. This is considered to be no discernible loss or reduction of soil functions or soil volumes that restrict the current farming activity; a Negligible magnitude of change using the IEMA criteria. This corresponds with a Slight effect, which in the ES would correspond with a minor adverse effect that is not significant. The land will be reinstated to its current condition and will be available for farming immediately after restoration. The detailed SMP will be prepared substantially in accordance with the Framework SMP **[AS100]**, as secured via Requirement 15 of Schedule 2 of the Draft DCO **[REP1-007]**, and as such will include considerations regarding the handling of soils. An assessment of the potential effects relating to additional construction traffic is set out within Chapter 13: Traffic and Transport of the ES **[APP-038]**, in accordance with the legislation and planning policy outlined in Appendix 13-A of the ES **[APP-163]**. This concludes that the Proposed Development is not expected to result in any significant effects with the embedded mitigation proposed in the Framework CTMP **[AS-102]** in place. A detailed version of the Framework CTMP **[AS-102]**, to be substantially in accordance with the framework plan, is secured under Requirement 14 of the Draft DCO **[REP1-007]**. in place. The assessment has used the shortest expected construction programme (24 months), which provides a worst-case scenario in terms of construction vehicle trips as this is based on a rapid, and so shorter, construction period that would generate the highest number of peak hour and daily road trips on the local network. LCC and National Highways in their capacities of being responsible for the local and strategic road networks, respectively, have deemed the impacts on the road networks to be acceptable in principle **[RR-157]** and **[RR-201]**. An HGV routing plan is shown on Figure 13-4: Heavy Goods Vehicle (HGV) Routing **[AS-072]** of the ES, identifying the key routes which will be used by HGVs to travel to and from each site access. Compound locations are shown on Figure 3-1: Construction Compound and Access Locations **[AS-021]**. Mitigation and traffic management measures to ensure safe driving will be implemented as set out within the Framework CTMP **[AS-102]** a detailed version of which, to be substantially in accordance with the framework plan, is secured under Requirement 14 of the Draft DCO **[REP1-007]**. This includes usage of defined HGV routes and measures to limit when vehicles can travel to

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			and from the Site in order to avoid peak traffic times. A monitoring system would be put in place along the route of all HGVs travelling to and from the Site which would record any noncompliance and communicate any issues with the relevant contractors/suppliers. The Framework CTMP **[AS-102]** also provides details of enforcement measures should there be any instances of non-compliance.
REP1-084	Procedural Robustness, Evidence Gaps and Internal Inconsistencies in the Application	7.2 Internal inconsistencies undermine confidence in the assessment LAND has identified several areas where the applicant's own documents appear inconsistent. These include: • Describing the project as "temporary" while simultaneously seeking a 60-year operational period • Claiming to avoid BMV land "as far as practicable" while not providing the full ALC dataset needed to verify this • Presenting the cable corridor as a short-term disturbance despite acknowledging long-term maintenance access requirements • Stating that cumulative impacts have been considered while providing minimal cumulative analysis in key ES chapters Such inconsistencies raise legitimate concerns about the reliability of the applicant's conclusions.	The Applicant's response to paragraph 7.2 is provided within the above response to paragraph 7.1 ('temporary' 60-year operational period and cable corridor disturbance), to paragraph 1.1, 1.3, 1.4,and 7.1 (avoiding BMV land), and to paragraph 6.4 (reducing cumulative impacts) of LAND's Written Representation.
REP1-084	Procedural Robustness, Evidence Gaps and Internal Inconsistencies in the Application	7.3 The cumulative assessment is methodologically weak The ES repeatedly states that cumulative effects have been considered, yet: • The list of cumulative schemes is incomplete • Several relevant NSIPs in Lincolnshire appear to be omitted or under-weighted • Cumulative agricultural land loss is not quantified • Cumulative landscape change is not assessed at a strategic level • The cumulative burden on rural communities is not addressed Given the unprecedented concentration of NSIPs in Lincolnshire, this is a serious deficiency.	The Applicant's response to paragraph 7.3 is provided within the above response to paragraph 6.4 (cumulative assessment) of LAND's Written Representation.
REP1-084	Procedural Robustness, Evidence Gaps and Internal Inconsistencies in the Application	7.4 The applicant relies heavily on mitigation without demonstrating its effectiveness Across multiple ES chapters, impacts are downgraded from "significant" to "not significant" based on proposed mitigation. However: • The effectiveness of screening, hedgerow planting, and landscape buffers over a 60-year period is not evidenced • Soil recovery after deep trenching is assumed rather than demonstrated • Construction traffic mitigation relies on behavioural assumptions rather than enforceable controls • Biodiversity net gain claims depend on long-term management plans that are not yet secured Mitigation cannot be used to mask the true scale of impacts without robust evidence.	New planting will be planted as part of the construction phase. In the unlikely event that screening planting fails, it will be replaced with like-for-like stock to ensure it performs as intended (and assessed). Refer to paragraphs 5.3.15 and 5.3.23(g) of the Framework LEMP **[AS-122]**. As secured by the Framework LEMP **[AS-122]**, maintenance measures will be specified and implemented as part of the detailed LEMP, including (ref. paragraph 7.1.7) a postconstruction monitoring programme (which will be formalised, agreed and included within the detailed LEMP) comprising walkover surveys of the Order Limits undertaken between April and June in years 2, 4, 6, 10 and then every 5 years post-construction until year 60. As noted in the Framework LEMP **[AS-122]** (ref. paragraph 7.1.11) results from the postconstruction monitoring will feed into the management plan and, if required, management may be amended accordingly based on this monitoring; for example, replacement planting and/or changes to planting species where planting has failed to establish. The Framework LEMP **[AS-122]** also proposes 'temporary landscape measures' which include planting establishment/management principles for the screening planting (ref. Paragraphs 5.2.4, 5.3.22 and 5.3.23). The aim of establishment maintenance is to encourage thick, bushy growth, and includes monitoring requirements (ref. paragraphs 5.3.23(d-h)). In addition, the existing hedgerows will be managed at a minimum height of 3m (ref. Paragraph 5.2.10), whilst proposed hedgerows will be planted and managed between 3-4m (ref. paragraph 5.3.14) for the lifetime of the project. The Framework CEMP **[APP189]** (ref. ID GG-C1) also notes that "Native hedgerows will be planted/infilled and

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			maintained to deliver a minimum height at least the same as the upper edge of the panels, which is currently proposed to be 3.5m". Restoration to pre-construction condition of the soil resource is secured by the Framework SMP **[AS-100]** (which is to be developed into a detailed SMP, substantially in accordance with the Framework Plan, secured under Requirement 15 (soil management plan) of the Draft DCO **[REP1-007]**). The cable will require excavation of a trench approximately 2m by 2m (with at least 0.9m soil on the top of the cable, which is below the depth of agricultural cultivation), and the disruption to agricultural land would be temporary and reversible, with no permanent loss of farmland. The Framework CTMP **[AS-102]** sets out the measures, and where necessary enforcement, to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network, in order to limit potential disruptions and implications on the wider transport network. The production of a detailed CTMP (which will be substantially in accordance with the framework) for approval by LCC is secured under Requirement 14 of the Draft DCO **[REP1-007]**. This requirement also provides that construction of the Proposed Development must be carried out in accordance with the approved CTMP. The Framework LEMP **[AS-122]**, secured by the DCO, includes detail on the relevant management/monitoring regimes to deliver BNG targets that will be implemented as part of the detailed LEMP. The following is secured within the Framework LEMP **[AS-122]** (ref. paragraph 7.1.7) which will be carried through into the detailed LEMP: "A post-construction monitoring programme will be formalised, agreed and included within the detailed LEMP. Walkover surveys of the DCO Site will be undertaken between April and June in years 2, 4, 6, 10 and then every 5 years post-construction until year 60. This monitoring will also be used for the purposes of BNG Condition Assessments that requires a 30-year management plan." Further, Requirement 8 in Schedule 2 of the Draft DCO provides that the detailed LEMP must include details of how the plan proposals will contribute to the achievement of biodiversity net gain during the operation of the authorised development.
REP1-084	Procedural Robustness, Evidence Gaps and Internal Inconsistencies in the Application	7.5 The application does not provide sufficient detail for a 60-year DCO A 60-year operational period requires: • Long-term management plans • Maintenance access strategies • Decommissioning methodologies • Monitoring frameworks • Landscape and ecological management over multiple decades The application does not provide the level of detail needed to justify such a long consent period.	The Applicant has provided framework management plans as part of the DCO Application, which will be secured via the relevant Requirements in Schedule 2 of the Draft DCO **[APP-016]**: - Framework CEMP **[REP1-031]** secured in Requirement 12; - Framework OEMP **[REP1-033]** secured in Requirement 13; - Framework SMP **[AS-100]** secured in Requirement 15; - Framework LEMP **[AS-122]** secured in Requirement 8; and - Framework DEMP **[REP1-035]** secured in Requirement 20. The above framework management plans include detail on long-term management, maintenance access strategy, decommissioning methodologies, monitoring frameworks and landscape and ecological management approaches that will be the basis of the detailed management plans. The above Requirements provide that the detailed management plans (which must be substantially in accordance with the framework management plans) must be submitted to the relevant planning authority for approval and are to be implemented as approved.

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REP1-084	Procedural Robustness, Evidence Gaps and Internal Inconsistencies in the Application	7.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to: • Provide full datasets for all headline claims, including ALC mapping and cumulative scheme lists • Resolve internal inconsistencies across the ES • Supply a robust cumulative impact methodology and re-assess key topics accordingly • Provide evidence-based justification for all proposed mitigation • Submit detailed long-term management, monitoring, and decommissioning plans appropriate for a 60-year DCO Until these issues are addressed, the application cannot be considered procedurally robust or evidentially sound.	The Applicant has provided this information as part of their DCO Application and directs LAND to the responses to paragraphs 7.1-7.5 of their Written Representation above.
REP1-084	Community Impacts, Rural Amenity and the Cumulative Burden on Local Residents	The Fosse Green Energy project will have significant and long-lasting effects on the communities living within and around the development area. These impacts extend far beyond visual change and encompass disruption to daily life, rural amenity, transport networks, heritage settings, and community wellbeing. When combined with the numerous other NSIPs currently proposed or under examination in Lincolnshire, the cumulative burden on local residents becomes substantial and unacceptable.	The Applicant has responded in further detail to each of these points in the rows below.
REP1-084	Community Impacts, Rural Amenity and the Cumulative Burden on Local Residents	8.1 Construction impacts will be extensive, prolonged and disruptive The construction phase of a project of this scale — including the generating area, cable corridor, and new substation — will involve: • Heavy goods vehicle (HGV) movements on rural lanes • Noise, dust, vibration and air quality impacts • Temporary road closures and diversions • Construction compounds and laydown areas • Long working hours over an extended period For communities already facing multiple NSIPs, this represents yet another prolonged period of disruption. The applicant has not demonstrated that construction impacts have been minimised or that rural roads can safely accommodate the required traffic.	The Framework CTMP **[AS-102]** sets out the measures to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network, in order to limit potential disruptions and implications on the wider transport network. In particular, and where practicable, HGV routing is expected to follow the most direct routes to and from the construction access points from the A46 for the Principal Site and to/ from the A15 for the Cable Corridor. The Framework CTMP **[AS-102]** will restrict HGVs to routes which avoid smaller surrounding villages when travelling to/ from the construction compounds as illustrated in Figure 13-4: Heavy Goods Vehicle (HGV) Routing **[AS-072]** of the ES, which identifies the key routes which will be used by HGVs to travel to/ from each site access. The only section of road with a 7.5 tonne weight restriction which is proposed for use by construction traffic associated with the Proposed Development, is Fosse Lane north of the junction with the A46 (heading towards Thorpe on the Hill). However, construction vehicles will only utilise a short distance of this road before accessing construction access C-002 (see Figure 3-1 Construction Compound and Access Locations of the ES **[AS-021]**), The CTMP establishes controls to ensure that any construction traffic routed close to residential receptors is appropriately managed, with measures in place to protect pedestrian, cyclist and equestrian safety and to maintain the quiet character of local villages as far as practicable. The Framework CTMP **[AS-102]** also sets out the measures, and where necessary enforcement, to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network, in order to limit potential disruptions and implications on the wider transport network. A commitment that road condition surveys will be carried out pre-construction, during construction and post-construction, to identify any defects that arise to highways assets/ verges during the construction phase of the Proposed Development is also made in the Framework CTMP **[AS-102]**. The production of a detailed CTMP, which is to be developed substantially in accordance with the Framework plan, is secured under Requirement 14 of the Draft DCO **[APP-016]**.

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			The Applicant acknowledges the concerns raised regarding the potential for disruption associated with construction working hours, including Saturday working. As set out in Chapter 3: The Proposed Development of the ES **[REP1-015]**, paragraph 3.4.13, core construction working hours on-site will be as follows: a. Monday to Friday: 07:00 to 19:00 – all activities. Any percussive piling works within 400m of residential properties will only occur for two periods of four hours (between 08:00 to 18:00) with at least one hour break between the two periods; b. Saturday: 09:00 to 13:00 – all activities, except percussive piling within 400m of residential properties; c. Saturday: 13:00 to 18:00 – all activities, except for HGV deliveries, works likely to generate substantial levels of noise (defines as activities generating more than 45dB LAeq at neighbouring dwellings), and percussive piling (unless agreed with the relevant local authority); and d. Sundays, Bank Holidays and outside of the construction hours noted above (including nights): no activities except for HDD drilling which could be required subject to the restrictions stated in the Framework CEMP **[REP1-031]**, future detailed CEMP(s) (which would be substantially in accordance with the framework plan, as secured via Requirement 12 of the Draft DCO **[APP016]**), and any other restrictions agreed with the relevant planning authorities pursuant to the consent process under section 61 of the Control of Pollution Act 1974. The Saturday hours are substantially more restricted than weekday hours and exclude high-noise activities during sensitive times to protect residential amenity. Restricting construction solely to weekdays or to winter months would significantly prolong the overall construction period without reducing the total amount of work required, resulting in a longer duration of potential disturbance for the local community. The construction phase for the Proposed Development is temporary and is anticipated to take 24 months if multiple construction teams are mobilised simultaneously, or 30 months if the Proposed Development is built out sequentially. As summarised in Chapter 16: Summary of Environmental Effects of the ES **[APP-041]**, the Proposed Development will not result in significant residual adverse effects with regards to noise during construction. Table 3.7 of the Framework CEMP **[REP1-031]** commits to a construction noise monitoring plan to help ensure that the predicted levels are not exceeded in practice. The CEMP also contains measures to ensure residents are not impacted by significant levels of vibration. The provision of a detailed CEMP, which will be substantially in accordance with the framework plan, is secured via Requirement 12 of Schedule 2 to the Draft DCO **[APP-016]**. The Applicant acknowledges concerns regarding dust and emissions from vehicles and machinery during construction. These potential impacts have been assessed in Chapter 14.2: Air Quality of the ES **[APP-039]**. With embedded and additional mitigation measures, including best-practice dust controls and the use of Non-Road Mobile Machinery (NRMM) meeting or exceeding Regulation (EU) 2016/1628 standards, significant adverse effects on health or local air quality are not expected. All mitigation measures, including the development and implementation of a Dust Management Plan (DMP) as part of the detailed CEMP, are secured in the Framework CEMP **[REP1-031]** (ref. AQ-C1) and will be monitored throughout the construction phase. The DMP may include monitoring of dust deposition, dust flux, real-time particulate matter continuous monitoring and/or visual inspections. A

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			detailed CEMP will be produced, to be substantially in accordance with the framework plan, as secured under Requirement 12 of the Draft DCO **[APP-016]**.
REP1-084	Community Impacts, Rural Amenity and the Cumulative Burden on Local Residents	8.2 Rural amenity will be significantly diminished Residents in the affected villages value: • Quiet rural lanes • Open countryside • Dark skies • Access to footpaths and bridleways • Agricultural landscapes The introduction of a 60-year industrial development, with fencing, security lighting, substations, and maintenance traffic, fundamentally alters this amenity. The ES does not adequately assess: • Loss of tranquillity • Changes to the character of local walking routes • Impacts on dark skies • The cumulative erosion of rural identity These are material considerations for the Examining Authority.	The Applicant's response to paragraph 8.2, bullet point 1 is provided within the above response to paragraph 8.1 (loss of tranquillity) of LAND's Written Representation. Visual impacts on the PRoW network have been considered in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The siting of solar PV panels and associated infrastructure seeks to minimise instances of development on both sides of PRoW. Fencing around the Order Limits will be a 'stock proof fence' (i.e., wooden posts and metal wire mesh) and will be up to 2m in height. Palisade fencing will only be utilised around the perimeter of the BESS compounds (Work No. 2 and 3), and the Onsite Substation (Work No. 4) and will be up to 2.5m in height and painted in a muted colour sympathetic to the surrounding environment. Where development is proposed adjacent to a PRoW, there will be a minimum offset of 10m from the centre line (minimum 20m total). Where development is proposed on both sides of a PRoW, sections of wider offsets reflecting local features, such as hedgerows, will be integrated to vary the extent of views experienced across the Principal Site, where practicable. These buffers are secured by Requirement 6: Detailed design approval as set out in the Draft DCO **[REP1-007]**. Additionally, as noted in the Framework LEMP **[AS-122]** (ref. paragraph 6.1.4), to be secured by Requirement 8 under Schedule 2 of the Draft DCO **[REP1-007]**, a permissive path network, totalling approximately 9.5km, will be implemented providing routes across the Principal Site and enhancing the recreational value of the Order Limits (see Figure 3-3 Proposed Permissive Path Plan of the ES **[AS-024]** and the Framework PRoWMP **[APP-195]** for further details). These will supplement the existing PRoW network, linking together existing walking routes, increasing connectivity and creating enhanced connections to surrounding villages. The proposed permissive path network has evolved following feedback at the statutory consultation stage, as explained in Chapter 4 Alternatives and Design Evolution of the ES **[APP-029]**, providing more effective linkages across the site. These permissive paths include: new connections around Cathedral Park; a new connection at Tunman Wood; a new connection at Thurlby; and a new circular route to the west of Bassingham. These permissive paths are secured in Requirement 17: Permissive paths and Requirement 8: Landscape and ecological management plan as set out in the Draft DCO **[REP1-007]** and secured in the Streets, Rights of Way and Access Plans **[AS-106]**. With regards to lighting, as secured within the Framework OEMP **[REP1-033]** (ref. LV-O3), the proposed operational lighting and CCTV has been designed to avoid adverse effects and minimise visual intrusion. The following mitigation has been embedded within the Proposed Development: • No areas of the Proposed Development will be continuously lit. • Operational lighting will be triggered by Passive Infra-red Detector (PID) systems, which will be installed around the perimeter of the Proposed Development. • Lighting will be directional with care to minimise potential for light spillage beyond the DCO Site particularly towards neighbouring properties, habitats, highways or waterways. • Lights installed will be of the minimum brightness and/or power rating capable of performing the desired function.

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			• Light fittings will be used to reduce the amount of light emitted above the horizontal (reduce upward lighting). • The lighting of the primary substation will be motion sensor triggered, that would operate from dusk. • Low level lighting on specific operational units will be triggered by motion sensors, from dusk. • The inward facing CCTV cameras will typically use night-vision technology and will not require additional lighting. The provision of a detailed OEMP, which is to be substantially in accordance with the framework plan, is secured via Requirement 13 of the Draft DCO **[REP1-007]**. The Applicant's response to paragraph 8.2, bullet point 4 is provided within the above response to paragraph 2.1 and 2.3 (industrialisation of the landscape) of LAND's Written Representation.
REP1-084	Community Impacts, Rural Amenity and the Cumulative Burden on Local Residents	8.3 The cable corridor affects multiple communities along its length The underground cable route passes close to several villages and rural properties. Even when buried, the corridor introduces: • Construction disturbance • Hedgerow removal • Footpath disruption • Long-term access requirements • Perceived industrialisation of the countryside The applicant has not provided a community-level assessment of these impacts, nor has it demonstrated meaningful engagement with corridor-side residents.	The Applicant's response to paragraph 8.3 is provided within the above response to paragraph 3.5 (cable corridor construction disturbance, hedgerow removal, footpath disruption and long-term access requirements), to paragraphs 2.1 and 2.3 (industrialisation of the landscape), and to paragraphs 4.1, 5.1-5.3 (consultation) of LAND's Written Representation.
REP1-084	Community Impacts, Rural Amenity and the Cumulative Burden on Local Residents	8.4 Heritage settings and historic landscapes are at risk Lincolnshire's villages contain listed buildings, conservation areas, and historic rural settings that rely on open agricultural landscapes for their character. The ES does not adequately assess: • The effect of the solar arrays on the setting of heritage assets • The impact of the cable corridor on historic field patterns • The cumulative effect of multiple NSIPs on heritage landscapes Heritage impacts cannot be considered in isolation; they must be understood cumulatively.	The Applicant would like to respond to the comment that the ES does not adequately assess the potential harm to cultural heritage. The Proposed Development has been designed taking into account heritage constraints. The design was informed by staged assessment work in order to remove or reduce potential impacts upon heritage assets, and reflects a proactive approach to identifying, assessing and mitigating impacts (please refer to Chapter 7: Cultural Heritage of the ES **[APP-032]**, and relevant Appendices, especially Appendix 7-B Cultural Heritage Desk Based Assessment **[APP-125]**, Appendix 7-D Detailed Heritage Asset Setting Assessment **[APP-127]**, and Appendix 7- E Historic Landscape Character Assessment **[APP-128]**), which detail the comprehensive level of assessment work undertaken). The Applicant would like to draw attention to the Appendix 7-D Detailed Heritage Asset Setting Assessment **[APP-127]**, which discusses in detail the potential effects of the Proposed Development upon designated heritage assets. As such, the Applicant is of the opinion that due regard has been given to the importance of understanding the significance of the cultural heritage resource and the potential impact of the Proposed Development upon this resource, and measures have been built into the process to ensure appropriate and proportionate mitigation is included. As noted in the Framework LEMP **[AS-122]** (ref. paragraphs 4.1.8 – 4.1.13), all solar PV panels and associated infrastructure have been sited within the existing field pattern, protecting existing vegetation, and maximising the natural screening provided by field boundary vegetation which will be supplemented with additional planting. With regards to the cable corridor, removal of existing hedgerow will only occur where access is required. These crossings will, wherever practical, be located at current field access locations or in areas where there are existing gaps in the hedgerow. The anticipated maximum extent of hedgerow removal required is illustrated in Figure 3-17 Maximum

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			Vegetation Removal Plan of the ES **[AS-029]**. The Grid Connection Cable will be installed using an open trench method requiring a 30m to 40m working width, including both the permanent installation area and temporary working area, with trench widths approximately 3m wide and up to 3m deep. Where other specific techniques are required, such as micro-tunnelling, boring, or HDD, wider working areas (up to 60m wide) may be required, for example to avoid a sensitive watercourse. In terms of installation, the three single-core cables will either be laid directly into trenches or into ducting that will be installed with the cables pulled through the ducting. It is anticipated that the cable temporary working area will be narrowed to approximately 10m where the cable passes through hedgerows and trees to reduce the loss of vegetation, where possible. New land drains 300mm either side of the cable trench (or repair of existing drains where relevant) within the Cable Corridor will be implemented - the only exception to this is at HDD locations, where the land drains would terminate. The Cable Corridor will be further refined during detailed design post consent of the DCO to take account of any unexpected, localised issues, including but not limited to archaeological finds, implications with respect to protected species and reducing impacts upon trees and hedgerows, for example. The Applicant is of the opinion that due regard has been given to the importance of understanding the cumulative impacts, as presented within Chapter 7 Cultural Heritage of the ES **[APP-032]** and Chapter 15 Cumulative Effects and Interactions of the ES **[APP-040]** in line with the EIA Regulations.
REP1-084	Community Impacts, Rural Amenity and the Cumulative Burden on Local Residents	8.5 Health and wellbeing impacts are understated The ES does not sufficiently address the wellbeing effects of: • Long-term construction disturbance • Loss of rural amenity • Increased traffic on narrow lanes • Perceived industrialisation of the local environment • Stress and uncertainty caused by multiple overlapping NSIPs For many residents, these impacts are not abstract — they affect daily life, mental wellbeing, and community cohesion.	It is acknowledged that energy infrastructure has the potential to impact on the health and wellbeing of the population and therefore, potential effects on human health are considered as part of the EIA process. Section 6.2 of the Planning Statement **[AS-098]** considers the effects of the Proposed Development on human health in the context of planning policy. With regards to disruption during the construction, operational and decommissioning phases, measures set out in the Framework CEMP **[REP1-031]**, Framework OEMP **[REP1-033]**, Framework DEMP **[REP1-035]** and Framework LEMP **[AS-122]** will reduce or avoid mental health related impacts. These include measures such as new planting to screen views and by reducing the amount of solar PV in Field 46 to avoid a significant visual effect from any residential dwellings during the operational lifetime of the Proposed Development. Once the Proposed Development is operational there will be approximately 9.5 km of new permissive paths created, as well as the provision of a 1.8ha (4.4 acres) new community orchard with open access within the landscaping designs, which can have a quality of life benefit for users through improving access to recreation. The framework management plans noted above are to be developed into detailed management plans, substantially in accordance with the respective frameworks, as secured under Requirements 12, 13, 20 and 8, respectively, of Schedule 2 to the Draft DCO **[REP1-007]**. With regards to rural amenity Chapter 13: Traffic and Transport of the ES **[APP-038]** considers the potential impacts upon PRoW and permissive paths, which are used for recreational purposes and therefore have an inherent health benefit, as well as a wellbeing aspect. The assessment also inherently considers the potential impact upon people, for example relating to congestion (driver delay), community severance, and fear and intimidation on the roads, which by their nature also affect stress and wellbeing, and therefore people's health. The Applicant's response to paragraph 8.2, bullet points 3 and 4 is provided within the above response to paragraph 8.1 (increased traffic on narrow lanes) and paragraph 2.1 and 2.3 (industrialisation of the landscape) of LAND's Written Representation.

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			With regards to stress and uncertainty, assessments relating to human health are included within the Environmental Statement. In line with the approach set out in the Scoping Opinion (Appendix 1-B: EIA Scoping Opinion of the ES **[APP-199]**), Chapter 5: EIA Methodology of the ES **[APP-030]** explains (ref. paragraph 5.1.11) that potential likely significant effects to human health are considered within the relevant ES technical chapters. This notes the following ES chapters: • Chapter 9: Water Environment **[REP1-021]**; • Chapter 10: Landscape and Visual Amenity **[AS-117]**; • Chapter 11: Noise and Vibration **[APP-036]**; • Chapter 13: Traffic and Transport **[APP-038]**; and • Chapter 14: Other Environmental Topics, Section 14.2: Air Quality **[APP-039]**. In line with the methodology set out in Chapter 5: EIA Methodology of the ES **[APP-030]** (ref. paragraph 5.9.12) and within the impact assessment methodology for each of the technical chapters as relevant, consideration is inherently given to human health receptors where relevant within each of the technical assessments. For example, noise and vibration, air quality and EMF assessments consider the potential for direct effects upon human receptors, and each of these have specific health limits/thresholds set for the protection of sensitive members of the population. Chapter 10: Landscape and Visual Amenity **[AS-117]** presents the findings of an assessment of the likely significant effects of the Proposed Development upon landscape character and visual amenity. Whilst this chapter does not specifically assess the effects on human health, the assessment considers the potential impacts upon the community and people, for example with regards to how the Proposed Development has the potential to affect their views and appreciation of the landscape. The Applicant recognises that some communities on other solar projects have highlighted that the visibility of solar farms will cause stress and wellbeing issues, with the LVIA focussed on assessing the severity of the change on visual amenity and landscape. With sufficient screening in place (as secured by the Framework LEMP **[AS-122]**) and good design, a solar farm should not impact a community's health or well-being. The LVIA also assessed the impact on views from PRoW, which is a recreational receptor that some users enjoy as part of stress-relief and exercise, and therefore considers where potential impacts have the potential to directly affect health. The water environment assessment considers human health with regards to the assessment of water quality (including its importance both for ecological receptors and human population), as well as consideration of flood risk, which inherently concerns the potential risk to local human receptors. Regarding mental health, the Applicant recognises that elements of the Proposed Development have the potential to affect mental health. To address such concerns and support the long-term wellbeing of the community, including mental health, the Proposed Development has been iteratively and holistically designed to minimise impacts on health and wellbeing through undertaking a comprehensive and robust Environmental Impact Assessment and consultation process to identify and implement beneficial design opportunities. Furthermore, Requirement 5 of Schedule 2 to the Draft DCO **[REP1-007]** secures the establishment of a Community Liaison Group (CLG) prior to commencement of the Proposed Development. It should be noted that the Applicant has already established this CLG with the initial meeting having taken place in April 2025. The CLG will continue throughout the construction of the Proposed Development, and by virtue of Requirement

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			5 of Schedule 2 to the Draft DCO **[REP1-007]**, will continue until the date of final commissioning of the Proposed Development, which will be the start of the operational phase. The CLG provides an opportunity for the local community to engage with the Applicant, learn about the detailed design process post-consent, express concerns, and be kept up to date. It is expected that the group will play an important role in helping to reduce and minimise stress and contribute to wellbeing. In addition, should the Proposed Development be granted consent, the Applicant will provide a community benefit fund providing a sum of £400 per MW per year of export capacity. This community benefit fund would be able to be utilised for local projects and causes, as determined by the local community. The Applicant believes those communities living closest to the Proposed Development should benefit from it – with these communities being best placed to determine what a 'community benefit' should be. The Applicant is currently investigating how a community benefit fund could be managed and delivered independently. Whilst the community benefit fund does not form part of the DCO Application, and therefore does not comprise a benefit in the context of the planning balance, it does comprise a benefit of the Proposed Development for the wider community. In the light of the fact that PINS has already determined that a standalone section on health impacts was not required within the ES, in the light of the assessment that is included within the ES and which does not identify any likely significant impact of the proposed development on human health and in the absence of the Council itself failing to identify any likely significant impact of the proposed development upon mental health, the Council's request for a mental health impact assessment is not considered to be proportionate or justified.
REP1-084	Community Impacts, Rural Amenity and the Cumulative Burden on Local Residents	8.6 The cumulative burden on Lincolnshire communities is not acknowledged Residents in the affected area are already facing: • Multiple solar NSIPs • Grid reinforcement projects • New substations • Cable corridors • Associated construction traffic The applicant has not assessed how this project adds to the cumulative burden on communities who have already been required to engage with numerous consultations and examinations. This is a significant omission.	The Applicant's response to paragraph 6.3 is provided within the above response to paragraph 6.4 (cumulative impacts), and to paragraph 5.1-5.4 (consultation) of LAND's Written Representation, and more thoroughly within the Consultation Report **[APP-023]** and Consultation Report Appendices **[APP-024]**.
REP1-084	Community Impacts, Rural Amenity and the Cumulative Burden on Local Residents	8.7 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide: • A comprehensive community impact assessment covering all affected villages • A cumulative assessment of community disruption across all relevant NSIPs • A detailed construction traffic management plan suitable for rural lanes • A full assessment of impacts on footpaths, bridleways and rural amenity • A heritage setting assessment that considers cumulative landscape change • Evidence-based analysis of health and wellbeing impacts Until these issues are addressed, the community impacts of Fosse Green cannot be properly understood or assessed.	The Applicant has provided this information as part of their DCO Application and directs LAND to the responses to paragraphs 8.1-8.6 of their Written Representation above.

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REP1-084	Environmental Risks: Drainage, Flooding, Water Environment, Biodiversity and Operational Disturbance	The Fosse Green Energy project presents a range of environmental risks that have not been fully assessed or robustly evidenced within the Environmental Statement. These risks include impacts on drainage and flood management, watercourses, biodiversity, ecological networks, and operational disturbance from noise and lighting. When combined with the cumulative effects of other NSIPs in Lincolnshire, these issues represent a significant environmental burden that has not been adequately addressed.	The Applicant has responded in further detail to each of these points in the rows below.
REP1-084	Environmental Risks: Drainage, Flooding, Water Environment, Biodiversity and Operational Disturbance	9.1 Drainage and flood risk assessments lack site-specific and cumulative detail The site lies within an area characterised by agricultural drainage systems, field ditches, and watercourses that are integral to local flood management. The ES does not provide: • Sufficient modelling of how large impermeable areas (panels, tracks, compounds) will alter runoff • Evidence that existing drainage networks can accommodate increased flows • Assessment of cumulative flood risk from multiple NSIPs altering hydrology in the region • Long-term monitoring or maintenance plans for drainage infrastructure over a 60-year period Given the increasing frequency of extreme rainfall events, the absence of robust hydrological modelling is a serious omission.	Appendix 9-C: Flood Risk Assessment of the ES **[REP1-023]** discusses flood risk from all sources for the Principal Site and the Cable Route Corridor. Paragraph 4.6.2 of Appendix 9-C: Flood Risk Assessment of the ES **[REP1-023]** notes the Proposed Development scenario does not increase flood risk elsewhere and, therefore, will result in no change to flood risk in line with national and local planning requirements. Section 4 of Appendix 9-C: Flood Risk Assessment of the ES **[REP1-023]** discusses fluvial and tidal flood risk in detail for the Proposed Development. Hydraulic fluvial modelling has been undertaken using the latest hydraulic model (2015) provided by the Environment Agency to facilitate assessment of flood risk to the Proposed Development, concluding tidal flood risk is low for the Proposed Development. The Boston barrier (the Grand Sluice) in Boston also acts as the Tidal limit for the River Witham, with a 1 in 300 year level of protection. Tidal influence from the River Trent does not impact the Proposed Development. An assessment of sea level rise has also been undertaken Section 4.4 of the Appendix 9-C: Flood Risk Assessment of the ES **[REP1-023]** for both the Upper Witham and River Trent catchments, with mitigation provided to ensure solar PV panels can remain operational in times of flood and that they do not increase flood risk elsewhere, when excluding the Boston Barrier defences for the Upper Witham assessment. A sequential approach has been taken in locating infrastructure to avoid areas of flood risk, in line with NPS EN- 1 and the National Planning Policy Framework. All proposed buildings/compound areas, substation, transformers stations, BESS and the majority of panels have been located outside of Flood Zones 2 and 3. The majority of the Principal Site is located within an area classified as Flood Zone 1 (Low Risk). Solar PV panels and mounting structures will not increase surface water risk as they do not alter the existing drainage regime. Flood risk from all sources within and surrounding the Order limits will remain unchanged with the embedded mitigation proposed. An outline drainage strategy, presented within Appendix 9-D: Framework SWDS of the ES **[REP1-025]**, has been prepared alongside the Flood Risk Assessment which sets out the approach to surface water management. The provision of a detailed SWDS, to be substantially in accordance with the Framework SWDS, is secured under Requirement 10 of Schedule 2 to the Draft DCO **[APP016]**, with all proposed drainage features maintained according to standard practice. Surface water runoff from new, impermeable, surfaces will be attenuated and drained to surface water bodies, either to watercourses, or in certain cases to ground where a watercourse is not present in the vicinity. Discharges to watercourses from new impermeable areas will be mitigated by restricting runoff rates to the greenfield rate Qbar (an estimation tool that estimates site runoff rates based on site characteristics using standard hydrological equations), for all design storm return periods, attenuating excess runoff within the Order limits; therefore, reducing surface water flood risk downstream.
REP1-084	Environmental Risks: Drainage, Flooding, Water Environment,	9.2 Impacts on watercourses and soil structure are understated The cable corridor and construction works involve deep trenching, soil displacement, and potential disturbance to watercourses and drainage channels. The ES does not adequately assess:	With regards to soil quality, the Proposed Development will result in benefits to soil resources. As set out in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**, while the Proposed Development is operational the soil resource within the Principal Site would remain under a perennial grass cover, before being returned to the

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	Biodiversity and Operational Disturbance	• Long-term soil compaction and reduced infiltration • Disruption to agricultural drainage systems • Risks of sedimentation and pollution during construction • The cumulative effect of multiple NSIPs on local hydrology These impacts can persist for decades and materially affect agricultural productivity and flood resilience.	landowners and available for its current use, although it will be the decision of the landowners as to how they use and manage the land, following decommissioning. This would provide multiple benefits to the soil, enhancing the functional capacity of the soil resources for future arable production. Furthermore, bare soil structures would not be vulnerable to wind and water erosion, there would be improved infiltration of rainwater reducing erosive surface water runoff, greater exploitation of subsoil by plant roots which improves drainage and loosens compacted soils, and the recovery of topsoil organic matter which would improve aggregate stability, water holding capacity and plant nutrient availability. It should be noted that the Proposed Development design secures a number of mitigation measures to reduce the possibility of impacts upon land, soils and groundwater in the unlikely event of a contamination incident, as well as to reduce the likelihood of such an incident occurring. For example, in the event of a contamination incident, any areas of contaminated gravel within the BESS or Onsite Substation compounds would be dug out and replaced. Prior to this, the gravel would be washed through to remove any contaminants, with runoff being caught by the basin. Measures such as this, are set out in Appendix 9-D: Framework SWDS of the ES **[REP1-025]** and will ensure that there will be no significant effects as the result of any contamination of surface water or groundwater. A detailed SWDS will be prepared, substantially in accordance with the framework plan, as secured by Requirement 10 of the Draft DCO **[APP016]**. With regards to the potential mobilisation of existing contaminants as a result of the Proposed Development, the Phase 1 Preliminary Risk Assessment (PRA) (ES Appendix 14-C) **[APP-170]**, states in Chapter 14 Conclusions in paragraph 14.1.1 that “The potential risks that have been identified from potential contaminated land have been assessed by the PRA as being very low to moderate / low”. It should be noted that the Framework CEMP **[REP1-031]** (ref. measure GC-C1), Framework OEMP **[REP1-033]** (ref. measure GC-O1), and Framework DEMP **[REP1-035]** (ref. measure GC-D1) secure appropriate mitigation in the event that contamination is identified, such as works stopping in the event that contamination is encountered and appropriate remediation measures which would be agreed with the appropriate authorities. Chapter 15 Cumulative Effects and Interactions **[APP-040]** presents the assessment of cumulative effects, including on ecology and habitat fragmentation. This lists the other solar NSIPs that have been considered alongside the Proposed Development and the resultant change in effects. Section 10 of ES Chapter 9 Water Environment **[REP1-021]** deals specifically with the cumulative effects on hydrology. It identifies no change on the residual effects associated with the Proposed Development when also considering the effects of other nearby cumulative schemes, and therefore no significant cumulative effects on hydrology.
REP1-084	Environmental Risks: Drainage, Flooding, Water Environment, Biodiversity and Operational Disturbance	9.3 Biodiversity assessments rely heavily on mitigation without demonstrating effectiveness The applicant proposes habitat creation and biodiversity net gain (BNG) measures, but: • The effectiveness of these measures over a 60-year period is not evidenced • The ES does not provide clear baselines for several ecological receptors • Hedgerow removal along the cable corridor is downplayed • Habitat fragmentation is not assessed cumulatively • Long-term management plans are not secured or detailed BNG cannot be assumed; it must be demonstrated.	Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]** sets out the biodiversity and ecological impact assessment. A broad suite of ecological surveys and investigations have been undertaken by the Applicant. The results of these surveys have been used to inform the ecological baseline of the Proposed Development and to be used in the development of any necessary mitigation measures. Surveys undertaken include: • Habitat and botanical surveys including both terrestrial and aquatic habitats. • Detailed surveys for protected and notable species, including great crested newts, reptiles, amphibians, breeding and wintering birds, bats, riparian mammals and terrestrial invertebrates.

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			It should be noted that the assessment presented in Chapter 8 Ecology and Nature Conservation of the ES **[REP1-019]** identified no significant adverse effects upon ecological receptors as a result of the construction, operation and decommissioning of the Proposed Development. Significant beneficial effects will be established during operation upon a variety of habitat types (including woodland, grassland and hedgerows), for example new hedgerow planting and bolstering of existing defunct hedgerows will increase connectivity across the Order Limits for species such as bats. Additional grassland and conservation margins provided adjacent to and beneath the solar PV panels in the Principal Site, and larger permanent grassland fields, including in arable field margin in retained arable fields, will increase the diversity of flora in comparison to existing intensive agriculture and provide new habitat niches to encourage fauna such as invertebrates and birds. Habitats such as woodland and hedgerows within, and surrounding, the Order Limits will be protected and buffered, wherever practicable, by a minimum of 15m from the Proposed Development. The buffer zones will be in accordance with British Standard Recommendations BS 5837:2012, as stated in the Framework CEMP **[REP1-031]**. These buffer zones will not only ensure protection, but in combination with the habitat creation proposed in the Framework LEMP **[AS-122]**, will allow regeneration / expansion of the woodland edges and hedgerows to provide additional habitat and linkages around the area. The development of a detailed CEMP and a detailed LEMP, to be substantially in accordance with the framework plans, is secured via Requirement 12 and Requirement 8 of Schedule 2 to the Draft DCO **[REP1-007]** respectively. Requirement 12 and 8 of the Draft DCO **[REP1-007]** includes LCC and the Environment Agency (amongst other statutory bodies) as prescribed consultees in respect of the final CEMP and LEMP. Habitat such as hedges and woodland used for nesting by birds will be retained and appropriately buffered to avoid disturbance. New habitat created as part of the Proposed Development, stated in the Framework LEMP **[AS-122]**, (such as grassland within and surrounding the solar panels, large open species rich grassland, new tree and hedge planting) will provide additional foraging resources. The mitigation provision for ground-nesting birds consists of 64ha (158.1 acres) of permanent grassland and a minimum of 181ha (447.3 acres) of retained arable. These areas are indicatively illustrated as Arable fields A to F on Figure 8-5: Bird Mitigation Land Allocation (Revision 2) of the ES **[AS-046]** but could be rotated within the areas of the Order Limits where there is no solar PV infrastructure, providing the principles for field sizes are achieved. The mitigation is secured in the Framework LEMP **[AS-122]**. Hedgerow removal is illustrated and secured in the Hedgerow Plan **[AS-112]**. During construction the retained vegetation will be protected. Measures to be employed will include the use of clearly defined stand-offs, managing the structure and integrity of the retained vegetation, and undertaking any pruning outside of the bird breeding season and in accordance with hedgerow regulations. Further detail of the management of existing habitat, and implementation, establishment and management of new habitat will be detailed in the detailed LEMP and CEMP to be developed during detailed design post-consent. The Proposed Development is reliant on a package of avoidance, mitigation and enhancement measures to address the ecological impacts as noted by LANDs. The Applicant has provided framework management plans as part of the DCO Application, which will be secured via the relevant Requirements in Schedule 2 of the Draft DCO **[REP1-007]**:

Ref. No.	Theme	Lincolnshire Against Needless Destruction Written Representation / Summary of Written Representation	Applicants Response to Lincolnshire Against Needless Destruction Written Representation
			- Framework CEMP **[REP1-031]** secured in Requirement 12; - Framework OEMP **[REP1-033]** secured in Requirement 13; - Framework SMP **[AS-100]** secured in Requirement 15; - Framework LEMP **[AS-122]** secured in Requirement 8; and - Framework DEMP **[REP1-035]** secured in Requirement 20. As this is a DCO application it is therefore not subject to mandatory BNG legislation. However, the Applicant has committed to deliver a minimum of 30% biodiversity net gain in habitat units, 50% biodiversity net gain in hedgerow units and 10% biodiversity net gain in watercourse units using DEFRA's Statutory Biodiversity Metric (SBM) (Version 1.0.4) for the Proposed Development. This is secured by Requirement 8 of Schedule 2 to the Draft DCO **[REP1-007]** which requires a detailed LEMP to be submitted and approved by the relevant planning authority prior to commencement of the authorised development, which must be substantially in accordance with the Framework LEMP, including details of how the plan will contribute to the achievement of the above mentioned minimum percentages during operation. The approved detailed LEMP must be implemented as approved throughout operation of the authorised development. The Framework LEMP **[AS-122]** includes detail on the relevant management/monitoring regimes to deliver BNG targets and monitor landscaping and ecological enhancements, which will be implemented as part of the detailed LEMP. The following is secured within the Framework LEMP **[AS-122]** (ref. paragraph 7.1.7) which will be carried through into the detailed LEMP: "A postconstruction monitoring programme will be formalised, agreed and included within the detailed LEMP. Walkover surveys of the DCO Site will be undertaken between April and June in years 2, 4, 6, 10 and then every 5 years post-construction until year 60. This monitoring will also be used for the purposes of BNG Condition Assessments that requires a 30-year management plan."
REP1-084	Environmental Risks: Drainage, Flooding, Water Environment, Biodiversity and Operational Disturbance	9.4 The project contributes to fragmentation of ecological networks The generating area, fencing, security infrastructure, and cable corridor create physical and functional barriers for wildlife. The ES does not fully assess: • Impacts on species movement • Loss of connectivity between habitats • Cumulative fragmentation from multiple NSIPs in the region Lincolnshire's ecological networks are already under pressure; this project adds to that burden	As described in Section 8.2 of Chapter 8: Ecology and Nature Conservation of the ES **[APP033]** the assessment of significant biodiversity effects of the Proposed Development has been conducted in line with the relevant ecological legislation, policy, and guidance as detailed within Appendix 8-A: Ecology Legislation, Planning Policy Context and Guidance **[APP-133]**. Chapter 8: Ecology and Nature Conservation of the ES **[APP033]** assesses the temporary and permanent loss, and fragmentation of all habitat types across the Order Limits, cropland, hedgerows, woodland, and Main Rivers. Chapter 8: Ecology and Nature Conservation of the ES **[APP033]** concludes that no significant adverse residual effects on ecology and nature conservation are predicted during the construction, operation or decommissioning of the Proposed Development. With regards to species movement to ensure impacts on mammals such as roe deer, muntjac deer, fox and badgers are minimised, all security perimeter fencing will include gaps to allow small/medium sized mammals (including deer) to pass underneath at strategic locations to maintain ecological connectivity, as secured within the Framework CEMP **[REP1-031]** (e.g. ref. ECO-C1). The final locations of these mammal passes will be determined following pre-commencement surveys. Existing hedgerows and wildlife corridors will also be retained outside of the security perimeter, to allow the continued movement of mammals across the landscape. Chapter 15 Cumulative Effects and Interactions **[APP-040]** presents the assessment of cumulative effects, including on ecology and habitat fragmentation. This lists the other solar NSIPs that have been considered alongside the Proposed Development and the resultant change in effects. There is no cumulative significant effects identified on ecology, where significant effects have not already been identified associated with the

Ref. No.	Theme	Lincolnshire Against Needless Destruction Written Representation / Summary of Written Representation	Applicants Response to Lincolnshire Against Needless Destruction Written Representation
			Proposed Development. It notes that "It is acknowledged that there may be the potential for beneficial Cumulative Effects associated with biodiversity net gain (BNG) across the county of Lincolnshire due to the number of solar projects in the county which would each be required to commit to at least 10% BNG from Spring 2026".
REP1-084	Environmental Risks: Drainage, Flooding, Water Environment, Biodiversity and Operational Disturbance	9.5 Noise, lighting and operational disturbance are under-assessed Operational impacts include: • Inverter and substation noise • Security lighting • Maintenance traffic • Disturbance to nocturnal species • Loss of dark skies for rural communities The ES does not provide sufficient modelling of noise propagation or lighting spill, nor does it assess cumulative operational disturbance from other nearby NSIPs.	Chapter 11: Noise and Vibration of the ES **[APP-036]** assesses the operational noise impacts of the Proposed Development. Results presented in Table 11-19 show that no properties are expected to be significantly adversely affected by the noise from the Proposed Development, including the inverters and substation transformers. Additionally, the noise model applies "moderate downwind conditions" at receptor points when calculating noise, which means that results have been calculated under reasonable worst-case meteorological conditions. The Framework OEMP **[REP1-033]** makes a commitment that the final operational noise levels from the Proposed Development will be no higher than those predicted in Chapter 11: Noise and Vibration of the ES **[APP-036]**; modelling will be undertaken at the detailed design phase (as secured by measure NV-01 of the Framework OEMP **[REP1-033]**) to confirm the noise levels at sensitive receptors will not exceed these thresholds. Production of a detailed OEMP, which is to be developed substantially in accordance with the Framework plan, will be secured under Requirement 13 of the Draft DCO **[REP1-007]**. Furthermore, Requirement 16 of the Draft DCO **[REP1-007]** ensures that the operational noise levels set out in Table 11-21 of Chapter 11: Noise and Vibration of the ES **[APP-036]** are to be complied with. Maintenance and operational traffic is assessed in Chapter 13 Traffic and Transport **[APP-038]** and Chapter 11 Noise and Vibration **[APP-036]**, including site wide repowering. The effects were demonstrated to be not significant. With regards to light pollution, as secured within the Framework OEMP **[REP1-033]** (ref. LV-O3), the proposed lighting for the Proposed Development has been designed to avoid light pollution and adverse effects. The Applicant has provided this information as part of their DCO Application and directs LAND to the responses to paragraphs 8.2 (light pollution) of their Written Representation above. Chapter 15 Cumulative Effects and Interactions **[APP-040]** presents the assessment of cumulative effects. This lists the other solar NSIPs that have been considered alongside the Proposed Development and the resultant change in effects. Within the majority of technical chapters, no likely significant effects have been identified through the Cumulative Effects assessment where they were not already predicted for the Proposed Development in isolation. Some significant cumulative effects during construction are anticipated on landscape and visual, where they have not been predicted to be significant for the Proposed Development in isolation. During operation (year 15) it is considered there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development. .
REP1-084	Environmental Risks: Drainage, Flooding, Water Environment, Biodiversity and Operational Disturbance	9.6 The 60-year operational period magnifies environmental risks A six-decade lifespan means: • Long-term soil degradation • Permanent changes to hydrology • Multi-generational ecological impacts • Ongoing operational disturbance • A need for management plans that extend far beyond typical planning horizons The applicant has not provided the level of detail required to justify such a long consent period.	The Applicant has provided this information as part of their DCO Application and directs LAND to the responses to paragraph 9.2 (soil degradation), paragraph 9.1 (hydrology), paragraph 9.4 (ecological impacts), paragraph 9.5 (operational disturbance), and paragraph 7.5 (management plans) of their Written Representation above.

Ref. No.	Theme	Lincolnshire Against Needless Destruction Written Representation / Summary of Written Representation	Applicants Response to Lincolnshire Against Needless Destruction Written Representation
REP1-084	Environmental Risks: Drainage, Flooding, Water Environment, Biodiversity and Operational Disturbance	9.7 Requested actions LAND respectfully requests that the Examining Authority require the applicant to provide: • Full hydrological modelling, including cumulative flood risk assessment • Detailed drainage and watercourse impact analysis • A complete ecological baseline and cumulative biodiversity assessment • Evidence-based justification for proposed mitigation and BNG measures • Noise and lighting modelling appropriate for a rural environment • Long-term environmental management plans suitable for a 60-year DCO Until these issues are addressed, the environmental risks of Fosse Green cannot be properly understood or assessed.	The Applicant has provided this information as part of their DCO Application and directs LAND to the responses to paragraphs 9.1-9.6 of their Written Representation above.
REP1-084	Compulsory Acquisition, Landowner Pressure and the Cumulative Burden Across Lincolnshire	The Fosse Green Energy application seeks extensive compulsory acquisition (CA) powers over land and rights across the generating area, cable corridor, and associated infrastructure. While CA is permitted under the Planning Act 2008, it must only be granted where the applicant demonstrates a clear, compelling case in the public interest, and where the extent of land sought is necessary and proportionate. LAND submits that the approach taken to land acquisition for Fosse Green — when viewed alongside the numerous other NSIPs in Lincolnshire also seeking CA powers — places an unacceptable cumulative burden on landowners, tenants, and rural communities. This burden includes significant stress, uncertainty, and pressure on individuals who are repeatedly told that failure to agree voluntarily will result in compulsory purchase regardless.	The Applicant has responded in further detail to each of these points in the rows below.
REP1-084	Compulsory Acquisition, Landowner Pressure and the Cumulative Burden Across Lincolnshire	10.1 The scale of CA powers sought is extensive and long-lasting The applicant seeks powers to acquire: • Freehold land • Permanent rights • Temporary possession • Access rights • Rights for the cable corridor • Rights associated with the new substation Given the 60-year operational period, these powers represent a multi-generational imposition on landowners and tenants.	The site selection process, as detailed in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**, sought to reduce the need for the use of compulsory acquisition powers. The availability of willing landowners was an important consideration and suitable landowners were approached by the Applicant to discuss inclusion of their landholdings into the Proposed Development. The Applicant now has 90% of the Principal Site under Option (1 remaining landowner) and 75% of the landowners within the Cable Corridor under Heads of Terms, being progressed to Option. The Applicant is seeking to secure the rest of the land for the Principal Site and Cable Corridor by way of voluntary agreement. The Applicant did not intend to cause undue concern among affected landowners by including compulsory acquisition powers within the DCO for the Proposed Development. In applications for Nationally Significant Infrastructure Projects (NSIPs) and similar developments, it is well established practice for applicants to seek compulsory acquisition powers in conjunction with pursuing voluntary agreements with landowners. This is to ensure that the Proposed Development can proceed if granted development consent. It is necessary for the Applicant to be granted the compulsory acquisition powers included in the Order so as to protect against a scenario whereby a voluntary agreement is not adhered to or otherwise is set aside, for example: (i) freehold owners of the land within the Order Limits (where agreement has been reached) do not grant a lease of the land in accordance with the terms of the completed option agreements; or (ii) the contracting party dies, is subject to divorce proceedings, or is declared insolvent. In those circumstances, it would be in the public interest for the Proposed Development to proceed and the interests in question effectively converted into a claim for compensation and is one of the reasons that compulsory acquisition powers are being sought alongside the Applicant seeking voluntary agreements with landowners. The Applicant also needs powers to extinguish and/or suspend rights and override easements and other rights in the Order Limits to the extent that they would conflict with the Proposed Development. In addition, it is necessary to include compulsory acquisition powers to enable the Applicant to deal with land within the Order Limits where, despite undertaking diligent enquiries, it has not been possible to identify ownership. Further details of the Applicant's approach to compulsory acquisition, including the justification for this is included in the Statement of Reasons **[APP-020]**.

Ref. No.	Theme	Lincolnshire Against Needless Destruction Written Representation / Summary of Written Representation	Applicants Response to Lincolnshire Against Needless Destruction Written Representation
			The land rights sought by the Applicant across the Order Limits are outlined in the Book of Reference **[AS-115]** submitted with the DCO Application. The Schedule of Negotiations and Powers Sought **[REP1-050]** sets out where the Applicant has obtained interests through voluntary agreement with the respective parties.
REP1-084	Compulsory Acquisition, Landowner Pressure and the Cumulative Burden Across Lincolnshire	10.2 Landowners face significant pressure to agree voluntarily under threat of CA Across multiple NSIPs in Lincolnshire, landowners report being told that: • “If you don’t sign voluntarily, it will be compulsory anyway.” • “You may as well agree now to avoid worse terms later.” • “The DCO will give us the powers regardless.” While such statements may reflect the legal reality of CA powers, they create a climate of pressure, fear, and inevitability that undermines the principle of voluntary negotiation. The Examining Authority cannot adjudicate on negotiation tactics, but it can consider whether the applicant has demonstrated: • Good-faith engagement • Proportionate use of CA powers • Genuine attempts to minimise land-take • Respect for the rights and wellbeing of affected individuals LAND submits that these tests have not been met.	The Applicant has provided this information as part of their DCO Application and directs LAND to the response to paragraphs 10.1 of their Written Representation above. The Applicant would highlight that they have sought to reduce the need for the use of Compulsory Acquisition powers and are in continued discussions with the affected landowners to agree voluntary agreements wherever possible and to rely on compulsory acquisition powers as a last resort only. The high proportion of the Proposed Development that is either under Option or under Heads of Terms is indicative that the Applicant’s voluntary agreements are attractive to local landowners.
REP1-084	Compulsory Acquisition, Landowner Pressure and the Cumulative Burden Across Lincolnshire	10.3 The cumulative burden of CA across Lincolnshire is unprecedented Fosse Green is not an isolated case. Multiple NSIPs across the county — solar farms, grid reinforcements, substations, and cable corridors — are simultaneously seeking compulsory acquisition powers. This creates: • Repeated pressure on the same landowners • Overlapping negotiations • Conflicting access demands • Long-term uncertainty about land use • A sense of being “surrounded” by infrastructure proposals The cumulative effect is material, even if each individual scheme claims its CA powers are justified.	The Principal Site is more than 5km from the nearest proposed NSIP solar development (Leoda Solar Farm) and therefore the likelihood of the Proposed Development requiring compulsory acquisition from the same landowners is low. The exception to this is at the proposed National Grid substation at Navenby which will connect Fosse Green Energy, Springwell Solar Farm and Leoda Solar Farm to the National Grid and therefore there is a likelihood that the Cable Corridor will overlap with landowners also impacted by these two NSIP solar developments. The Applicant is mindful of other developers in this area and the effects this may have on affected landowners.
REP1-084	Compulsory Acquisition, Landowner Pressure and the Cumulative Burden Across Lincolnshire	10.4 The psychological and wellbeing impacts on landowners are real and significant The ES does not address the human consequences of CA, including: • Stress and anxiety caused by prolonged uncertainty • Fear of losing family land or livelihoods • Strain on farming businesses already under pressure • Mental health impacts associated with repeated NSIP engagement • The emotional toll of facing compulsory purchase for the first time in a generation These impacts are not abstract. They affect real people, many of whom have lived and farmed in the area for decades.	The Applicant now has 90% of the Principal Site under Option (1 remaining land owner) and 75% of the landowners within the Cable Corridor under Heads of Terms, being progressed to Option. The Applicant is seeking to secure the rest of the land for the Principal Site and Cable Corridor by way of voluntary agreement. The Applicant did not intend to cause undue concern among affected landowners by including compulsory acquisition powers within the DCO for the Proposed Development. In applications for Nationally Significant Infrastructure Projects (NSIPs) and similar developments, it is well established practice for applicants to seek compulsory acquisition powers in conjunction with pursuing voluntary agreements with landowners. This is to ensure that the Proposed Development can proceed if granted development consent.
REP1-084	Compulsory Acquisition, Landowner Pressure and the Cumulative Burden Across Lincolnshire	10.5 The applicant has not demonstrated that CA powers are necessary or proportionate LAND submits that: • The extent of land sought is greater than necessary • Alternatives have not been fully explored • The cable corridor alignment has not been justified • The applicant has not demonstrated that voluntary agreements were pursued in good faith	Under section 122 of the Planning Act 2008, an Order which includes compulsory acquisition powers may be granted only if the conditions in sections 122(2) and 122(3) are met. The conditions to be met are that: • the land is required for the development to which the Order relates or is required to facilitate or is incidental to the development; and • there is a compelling case in the public interest for inclusion of powers of compulsory acquisition in the Order (section 122(3)). The Secretary of State must be persuaded that the public benefits from the compulsory acquisition will outweigh the

Ref. No.	Theme	Lincolnshire Against Needless Destruction Written Representation / Summary of Written Representation	Applicants Response to Lincolnshire Against Needless Destruction Written Representation
		• The cumulative CA burden across Lincolnshire has not been assessed Without this evidence, the “compelling case in the public interest” test is not met.	private loss suffered by those whose land is to be acquired. At paragraph 11, the CA Guidance states that there must be no doubt in the decision maker’s mind as to the purposes to which the land to be acquired is to be put. It should be demonstrated that the land is needed for the authorised development and that it is no more than is reasonably required for the Proposed Development. Any land that is incidental to or is required to facilitate the development should also be limited to that which is no more than reasonably necessary, and it should be made clear to the decision maker that this is the case. As set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]** a site of approximately 1,000 hectares (ha) (2,471 acres) is required, taking into account the necessary solar infrastructure, the need for land to provide environmental mitigation and the need to retain flexibility. 1,000 ha (2,471 acres) is the approximate land area (excluding the Grid Connection Corridor) required to support the Proposed Development. Of this land area, approximately 475 ha (1,174 acres) would comprise the energy generation hectarage. The Site Selection Report also considered the alternatives and modification to the Proposed Development to minimise the potential land take. Since the submission of the DCO Application the Applicant has considered the land required and further removed a small parcel of land near Thurlby from the Order Limits, which was shown as part of Change Request 1 **[AS-103]**, further demonstrating how the Applicant meets the test in section 122(2) of the Planning Act 2008. This is secured via the Works Plans **[AS-105]**, and other secured Plans, which have been submitted to the Examination as part of Change Request 1 **[AS-103]**. In meeting the conditions of Section 122(3), the Secretary of State must be satisfied that there is a compelling case for the Proposed Development and that the public benefits of the Proposed Development outweigh the harm to those whose land is compulsorily acquired. The Statement of Need **[APP-184]** and the Planning Statement **[AS-098]** set out the need for the Proposed Development. A summary of the need for the Proposed Development is set out below. Decarbonisation is a UK legal requirement and is of global significance. It cannot be allowed to fail, and urgent actions are required in the UK and abroad, to keep decarbonisation on track to limit global warming. Solar generation plays an important part in decarbonising the UK's electricity sector and is a key step towards the UK Government’s objective of reducing the carbon intensity of grid electricity to well below 50g CO2e/kWh by 2030, as described in its Clean Power 2030 Action Plan. It is acknowledged that the Cable Corridor may seem extensive at approximately 351 ha. However, as per Chapter 3: The Proposed Development of the ES **[REP1-015]**, the Design Approach Document **[APP-186]**, and the Proposed Development Parameters **[REP1-029]** the Order Limits submitted for the Cable Corridor is sufficiently wide that the final route for the cable laying can be micro-sited during detailed design. Once constructed, the cable itself will comprise a much smaller fraction of this. The Applicant has provided this information as part of their DCO Application and directs LAND to the responses to paragraphs 4.1-4.2 (alternatives) of their Written Representation above.
REP1-084	Compulsory Acquisition, Landowner Pressure and the Cumulative Burden Across Lincolnshire	10.6 Requested actions LAND respectfully requests that the Examining Authority require the applicant to: • Provide evidence of good-faith negotiation with landowners • Justify the extent of land and rights sought • Demonstrate that CA powers are necessary and proportionate • Assess the cumulative CA burden across Lincolnshire	The Applicant has provided this information as part of their DCO Application and directs LAND to the responses to paragraphs 10.1-10.5 of their Written Representation above. Health matters were scoped out of the EIA process, due to there being clearly no likely significant effects This was demonstrated in the EIA Scoping Report **[APP-118]** and agreed with in PINS’s Scoping Opinion **[APP-119]**. Within the latter PINS stated “The Inspectorate is content that a standalone ES chapter for Human Health is not required and agrees that this aspect can be scoped out”, whilst NKDC states “We agree that

Ref. No.	Theme	Lincolnshire Against Needless Destruction Written Representation / Summary of Written Representation	Applicants Response to Lincolnshire Against Needless Destruction Written Representation
		• Provide a wellbeing impact assessment for affected landowners • Explain how long-term uncertainty will be minimised	effects to human health as a result of the proposed development can be scoped out as long as reference is made where applicable through the findings of other assessments undertaken as part of the EIA process". The ES covers air quality **[APP-039]**, noise and vibration **[APP-036]**, traffic severance and fear **[APP-038]**, and electromagnetic forces **[APP-039]** in the relevant assessments, which applies to people using PRoW in the Site and living near to the Site. Chapter 12 Socio Economics and Land Use **[AS-016]** considers effects on recreational activities such as PRoW and the introduction of new permissive paths. These assessments confirm there are no significant effects on health or well being.

3.3 BPA/PRAX [REP1-087]

Table 3-3: Applicant's Responses to Written Submissions at Deadline 1 – Non-Statutory Organisations – BPA/PRAX

Ref. No.	Theme	BPA/PRAX Written Representation / Summary of Written Representation	Applicants Response to BPA/PRAX Written Representation
REP1-087	Objection to the Proposed Development	Although Prax do not object to the scheme in principle, Prax do object to the compulsory acquisition of both land and associated rights in their current form and reserves its position in terms of making further representations once further investigations have been carried out in order to: (a) assess the potential risks posed to the Pipeline and Prax's continued ability to operate access, repair, maintain and replace it; (b) guarantee that all necessary mitigation measures and land rights necessary to protect the Pipeline (and by extension the environment) from risk of harm over the short and long term, can be delivered by the Order; (c) ensure that the Project can be delivered safely vis a vis the Pipeline; and (d) ensure the integrity and safety of the Pipeline	The Applicant made submissions at CAH1 and in its Written Summaries of Oral Submissions **[REP1-045]** that it was in the process of undertaking the necessary risk assessment. The result of this assessment was shared with Prax on 29 January 2026 and the Applicant is awaiting a response from Prax in relation to these results.
REP1-087	Risk to Critical National Infrastructure	The Prax Pipeline is part of the pipeline network comprising Critical National Infrastructure, which has the ability to supply key end users including Heathrow and Gatwick Airports with. As such is it a key part of the National Fuel Security / Resilience matrix and therefore its continued safe an uninterrupted use operation and maintenance must be a key issue for this examination. To date Prax have received no crossing specific risk analysis or modelling in order to assess the potential for damage to be caused to the Pipeline by the Project particularly by reference to AC interference in particular (and we refer to the UKOPA guidance on this topic at PDA-004 and Fieldfisher's oral submissions at CAH1 in that regard).	The Applicant has now provided Prax with the requested AC interference study and further discussion will be held on the matter once Prax has reviewed the information provided.
REP1-087	Failure to Engage Meaningfully	Fieldfisher/Prax despite chasing regularly have still have only had one all parties call with the Applicant which was on 26 November 2025. Furthermore, despite requesting detailed crossing methodology and specifications since April 2023 (and which the Applicant promised to prioritise on 26 November 2025) no such information has to date been provided. In its submissions for CAH1 and ISH2 on 8 January the Examiners urged the parties to engage on these matters and the Applicant agreed to do so. The Applicant in its submission at CAH1 further confirmed that risk assessments were expected by 16 January 2026 and would be remitted to BPA/ Prax without delay thereafter. However, on 19 January 2026 the Applicant's solicitors confirmed they not yet received any safety or risk analysis data, which given timings of the Examination and the nature of the risk in question is extremely disappointing. Fieldfisher have asked the Applicant's solicitors to confirm the scope and exact nature of the risk analysis data to be provided (such that BPA / Prax are likely to be able to assess whether the information is likely to be sufficient to assess the likely risk to the Prax Pipeline) and a date by which the information will be received by BPA/Prax. To cross a high pressure liquid fuel line without adequate mitigation (long-and short term) in place would pose an intolerable safety risk to the Prax Pipeline and therefore by extension the Project, the public and the environment and we would therefore urge that this issue is given due weight in this Examination and by any future consideration by the Secretary of State. Prax will understandably need to reserve its position in terms of the position it takes vis a vis this objection if its concerns are not satisfactorily addressed. While BPA has been sent a draft statement of common ground ("SoCG") by the Applicant this cannot be meaningfully progressed until the parties are able to ascertain that the Project will not constitute an unacceptable health and safety risk to the Pipeline.	As submitted by the Applicant during the CAH1 and noted in the Written Summaries of Oral Submissions **[REP1-045]**, engagement between the Applicant and Prax commenced as early as October 2023, when the Applicant team had a meeting with Prax to provide the background on the Proposed Development, and initiate engagement. Additionally, a meeting was held in April 2025, during which further details of the proposed Cable Corridor were shared, so that Prax could highlight any concerns they might have regarding interaction with the pipeline. This was then followed up in June 2025 when shapefiles were provided to Prax showing the locations and design of the Proposed Development, particularly in relation to the proposed crossing of the pipeline so that Prax could consider the potential interactions. That is the engagement which has taken place in relation to the design information. In relation to the protective provisions, contact was made with Prax's lawyers in June 2025 to launch discussions, as the Applicant was fully aware that the generic protective provisions would not be sufficient to cover their interests. The Applicant has consistently made clear to Prax that bespoke protective provisions would be provided, even though they are not a statutory undertaker and do not benefit from the protection afforded by s127 of the PA 2008. It was explained that those negotiations in relation to protective provisions were not able to commence in June 2025 due to a lack of instruction of the part of Prax's solicitors. Negotiation on the protective provisions has stalled slightly, as it has been overtaken by the points made in relation to the potential risk to the pipeline. The Applicant has carried out the requested risk assessment and the result of this

Ref. No.	Theme	BPA/PRAX Written Representation / Summary of Written Representation	Applicants Response to BPA/PRAX Written Representation
			was shared with Prax on 29 January 2026. The Applicant is awaiting a response from Prax in relation to these results. Draft protective provisions will be shared with Prax as soon as possible after Deadline 2.
REP1-087	Order Limits	Until the necessary risk analysis and site-specific modelling has been carried out and mitigation works (or at least the general scope and extent thereof) has been agreed, the Applicant cannot guarantee that (a) mitigation will not, as the Applicant maintains, be required; (b) or that if mitigation is required that it can be delivered within Order limits and within Order powers as drafted (as part of the submissions following ISH2, Fieldfisher have supplied the Examining Authority with example wording of how this issue is proposed to be managed by NGET as part of the Norwich to Tilbury DCO (EN020027); or (c) construction and operation of the Project will not create an unacceptable risk to the safety and security of the Pipeline and its ability to supply fuel to key national stakeholders and to the public and the environment in the event of a breach.	The Applicant has now provided Prax with the requested AC interference study and further discussion will be held on the matter once Prax has reviewed the information provided.
REP1-087	Potentially defective Environmental Statement	Prax's position remains as set out RR-038 and as per Fieldfisher's oral submissions at CAH1. The crossing of the Pipeline and the potential risks flowing therefrom have not been addressed in the Environmental Statement as required by Regulations 4 and 5 and Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. If mitigation works are required and those mitigation works needed are outside the Order land and/or cannot be delivered safely then there is the risk of material harm and damage which has not been assessed in the Environmental Statement.	The Applicant has now provided Prax with the requested AC interference study and further discussion will be held on the matter once Prax has reviewed the information provided.
REP1-087	Timing and Route Fixation	BPA and Prax remain acutely concerned given the timings of the examination and the lack of safety analysis and mitigation planning to date that the DCO risks being sent for approval before these issues can be resolved. As set out in RR-038 if the Draft DCO is confirmed in its current form Prax may be prevented from accessing using and maintaining its pipeline in accordance with statutory and regulatory requirements and therefore not be in a position to operate it safely; and 6.2 Rather, rights in respect of installation and long term retention repair and replacement of land rights are needed in the DCO to benefit BPA/Prax.	As is mentioned above, the results of the AC interference study have now been shared with Prax. The protective provisions which the Applicant is seeking to negotiate with Prax will set out constraints on the exercise of the powers in the Order, with a view to safeguarding Prax's interests, whilst enabling the Proposed Development to proceed.
REP1-087		The crossing angle has now been set. In respect of our statements in RR-038 as to the incorrect plot interactions being listed in Book of Reference (AP-022) and the Statement of Reasons (APP-020), the Applicant is now in dialogue with BPA /Prax in respect thereof albeit the matter is not yet resolved. BPA/Prax remain of the view that there is insufficient engagement from the Applicant both in terms of assessing and mitigating risk to the Pipeline or engaging on protective provisions and collateral agreements and would urge urgent dialogue in that regard. BPA/Prax request that the DCO is not put forward for submission unless it contains provisions to confirm that: (a) the Project must not be constructed or energised in the vicinity of the Pipeline unless adequate mitigation is in place to keep the Pipeline safe in accordance with current industry and regulatory guidance including British Standards; and (b) that all necessary long- and short-term rights for Prax to retain use upkeep and maintain (a) the Pipeline and (b) said mitigation is in place.	The Applicant has undertaken the requested risk assessment and shared the results of these with Prax on 29 January 2026. As noted in the Written Summaries of Oral Submissions **[REP1-044 and REP1-045]**, the Applicant has previously made clear that any required mitigation and any response to damage that could be experienced will be addressed in the protective provisions that the Applicant is planning to include in the Order for the benefit of Prax. The Applicant has consistently made clear to Prax that bespoke protective provisions would be provided, even though they are not a statutory undertaker and do not benefit from the protection afforded by s127 of the PA 2008. Taking the numbered points in turn: (a) As has been mentioned in previous responses, the results of the AC interference study have demonstrated that, save for workers of the pipeline wearing appropriate personal protective equipment (PPE) and complying with relevant health and safety legislation, no further mitigation is required in order to keep the pipeline safe.

Ref. No.	Theme	BPA/PRAX Written Representation / Summary of Written Representation	Applicants Response to BPA/PRAX Written Representation
		As Prax is in the process of selling its assets all rights granted to it will need to benefit its successors in title and be capable of being assigned / novated. BPA and Prax continue to reserve the right to make further representations during the examination process.	(b) As noted above, the bespoke protective provisions drafted by the Applicant provide the necessary land rights to Prax, including provision for these to benefit successors in title. The Applicant is checking the position in relation to rights for monitoring equipment previously raised by Prax and will pick this point up separately with Prax. Draft protective provisions will be shared with Prax as soon as possible following Deadline 2.

3.4 Springwell Solar Action Group [REP1-089]

Table 3-4: Applicant's Responses to Non-Statutory Organisations – Springwell Solar Action Group

Ref. No.	Theme	Springwell Solar Action Group Written Submission / Summary of Written Submission	Applicants Response to Springwell Solar Action Group Written Submission
REP1-089	Scale of Development	Whilst we acknowledge that there has been minor adjustments to the project, the development remains colossal in scale. It would fundamentally transform a beautiful, quiet rural environment into an industrial power plant. Community feedback has been consistently ignored throughout this process	While the Proposed Development comprises infrastructure for solar energy generation and associated development (such as BESS), the land is not permanently changed to industrial use in land use planning terms, and it should be noted that the Proposed Development also includes a significant amount of retained arable land. The design of the Proposed Development has sought to minimise impacts upon agricultural land, as explained in the Design Approach Document **[APP-186]** which sets out the design vision and principles that were developed at an early stage to provide a framework for design evolution – Design Principle 2 as detailed in Section 3.9 of the Design Approach Document **[APP-186]**, relates to being sensitive to existing agricultural land. This has been achieved through the retention of a significant quantum of arable land within the Order Limits (the DCO commits to 181 ha (447.2 acres) of retained arable land in the Framework LEMP **[AS-122]**). This retained arable land (which comprises a significant proportion, approximately 116 ha (287 acres), of BMV agricultural land) within the Order Limits disperses the areas of solar PV array and affords ecological and economic benefits associated with nesting birds habitat and retained jobs. With regards to the scale of the Proposed Development, as detailed in the Statement of Need **[APP-184]** smaller scale solar schemes, are not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets for renewable energy generation and achieving net zero. The Government recognises in the overarching NPS for Energy (NPS EN-1) that large-scale solar is an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Proposed Development. The Applicant has sought to minimise landscape and visual impacts of the Proposed Development in its pursuit of securing good design as set out in the Design Approach Document **[APP-186]**.
REP1-089	Alternatives and Net Zero	Comment that current Net Zero targets are unachievable under the present approach and are already causing measurable harm to the UK's economic output and standard of living. There are sensible and balanced alternatives to increase energy production, including: • Solar on rooftops and brownfield sites • Offshore wind • Small Modular Nuclear Reactors (SMRs)	NPS EN-3 explains how projects such as the Proposed Development and this Application are required to meet the United Kingdom's Net Zero Targets. Solar forms an important part of a diverse portfolio of energy generating facilities that are required in the UK; which is recognised in NPS EN-1. The Statement of Need **[APP-184]** sets out the need case for the Proposed Development. In summary, electricity generation is identified as being a Critical National Priority and storage (such as BESS) is identified as having a key role to play in achieving net zero and therefore urgently needed to help meet the UK Government's energy objectives. If consented, the Proposed Development would contribute to achieving the UK's energy aims, as set out in both national policy and guidance. The status of the Proposed Development as a large-scale solar development with BESS will allow it to contribute to delivering a secure, reliable, and affordable supply of energy, while also meeting national decarbonisation targets. With regards to exploring the scope to utilise rooftops and non-agricultural land (such as brownfield sites) for development, Appendix A: Site Selection Report of the Planning Statement **[AS-098]** sets out how previously developed land was

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			considered. The brownfield land registers were consulted for land within the boundaries of NKDC, South Kesteven District Council, East Lindsey District Council, West Lindsey District Council and the City of Lincoln Council, which fell into the area of search. Three sites over 1 hectare (2.47 acres) were identified, however none of the sites was large enough to provide a viable land parcel of at least 40 ha (99 acres), therefore no individual brownfield site from the brownfield land registers provided an adequate area to facilitate a large-scale solar project over 50 MW. Furthermore, two of the three sites had planning permission for residential development or for residential/mixed use development. In addition, the potential alternative site, Hawdin's Wood, included areas of the former RAF Swinderby airfield, however given the site has been developed for a range of uses, it was not available for the purposes of the Proposed Development. NPS EN-1 (2024) explains that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar. Government's Clean Power 2030 Action Plan established capacity ranges for the deployment of wind, solar and other clean technologies to prioritise projects needed for 2030, while maintaining a robust pipeline beyond 2030, required to prepare GB for the rapid growth in power demand expected over the 2030s and 40s on the way to net zero. The capacity ranges confirm that it is government's strategy to support a multi-technology future energy system. The deployment of new capacities of other technologies including rooftop solar, onshore wind and nuclear power is required alongside the urgent deployment unprecedented capacities of large-scale solar. New capacity is urgently required to keep decarbonisation on track to limit global warming, while some technologies have long and uncertain lead times and therefore their contribution to decarbonisation in the 2030s, if at all, is not yet guaranteed. For example, the Government's 2035 FES-derived capacity range for nuclear power is 6GW, representing only a 0.1GW increase on the Government's estimate of installed nuclear capacity in 2024. By contrast, Paragraphs 2.10.13 and 2.10.14 of NPS EN-3 (2024) state that "Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation ... Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free". Further information is provided in the Statement of Need **[APP-184]**.
REP1-089	Financial Queries	As a community, we embrace sensible and proportionate change. This scheme is neither sensible nor proportionate. It is fundamentally designed to: A. Tick a climate change compliance box B. Generate significant financial gain for the landowner C. Provide guaranteed income for the applicant or future owners through increasingly questionable subsidy mechanisms. None of these outcomes benefits British consumers. Electricity prices continue to rise, and there are serious questions about whether schemes of this nature deliver any meaningful or efficient contribution towards Net Zero.	It should be noted that the Proposed Development directly relates to energy security and counteracting climate change. NPS EN-3 sets out specific policy for solar development, recognising solar as a Critical National Priority (CNP). Paragraph 2.10.9 of NPS EN-3 states that "The government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions by 2050. As such, solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector." Paragraph 2.10.10 of NPS EN-3 goes on to confirm that solar has an important role in delivering the government's goals for greater energy independence including those of the British Energy Security Strategy which sets out that the government expects a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW). The Government's view is that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be

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			composed predominantly of wind and solar (EN-1(2024) Para 3.3.20. Further, that solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation. They can be built quickly and, large-scale solar is now viable in some cases to deploy subsidy-free (EN-3(2024), Para 2.10.13-14). As such, solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector and has an important role in delivering the government's goals for greater energy independence (EN-3 Para 2.10.9-10) as well as protecting consumers from volatile prices and reducing the risk of physical interruptions to supply that might impact on essential services (EN-1(2024) Para 3.3.2).. Solar is one of the cheapest forms of electricity generation and in many cases can be developed subsidy free. The Proposed Development is not funded by, nor is it intended to be subsidised by, the Government. A Funding Statement **[AS-014]** was prepared and submitted with the DCO Application, which sets out the estimated current capital cost for the Proposed Development and the Proposed Development funding strategy, including confirmation that the Applicant has access to sufficient funds to implement the Proposed Development (including compulsory acquisition compensation costs). Fosse Green Energy Limited is a company registered in England and Wales with Companies House (Company number 13438725). It is owned by Windel Energy Ltd, a company registered in England and Wales, and Rugeley West Solar Limited, another company registered in England and Wales. Rugeley West Solar Limited is owned by CS UK Holdings III Limited which is part of Recurrent Energy which is a subsidiary of Canadian Solar Inc. Both companies have a strong UK presence, with over 100 Recurrent Energy employees located in the UK. It should be noted that the Proposed Development is intended to benefit the English ownership as well as the Canadian Solar investors – the Applicant will remain an English company during the operation of the Proposed Development. NPS EN-3 explains how projects such as the Proposed Development and this Application are required to meet the United Kingdom's Net Zero Targets.
REP1-089	Brownfield Land / NSIP Dispute	As of January 2026, there are approximately 29,977 hectares of available brownfield land across England—around 8.7–9% of total land area. Why has this developer simply looked at this location to provide a solution that is classed as a national infrastructure project they should be compelled to conduct a national site search. Furthermore, the amount of land being consumed for this reckless project should not be classed as a NSIP. Even on the applicants own optimistic calculations they claim it could only provide power for a maximum of 110,000 homes. This is not a National Significant number. The Clean Power 2030 Initiative reinforces the importance of strategic, brownfield led site selection and directly contradicts this application.	The Applicant has provided a response regarding brownfield land in the response to Springwell Solar Action Group's Written Representation themed "Alternatives and Net Zero" above. With regard to the land take required for the Proposed Development and comments on efficiency, the Applicant notes that solar technology has made significant advancements, with modern panels achieving high efficiency rates and continual improvements in performance. While solar power is more land intensive than nuclear or wind power it is cheaper to install, and less likely to have significant potential environmental effects. As detailed in Section 1.3 of the Planning Statement **[AS-098]** the Proposed Development is defined as a Nationally Significant Infrastructure Project (NSIP), as it consists of the construction of an onshore generating station in England with a capacity exceeding 50 megawatts (MW) in accordance with s14(1)(a), s15(1) and s15(2) of the PA 2008. Associated development and other ancillary works are also proposed as part of the Proposed Development and are included within the application for development consent. The NSIP and associated development are defined in Schedule 1 of the Draft Development Consent Order (DCO) **[REP1-007]** and explained in the Explanatory Memorandum to Draft DCO **[REP1-009]**

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REP1-089	Grid Connection	There is currently no Grid Connection. Fosse Green, like Springwell Solar, currently has no confirmed grid connection. Consent cannot reasonably be granted for a Nationally Significant Infrastructure Project that relies on a separate, unconsented substation application.	Whilst permission for the proposed National Grid substation near Navenby has not been granted, at the time of writing the application is due to be submitted to NKDC in early 2026, with a decision anticipated in Spring 2026 according to the National Grid website for the project. Section 3 of NPS EN-1 sets out that the government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and details why the government considers that the need for such infrastructure is urgent. Section 4.4 of Chapter 4: Alternatives and Design Evolution of the ES **[APP-029]** sets out the methodology adopted for the site selection process. Following a formal application to National Grid for a connection into the 400kV Overhead Line at Whisby, the Applicant was informed that this point of connection was not available and was instead offered and subsequently secured a point of connection at the proposed National Grid Substation near Navenby. Having secured land with willing landowners, and in recognition of the need to consider reasonable alternatives, the Applicant sought to assess the site against other potential alternative sites to ensure it was the most suitable taking into account operational requirements, national and local planning policy and planning and environmental constraints.
REP1-089	Energy Export	There are also serious concerns that energy generated would not serve UK consumers but instead be exported via interconnectors. This project will not reduce electricity bills.	It is noted that the Proposed Development itself will not directly lower local electricity prices as the energy generated by the Proposed Development will be distributed across the National Grid network where required – the Applicant does not have the power to dictate where National Grid distributes the electricity that will be generated and therefore cannot control whether it is used locally. From a network management point of view, where feasible, National Grid always aim to use electricity close to the source of generation to minimise system losses, but it may be distributed to other regions if there is a surplus of supply. However, it should be noted that the Applicant is committed to ensuring that the Proposed Development provides benefits beyond those of supporting the UK government's Net Zero ambitions, in order to deliver a positive impact for the local community. Employment opportunities and local spending are considered within Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** and the Framework ESSCP **[APP-197]** submitted with the DCO Application. Section 12.7 of ES Chapter 12 Socioeconomics and Land Use **[AS-016]**, concludes that during the construction phase of the Proposed Development there would be minor beneficial effects on employment and on gross value added, which taken together can be considered to be a positive economic impact for residents within a 60 minute-drive time of the Proposed Development.
REP1-089	Cumulative Impact on Agriculture and Tourism	We are deeply concerned about the cumulative impact of multiple energy projects currently under consideration across North Kesteven and wider Lincolnshire. Taken together, these developments will result in the loss of thousands of acres of prime farmland, permanently transforming the county into an industrial landscape. Many of these applications cannot even guarantee the outputs they claim to deliver. Lincolnshire relies heavily on agriculture and tourism. Approval of these projects will have devastating consequences for both sectors, impacting farming, allied rural trades, local employment, and training pathways. We also host a further education college that provides young people with a route into agriculture—a sector now being systematically destroyed by this reckless rush to Net Zero.	With regards to consideration of the potential cumulative impacts associated with the Proposed Development in combination with other solar farm proposals in the area, cumulative effects and interactions between the Proposed Development and other solar NSIPs are assessed in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. The cumulative effects assessment followed a staged approach and considered relevant developments and land allocations within a 10km radius from the Proposed Development. A wider county level study area was used for the cumulative effects assessment in relation to BMV Agricultural Land which considers other Solar NSIPs within the County of Lincolnshire. The short list of cumulative developments, inclusive of the relevant solar proposals in the area, has been agreed with both NKDC and LCC. This agreed short list of cumulative developments is provided in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. As set out in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** (ref. paragraph 12.10.15) estimates for the County of Lincolnshire, derived

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for previous NSIPs in Lincolnshire, estimate the proportion of BMV land to be in the order of 71%, based on extrapolation from available mapping. It is estimated that the solar NSIPs in Lincolnshire, together with the Proposed Development, account for approximately 1.4% of the BMV land in the County. Whilst there is a degree of uncertainty around this proportion it is indicative that the solar NSIPs represent a small proportion of BMV land in the County. The assessment concludes that the cumulative effect on agricultural land associated with the Proposed Development remains not significant when considered at the County level (i.e. no greater than the effect of the Proposed Development in isolation).

With regards to the loss of agricultural land, this has been carefully considered through the site selection process (as set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**) and also through the sensitive design of the Proposed Development in order to minimise the impact on BMV land and agricultural operations. Appendix A: Site Selection Report of the Planning Statement **[AS-098]** demonstrates how the Applicant assessed the site against other potential alternative sites to ensure it was the most suitable, taking into account operational requirements, national and local planning policy and planning and environmental constraints, including the consideration of the loss of BMV agricultural land.

With regards to the concerns relating to the potential for the Proposed Development to impact upon agricultural production, as considered in Chapter 12: Socio-Economics and Land Use **[AS-016]**, the agricultural land required for the Proposed Development represents approximately 0.09% of the total farmland within the East Midlands, and therefore constitutes a very small proportion of the regional agricultural resource. Moreover, research undertaken by the Applicant in 2024 indicates approximately 50% of the land within the proposed Principal Site is currently used for the cultivation of non-food crops. Of this, the majority (approximately 81%) is grown for use as fuels for carbon-intensive energy sources, rather than for direct human or animal consumption. As such, while the land is agricultural in character, its current use does not solely support food production. The Proposed Development would therefore result in a limited and proportionate change in land use, set against the wider regional context and the Proposed Development's contribution to cleaner energy generation.

There is 4.6ha of land that is classed as permanently lost, due to the proposed landscaping that the Applicant does not intend to remove during decommissioning. Of this 1.5ha is Grade 3a, BMV. The land under the solar panels constitutes a mix of Grade 3a (High sensitivity) and 3b (Medium sensitivity) land. The soil is still present (it is not displaced) and following implementation of good soil handling and construction methods the soil should maintain the same ALC or recover to this status. It would also still be available for sheep grazing under panels which itself is still a form of agricultural land use, although not arable. There is no discernible loss or reduction of soil functions or soil volumes that restrict the current farming activity. It is acknowledged that a farmer would not attempt to grow wheat or many other crops due to the obstacle that the solar infrastructure presents, however the soil would allow this if the panels were removed.

It should be noted that the Proposed Development recognises the need to allow current farming practices to continue. The Order Limits include areas of new grassland for bird mitigation and a significant portion of retained arable land (a minimum of 181ha (or 447.3 acres) of retained arable land is secured via the Framework LEMP **[AS-122]**, a detailed version of which is to be developed substantially in accordance with the Framework LEMP, as secured under

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			Requirement 8 of the Draft DCO), which provides mitigation for ground nesting birds whilst also allowing current farming practices to continue. This retained arable land includes approximately 116ha (286.6 acres) of Subgrade 3a BMV land. Furthermore, to minimise the impacts of the Proposed Development on BMV land, Chapter 12: Socio-Economic and Land Use of the ES **[AS-016]** (ref. paragraph 12.6.4) sets out embedded mitigation measures including the use of panels at a height which could support sheep grazing (which would allow for this land to remain in productive agricultural use), and capitalising on the opportunity to improve soil structure during the period of suspended agricultural activities throughout the operational phase of the Proposed Development. The Framework SMP **[REP1-037]** a detailed version of which is secured via Requirement 15 of the Draft DCO **[REP1-007]**, contains industry standard good practice mitigation measures to reduce impacts on soil which will ensure that the ALC grade will be unaltered through operation and decommissioning of the Proposed Development. With regards to potential impacts upon the rural economy, Section 12.7 of Chapter 12 Socio-economics and Land Use of the ES **[AS-016]**, concludes that during construction of the Proposed Development there would be minor beneficial effects on employment and on gross-value added, which taken together can be considered to be a positive economic impact for residents within a 60 minute-drive time of the Proposed Development during this stage. With regards to economic and other benefits, Chapter 12: Socio-Economics and Land Use of the ES **[AS016]** has considered the existing jobs supported by the agricultural land. As noted in paragraph 12.7.52 of this chapter, it has been confirmed by all landowners that no job losses are expected as a result of the removal of agricultural land. Chapter 12 Socio-economics and Land use of the ES **[AS-016]** includes an assessment of potential effects on tourism/recreation arising from the Proposed Development (ref. Section 12.7) comprising consideration of impacts on local accommodation facilities, recreational receptors and visitor attractions. Section 12.5 identifies the size of the visitor economy and recognises that the villages of Coleby, Bassingham, Navenby and Aubourn contain visitor and recreational attractions, and that there is also a network of Public Rights of Way (PRoWs) in the surrounding area which may be used by visitors. With due consideration given to other assessment findings set out in Chapter 10: Landscape and Visual Amenity **[AS-117]**, Chapter 11: Noise and Vibration **[APP-036]**, Chapter 13: Traffic and Transport **[APP-APP-038]** and Chapter 14: Other Environmental Topics (Section 14.2: Air Quality) **[APP-039]** as appropriate, the assessment in Section 12.7 concludes that overall the impact of the Proposed Development on tourism/recreation receptors is not significant during the construction/ decommissioning and operational phases. In respect of views from/for these receptors specifically, a Framework LEMP **[AS-122]** has been prepared to accompany the DCO application to provide visual mitigation. Section 12.7 of Chapter 12 Socio-economics and Land use of the ES **[AS-016]** also includes an assessment of potential effects on businesses arising from the Proposed Development. Taking into account the assessment findings presented in the ES Chapters set out above this assessment concludes that there would be no significant effect on local businesses during the construction/ decommissioning and operational phases.
REP1-089	PRoW and Landscape Impacts	We live in a stunning landscape, rich in wildlife and widely enjoyed by walkers, cyclists, runners, and horse riders through routes such as the Steeples and Stepping Out walks. Approval of this scheme would send a clear message that local people, wildlife, and	The Applicant recognises the amenity value of the site and its surroundings, in particular the importance of PRoWs to local residents, and has sought to enhance local connectivity through sensitive design. The Applicant has designed the

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		wellbeing do not matter. There is no reasonable assessment that can conclude this development will not have a devastating visual and landscape impact. Photomontages presented by the applicant rely on hedgerow screening without acknowledging that hedges take up to 10 years to establish. Notably, no equivalent visualisations are provided for the BESS compounds—raising concerns over deliberate omission.	Proposed Development to create links that integrate with existing and proposed routes to support cycling and pedestrian access to benefit local amenity value and will avoid the closure of PRoWs wherever practicably possible. Details are provided in the Framework PRoWMP **[APP-195]** a detailed version of which will be developed, substantially in accordance with the framework plan, as secured by Requirement 18 of Schedule 2 of the Draft DCO **[REP1-007]**. Potential impacts on Public Rights of Way are assessed in Chapter 12: Socio-economics and Land Use of the ES **[AS-016]**. There are 36 PRoW and seven permissive paths located within the Principal Site, as well as 26 PRoW which run alongside the Order Limits or are within close proximity to the Principal Site. Furthermore, there are five PRoW which could be impacted by the Cable Corridor. The Proposed Development would require the permanent diversion of three PRoW, with minimal changes in journey length experienced by users, and each of which is assessed to result in a negligible effect, which is considered not significant. Some PRoW may need to be temporarily closed to facilitate the safe construction of the Proposed Development. Where a PRoW is proposed for temporary closure, a diversion route has been proposed for the duration of the closure, with the original PRoW to be fully reinstated upon completion of the relevant works. The Streets, Rights of Way and Access Plans **[AS-106]** show each proposed temporary PRoW closure, as well as the corresponding proposed indicative location of temporary PRoW diversion. The Framework PRoWMP **[APP-195]** outlines how the Applicant will PRoW within the Order Limits to ensure they have been suitably considered and will continue to operate effectively throughout the construction, operation (including maintenance) and decommissioning of the Proposed Development. The Framework PRoWMP **[APP-195]** reviews both user safety and accessibility, during the complete life cycle of the Proposed Development, considering the potential interaction and impact on the PRoW associated with the construction works, as well as the day-to-day operation of the Proposed Development. Visual impacts on the PRoW network have been considered in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The siting of solar PV panels and associated infrastructure seeks to minimise instances of development on both sides of PRoW. Fencing around the Order Limits will be a 'stock proof fence' (i.e., wooden posts and metal wire mesh) and will be up to 2m in height. Palisade fencing will only be utilised around the perimeter of the BESS compounds (Work No. 2 and 3), and the Onsite Substation (Work No. 4) and will be up to 2.5m in height and painted in a muted colour sympathetic to the surrounding environment. Where development is proposed adjacent to a PRoW, there will be a minimum offset of 10m from the centre line (minimum 20m total). Where development is proposed on both sides of a PRoW, sections of wider offsets reflecting local features, such as hedgerows, will be integrated to vary the extent of views experienced across the Principal Site, where practicable. These buffers are secured by Requirement 6: Detailed design approval as set out in the Draft DCO **[REP1-007]**. Additionally, as noted in the Framework LEMP **[AS-122]** (ref. paragraph 6.1.4), to be secured by Requirement 8 and 17 under Schedule 2 of the Draft DCO **[REP1-007]**, a permissive path network, totalling approximately 9.5km, will be implemented providing routes across the Principal Site and enhancing the recreational value of the Order Limits (see Figure 3-3 Proposed Permissive Path Plan of the ES **[AS-**

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024] and the Framework PRoWMP **[APP-195]** for further details). These will supplement the existing PRoW network, linking together existing walking routes, increasing connectivity and creating enhanced connections to surrounding villages. The proposed permissive path network has evolved following feedback at the statutory consultation stage, as explained in Chapter 4 Alternatives and Design Evolution of the ES **[APP-029]**, providing more effective linkages across the site. These permissive paths include: new connections around Cathedral Park; a new connection at Tunman Wood; a new connection at Thurlby; and a new circular route to the west of Bassingham. These permissive paths are secured in Requirement 17: Permissive paths and Requirement 8: Landscape and ecological management plan as set out in the Draft DCO **[REP1-007]** and secured in the Streets, Rights of Way and Access Plans **[AS-106]**.

The Applicant has sought to minimise landscape and visual impacts of the Proposed Development, as set out in the Design Approach Document **[APP-186]**. The Applicant acknowledges that there would be some adverse effects on the landscape character and visual amenity resulting from the Proposed Development, as detailed within Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**, but considers that these would predominantly be in the short to medium term during construction and the early years of operation of the Proposed Development. There are no significant long term visual effects anticipated on residents of local villages as, by year 15 of operation, the proposed landscaping (see the Landscape Mitigation Plan provided in Appendix A of the Framework LEMP **[AS-122]**) would have matured such that views of solar PV infrastructure within the Order Limits would be screened. Photomontages (see ES Figure 10-10 Photomontages **[APP-097, AS-119]**) have been prepared to inform the visual assessment undertaken in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** - these photomontages demonstrate how the visual impact at relevant receptors reduces over time as the proposed landscaping matures.

The approach to defining the LVIA study area has been described within Appendix 10-B: Landscape and Visual Impact Assessment Methodology **[APP-149]** of this ES. This has also included the consideration of longer distance views, details of which are provided in Appendix 10-G Landscape and Visual Amenity Study Area Analysis **[APP-154]** of this ES.

Figure 10-9 Scoping Viewpoint Locations of the ES **[APP-096]** illustrates the location of selected viewpoints. Viewpoint 35b illustrates the view of the BESS from Grange Cottage. The scope of visual receptors and representative viewpoints was agreed with AAH Consultants on behalf of North Kesteven District Council and Lincolnshire County Council after extensive consultation, as detailed within Table 10-3 of Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. It was agreed that it was proportionate for the scope of photomontages to be primarily focussed on those viewpoints representative of people that are likely to experience significant effects at year 15, although photomontages previously prepared at PEIR stage have also been updated to demonstrate how the design has evolved. With reference to Figure 10-7: Zone of Theoretical Visibility - Barrier Earth with Viewpoint Locations **[AS-059]** the agreed scope of photomontages included Viewpoints 3, 11, 17, 22, 27, 29, 30, 32, 33, 34, and 35. In terms of the photomontage type with reference to LI TGN 06/19, it was agreed to prepare Type 3/4 photomontages at year 1 winter, year 15 winter and year 15 summer for the large majority of these. The exceptions being for Viewpoints 3, 22, 27 that are anticipated to not experience

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			significant effects at year 15, and so did not warrant a year 15 summer photomontage.
REP1-089	Ecology - Birds	The area supports migrating birds that rely on open countryside for feeding and breeding. There is clear evidence that birds mistake solar panels for water, resulting in fatalities. This, combined with fencing, CCTV, constant inverter noise, light pollution, and habitat loss, will severely damage biodiversity and community wellbeing.	The risk of collision between birds and solar panels was not raised as a concern by Natural England during statutory consultation and there is little conclusive evidence on the impacts of glint and glare from operational solar farms on birds. With regards to any potential 'lake effect', there is no direct evidence to substantiate the 'lake effect' hypothesis31 . Furthermore, a UK based evidence review of the impacts of solar farms on birds concluded that the collision risk posed by solar PV modules is low 32 As such, it is accepted industry practice that solar panel installation does not require a collision risk assessment. The maximum height of the solar PV panels will be 3.5m above ground level (at maximum tilt). In the context of existing vegetation in the landscape, e.g. hedgerows, trees and woodland, the solar PV panels will not cause a physical impediment to bird movements across the landscape. Equally, birds transiting across the landscape are doing so on a broad front, i.e., there are no topographical or geographical features in the landscape to 'funnel' or concentrate bird movements, therefore, the exposure time to any possible reflected polarised light (glint or glare) is extremely low and is not considered as part of the assessments presented in the Environmental Statement. As stated in Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]** as a first principal, the Proposed Development has sought to avoid important ecological features (IEFs) (such as designated sites, priority habitats and protected species) through shaping the design of the Proposed Development. Where this has not been practicable, then embedded mitigation measures have been added to form an integral, committed and deliverable part of the Proposed Development design that does not compromise standard construction practices, such as habitat creation and enhancement (for example, woodland planting, new hedgerows, natural regeneration areas and pond restoration). These mitigation measures are included within the Framework CEMP **[REP1-031]**, Framework OEMP **[REP1-033]** Framework DEMP **[REP1-035]** and Framework LEMP **[AS-122]**, detailed versions of which will be secured by Requirements 12, 13 and 20 of the Draft DCO **[REP1-007]**. With these proposed mitigation measures in place, no significant effects are anticipated on important ecological features and the Proposed Development has the potential to generate beneficial effects for a range of the IEFs. The proposed planting design is shown in Figure 7.15-1: Landscape Mitigation Plan within the Framework LEMP **[AS-122]**. Based on the indicative layout of the Principal Site, new planting would include, in addition to hedgerow enhancement, gapping up and infill planting, and grassland under the panels and along perimeter buffers.
REP1-089	Decommissioning	There are significant and unanswered questions surrounding the future of the land. Windel Energy and Recurrent Energy—more accurately described as Canadian Solar subsidiaries— are not farmers. It is highly unlikely they will own this development long-term. The probability is that the scheme will be sold on at substantial profit. • Who will be responsible for land restoration in 60 years? • Why is a 60-year consent being sought at all? • What verifiable evidence exists to support claims that no long-term damage will be done to the soil? The applicant has repeatedly claimed that the land will be returned to farming in its original condition. If that is genuinely the case, this must be written into the DCO, with a binding requirement for restoration to Best and Most Versatile agricultural land, with zero	The Proposed Development comprises a temporary installation and at the end of the operational lifetime of the Proposed Development, the infrastructure will be removed, and the land returned to landowners in accordance with the Framework DEMP **[REP1-035]**, a detailed version of which, to be substantially in accordance with the framework plan, is secured under Requirement 20 of the Draft DCO **[REP1-007]**. As stated in Section 4 of the Planning Statement **[AS-098]**, a 60-year time limited consent will maximise the renewable energy generation of the Proposed Development and allow for replacement of panels halfway through if there is a loss in output capacity. A 60-year time period also allows flexibility for technological advancements in PV arrays after a few decades, should it be available. Paragraph 2.10.150 of NPS EN-3 states that "The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important

Ref. No.	Theme	Springwell Solar Action Group Written Submission / Summary of Written Submission	Applicants Response to Springwell Solar Action Group Written Submission
		contamination. A clear enforcement and financial penalty mechanism must also be included.	consideration for the Secretary of State". It should be noted that the non-permanent and reversible nature of a solar NSIP with 60-year consent has also been acknowledged in the Secretary of State's decisions on the Tillbridge Solar Farm, Mallard Pass Solar Project, West Burton and Gate Burton Energy Parks DCOs, all of which have been granted consent. Regarding the return of the agricultural land to its original quality, the Framework SMP **[AS-100]** sets out the high standards of soil handling and management measures to be implemented (to be further detailed within the detailed SMP) which will ensure that the soil is protected and is able to revert back to its former condition. This includes the maintenance of soils and the implementation of a monitoring schedule to be undertaken and set out within the detailed SMP (ref. Section 6.9 of the Framework SMP **[AS-100]**). It should be noted that regardless of the phase or element of construction and decommissioning works being undertaken, the works will still need to adhere to the detailed management plans, which are required to be substantially in accordance with the Framework SMP **[AS-100]**, Framework CEMP **[REP1-031]** and Framework DEMP **[REP1-035]**, as secured by Requirements 15, 12 and 20 of Schedule 2 to the Draft DCO **[REP1-007]** respectively).
REP1-089	Loss of agricultural land	This proposal risks turning thousands of acres of high-quality farmland into a permanent brownfield industrial complex. There is significant concern around contamination from PFAS and heavy metals leaching from panels, cables, and associated infrastructure, compounded by the risks posed by Battery Energy Storage Systems (BESS). It is deeply concerning in 2026 to face the prospect of Lincolnshire farmland being covered with solar panels manufactured in China, potentially linked to Uyghur forced labour. The applicants should be required to publish a fully transparent supply chain, including panel and battery manufacturers. It is known that equivalent developers have sourced from companies such as . No equipment should be permitted if linked in any way to modern-day slavery. If consent is granted, the DCO must include explicit requirements for supply-chain transparency and, where possible, local sourcing—including UK-produced steel.	The Applicant has provided a response regarding brownfield land and decommissioning commitments in the response to Springwell Solar Action Group's Written Representations themed "Alternatives and Net Zero" and "Decommissioning' above. The supplier and make of solar PV panels that will be used for the Proposed Development has not yet been chosen – this approach is common for developments of this kind, as solar PV technologies are constantly evolving, and new efficiencies are developed regularly. However, it can be confirmed that any PV cells to be used will be PFAS-free, this is secured in the Proposed Development Parameters **[REP1-029]** by Requirement 6(2) of the Draft DCO **[REP1-007]**. Should the Applicant receive consent, it would carry out a comprehensive audit to identify the right solar PV panels for the Proposed Development. When doing so, the Applicant will treat the need to ensure an ethical supply chain with the utmost importance and is fully committed to the responsible and ethical procurement of all its equipment. A Framework Employment, Skills and Supply Chain Plan (ESSCP) **[APP-197]** was submitted as part of the DCO Application. The Applicant wishes to ensure the construction, operation and decommissioning of the Proposed Development is undertaken pursuant to an ethical procurement policy and has provided for this to be a legal obligation under the DCO. This will be achieved through the development of a detailed ESSCP, which will be substantially in accordance with the Framework ESSCP **[APP-197]** submitted with the DCO application, as secured under Requirement 19 in Schedule 2 of the Draft DCO **[REP1-007]**. The Framework ESSCP includes a commitment (ref. paragraph 3.4.8) that any qualifying supplier must participate in a modern slavery supplier due diligence exercise, and the supplier must publish annually a slavery and human trafficking statement that meets the statutory requirements of section 54 of the Modern Slavery Act 2015, whereby the supplier must pay and treat its workers in compliance with applicable employment laws and minimum wage requirements. Further details regarding ethical and environmental responsibilities are provided in the Framework ESSCP **[APP-197]**.

Ref. No.	Theme	Springwell Solar Action Group Written Submission / Summary of Written Submission	Applicants Response to Springwell Solar Action Group Written Submission
REP1-089	BESS Safety	Battery Storage and Risk BESS failures are not hypothetical. Incidents at Moss Landing (USA), Statera Energy (Essex), and Carnegie Road (Liverpool) demonstrate the real dangers. Industry experts acknowledge that BESS incidents are likely—the unknown variable is their scale. Risks include fire, toxic smoke, chemical leakage, groundwater contamination, and heavy metals such as lithium, cobalt, nickel, and manganese entering ecosystems. The applicant is putting all the risk on the local community and the local emergency services. There is no liabilities on the applicant. Who will be responsible for remediation? Expecting communities to simply "trust" developers is wholly unreasonable. History—from Grenfell to Bhopal to PFAS contamination in the USA—shows that large corporations often fail, with communities bearing the consequences. Why has this applicant and all other applicants not provided any visuals of what BESS facilities will look like? Once again they are not portraying an honest view on how this development will impact the visual aspect for the local community	With regards to battery safety, the centralised BESS is likely to be located approximately 300m (note a minimum commitment of 200m as set out in the Framework BSMP **[REP1-041]** (ref. paragraph 2.3.5)), from residential receptors which will avoid significant effects on nearby receptors in the unlikely event of a fire. Appendix 14-G: Unplanned Emissions Assessment **[APP-176]** assesses the impact of airborne chemicals and gases produced in the event of a BESS fire and shows that the dilution of gases and the distance from the BESS is sufficient to avoid any exceedances of airborne gas safety levels. There have been three (one during construction, two during operation) utility scale BESS fires in the UK to date, all of which were built prior to the current NFCC safety guidance. Further details are provided in the Applicant's Response to the Examining Authority's First Written Questions Appendix B: Response to ExA's Request for information on Historical BESS Fires. Furthermore, a variety of assessments have been carried out to address potential areas of risk from the BESS as detailed in the Environmental Statement **[APP-025 - APP-179]**, and the Proposed Development includes embedded design mitigation and protection measures to reduce fire/explosion risk, which are detailed in the Framework BSMP **[REP1-041]**. The BESS is designed so that there is sufficient distance between the cells to mitigate the risk of this spreading (to keep a fire isolated to a single cell (to the extent which it is possible to control this)). This layout has been developed in consultation with the LFRS and has taken account of guidance from the NFCC. the focus of the Framework BSMP is to prevent a fire occurring. The Framework BSMP **[REP1-041]** is to be developed into a detailed BSMP, substantially in accordance with the Framework Plan, secured under Requirement 7 (Battery safety management) of the Draft DCO **[REP1-007]**. It is noted that the LFRS are a named consultee on this Requirement, and as such the LFRS will have the opportunity to review the detailed BSMP prior to any approval. The Applicant has provided a response regarding the appearance of the BESS in the response to Springwell Solar Action Group's Written Representations themed "PRoW and Landscape Impacts" above. In addition, Section 3.3.33 to 3.3.41 of Chapter 3: The Proposed Development **[REP1-015]** provides a description of the BESS battery containers. The dimensions of the battery containers would measure up to 6.5m x 2.5m, and 3m in height (same for either distributed or centralised BESS arrangements). The battery containers have been spaced with a minimum 3m clearance from each other in the centralised BESS arrangement and with 6m spacing in the distributed BESS arrangement. The indicative centralised BESS arrangement is illustrated on Figure 3-5: Indicative Centralised BESS Layout of the ES **[APP-051]**

4. Applicant's Response to Written Representations at Deadline 1 – Local Authorities

4.1 North Kesteven District Council [REP1-057]

Table 4-1: Applicant's Responses to Local Authorities – North Kesteven District Council

Ref. No.	Theme	North Kesteven District Council Written Submission / Summary of Written Submission	Applicants Response to North Kesteven District Council Written Submission
REP1-057	Impacts on Best and Most Versatile (BMV) agricultural land	Comment raising uncertainty around different figures regarding land quality within the Principal Site provided in the submitted information: • Table 6 in the Agricultural Land Classification Report (APP-161) • Table 12-15 and paragraphs 12.5.12 and 12.5.13 of ES Chapter 12 (AS-016) • paragraph 3.2.1 of the Planning Statement (AS-098) • paragraph 3.1.3b of ES Chapter 3: The Proposed Development (AS-079). The Cable Corridor beyond the Principal Site has not been surveyed in detail to date, but broad scale mapping indicates that much of the route may have a similar overall balance of BMV to non-BMV land as the Principal Site, though there may be some areas of Grade 2 land encountered. The Council seeks clarification from the Applicant on the correct figures to be used.	The Applicant acknowledges that there is a discrepancy in the area of BMV land reported within Appendix 12-B: Agricultural Land Classification Report **[APP-161]** and Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**. As detailed within the disclaimer found on page 3 of Appendix 12-B: Agricultural Land Classification Report **[APP-161]**, this Report was produced in October 2024 based on a previous version of the Site boundary, and therefore figures may illustrate a Site boundary that differs to the Order Limits for which consent is being sought. As the Council points out, the Principal Site is 1,070ha (following the Change Application the Principal Site is 1,055 ha), not the 1,018.7ha stated in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**. The discrepancy is with land not available for survey east of the Onsite Substation (illustrated on Figure 12-5 **[AS-068]**), which was added to the Cable Corridor after the ALC survey. The area that was inaccessible / not surveyed within the Principal Site was 70ha rather than the 18.4ha noted in Chapter 12. This does not affect the other numbers in Chapter 12 or therefore the conclusions of the assessment. The Planning Statement **[AS-098]** and Chapter 3: The Proposed Development **[REP1-015]** report the correct size of the Principal Site as 1,070ha (however, this figure has reduced to 1,055ha following the Change Application). The area of BMV land reported (and subsequently assessed) in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** (i.e. 282.9ha (699 acres)) is correct, and as such this does not affect the findings and conclusions of the Appendix 12-B: Agricultural Land Classification Report **[APP-161]** or the Environmental Statement chapters that rely on it. A soil survey of a defined cable route is proposed post-consent (along with restoration to pre-construction condition of the soil resource) and is secured by the Framework Soil Management Plan (SMP) **[REP1-037]** (which is to be developed into a detailed SMP, substantially in accordance with the Framework Plan, secured under Requirement 15 (soil management plan) of the Draft DCO **[REP1-007]**).
REP1-057	Site Selection	Given the existing policy context for solar farms - in particular that set out in the National Policy Statements EN-1 and EN-3, and in Policy S67 of the CLLP in relation to agricultural land quality - it is considered that the selection of the application site has taken a generally reasonable approach to this constraint. The detailed land classification survey of the application site (see above) indicates that the proportion of the land to be used would be substantially lower than some other solar NSIP schemes which have been granted consent. Nevertheless, the Council remains concerned regarding the large quantities of agricultural land – including BMV – which solar farm developments are proposed to occupy for very lengthy periods of time. These concerns are not allayed by the uncertainties raised by the information on ALC data, as reported above.	The Applicant acknowledges this section of the WR prepared by NKDC and notes the conclusion that the selection of the application site has taken a reasonable approach. The Applicant has no further comment. The Applicant's response to NKDC's LIR presents more information on the BMV land and non-BMV land used by the Proposed Development, and the effect on food security. The use of farmland, the non-permanent and reversible nature of a solar NSIP with 60 year consent has been acknowledged in the Secretary of State's decisions on a number of solar NSIPs, such as Tillbridge Solar Farm, Mallard Pass Solar Project, West Burton and Gate Burton Energy Parks, which have all been granted consent. For example, the Secretary of State confirmed that the 60- year consent lifespan is considered 'temporary and reversible for the majority of the land' (paragraph 4.167 of the Gate Burton decision).
REP1-057	Scheme Design	There is a lack of clarity within the application documents regarding quantification of the areas of land within different agricultural land quality	With regards to the land take (and amount of BMV land) for each element of the Proposed Development, please see the table below. Please note that this calculation has been based on overlaying the illustrative

Ref. No.	Theme	North Kesteven District Council Written Submission / Summary of Written Submission	Applicants Response to North Kesteven District Council Written Submission
		grades which each element of the development would occupy (see further below, under 'Impacts'). It is not clear whether amendments to the scheme design could further reduce impacts on agriculture and soils by occupying less BMV with the main elements of the development. Subject to clarification from the Applicant on these points, the Council considers that the application appears to presents a scheme design which in general terms has had due regard to avoiding the use of BMV land as far as possible and seeking to strike a balance which also avoids other environmental constraints affecting the site, and is therefore largely in line with relevant national and local policy in this respect.	Proposed Development layout figure within the ES (Figure 3-2A **[AS-022]**) with the ALC classification figure within the ES (Figure 12-5 **[AS-068]**), and as such the total ALC areas may not exactly tally to the totals stated in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**. Please also note that the calculation in the table below does not account for all planting/habitat creation (e.g. new hedgerow), hence the discrepancy between the total area of BMV to be permanently lost in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** (i.e. 1.5ha), and that reported in the table below. Temporary losses are shaded light grey and permanent losses shaded darker grey for reference. ALC Area Grade 1 / Grade 2 / Grade 3a / Grade 3b / Grade 4 Access Tracks: 0 / 0 / 1.8 ha 4.3 acre / 3.9 ha 9.6 acre / 0 Solar PV Array area and Solar Stations: 0 / 0 / 122.9 ha 303.7 acre / 311.3 ha 769.2 acre / 0 Centralised BESS Compound: 0 / 0 / 0.72 ha 1.8 acre / 6.1 ha 15.1 acre / 0 Community Orchards: 0 / 0 / 0.62 ha 1.53 acre / 1.2 ha 3.0 acre / 0 Proposed Belt of Trees: 0 / 0 / 0 / 0.34 ha 0.8 acre / 0 Retained Arable and Grassland: 0 / 0 / 116.3 ha 287.4 acre / 191.7 ha 473.7 acre / 0 Proposed Species Rich Grassland: 0 / 0 / 0 / 3.5 ha 8.6 acre / 0 Bird Mitigation Area - Permanent Grassland: 0 / 0 / 5.6 ha 13.8 acre / 58.9 ha 145.5 acre / 0 Bird Mitigation Area - Managed Arable: 0 / 0 / 34.1 ha 84.3 acre / 122.6 ha 303.0 acre / 0 The design of the Proposed Development has been subject to iterative refinement to minimise impacts on agricultural land and soils, including the avoidance and reduction of BMV land where reasonably practicable. It is considered that the current layout reflects the maximum achievable mitigation having regard to site constraints, technical requirements, and operational needs.
REP1-057	Agricultural and Soil Impacts	Comment seeks clarification on the quantify of land falling within different ALC grades for: solar arrays; solar stations; BESS; on site substation; other centralised plant and equipment; inter-connecting cable routes; tracks / access works; and distinction for each of the above as regards those parts which will be "sealed over" for the duration of the development, and those which will not. This will enable a clearer picture to be provided as to where the impacts of the development sit within the IEMA/ISEP guidelines say that the permanent sealing of land above 20ha (including temporary development where there would be a reduction in soil quality) is a major adverse (significant) effect. Clarity should also be provided regarding the potential use of areas of land within the site which are neither proposed for infrastructure (solar arrays, substation etc), nor for specific biodiversity mitigation.	Please see the table within the response above with regards to the areas of BMV occupied by the respective elements of the Proposed Development. The Proposed Development does not require the permanent sealing of more than 20ha of land. The majority of the Site will remain grassed; permanent sealing is limited to concrete foundations for the infrastructure within the Onsite Substation, BESS, and Solar Stations. All the construction is reversible and the land will be restored upon decommissioning.

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REP1-057	Agricultural and Soil Impacts	Concerns regarding the cumulative impact on BMV of a series of solar farm proposals on agriculture and BMV also remain, as it is considered that the applicant has down-played this potential – including through not reviewing cumulative effects at the County-wide scale (see AS-016, paragraph 12.7.43).	The cumulative assessment presented within Chapter 12: Socio-economics and Land Use **[AS-016]**, identifies the relevant solar NSIP developments, at various project stages, within Lincolnshire and assesses the use of BMV land and expresses it as a proportion of agricultural land at the County Level. The cumulative assessment focuses on the County level and considers all solar NSIPs within the County of Lincolnshire, presenting the best available information on BMV land take for each solar NSIP. The reference to the percentage of farmland occupied by the Principal Site within the East Midlands is provided for contextual purposes in the ES Chapter. The Applicant advises that the County-wide proportion of Lincolnshire farmland identified for NSIP solar proposals, at various project stages, is approximately 1.4% of BMV land and 2.9% of all farmland in the County. ES Chapter 12 **[AS-016]** identifies this as not significant Table 12-29 of Chapter 12 Socio-economics and Land Use **[AS-016]** shows that the effect on agricultural land, including BMV, across the County is likely to remain minimal, as it comprises only a small fraction of agricultural land. Therefore, the cumulative effect on agricultural land associated with the Proposed Development remains not significant when considered at the County level. This is no greater than the effect of the Proposed Development in isolation.
REP1-057	Agricultural and Soil Mitigation	To ensure that potential damage to soils is minimised, and post-operation decommissioning is successful in returning the land to productive agricultural use (including BMV quality), it is considered important for the applicant to commit in the submitted Framework Soil Management Plan (FSMP, AS-100) and other management plans to the following: a. engaging an appropriately experienced soil specialist to be present on site to advise on, and supervise soil handling. b. carrying out suitable base-line surveys of each part of the site in advance of development in that area - in accordance with best practice, in line with accepted soil health standards. An example list of soil health factors which might be included in such a pre-entry soil condition survey is included at Appendix A to this LIR c. conservation grazing of the solar array areas could potentially provide both some degree of mitigation for impacts on agriculture and offer biodiversity benefits	The Framework Soil Management Plan **[REP1-037]** states in Paragraph 5.2.1 that “A site representative shall be appointed to be the person responsible for the management of on-site practices to ensure the implementation of the SMP and any associated SWMP or MMP. This person shall be a suitably qualified and experienced soil scientist or practitioner” The Applicant has committed within Paragraph 7.2.2 of the Framework SMP **[REP1-037]** to further Agricultural Land Classification (ALC) surveys - soil surveys across remaining areas of the site red line boundary: including the cable corridor previously inaccessible areas and compound locations etc. Sample density must be in accordance with relevant ALC guidance, i.e. one sample per 100m of linear route or 1 per hectare of site area and undertaken by suitably qualified soil surveys in accordance with the BSSS guidance. It also commits to Geo-environmental intrusive (Phase 2) investigation – obtain soil samples for relevant chemical testing. The Applicant intends to introduce sheep grazing as a form of grass management, but cannot commit to this at this stage (and therefore has not assessed this in the ES), until such time that graziers can be approached after consent. The Environmental Statement has assessed the effects of the Proposed Development on the basis of the worst-case scenario, without reliance on grazing as a mitigation measure. The assessment presented in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**, and elsewhere in the ES, does not depend on grazing to mitigate impacts on agriculture or to deliver biodiversity benefits. Should grazing be implemented post-consent, it would represent an additional benefit rather than mitigation relied upon as part of the Proposed Development.
REP1-057	Agriculture and Soils Conclusions	It is possible that the outstanding concerns regarding negative effects on agriculture and BMV land identified in the LIR may be partly or wholly overcome if the applicant provides the clarifications and commitments set out above. However, currently the criteria of CLLP policy S67 have not all yet been met in full. In relation to conservation grazing we note that the applicant has confirmed that they are not yet formally committing to such an arrangement post-consent. This was confirmed orally at the recent ISH. Consistent with our approach in relation to other NSIP scale solar farms in North Kesteven	The Applicant refers NKDC to the clarifications and commitments provided above in response to the Council's view as set out in the Written Representation. It is hoped that these responses will assist the Council in resolving its outstanding concerns regarding effects on agriculture and BMV land and in concluding that the requirements of CLLP Policy S67 are met. The Applicant reaffirms the position on grazing as confirmed at the January ISH. Sheep grazing is the Applicant’s preferred method of grassland management; however, it is not possible to commit to this at the current stage and it has therefore not been assessed within the ES, which has therefore adopted a reasonable worst case scenario. Any grazing arrangements would be progressed post-consent, during construction, once appropriate local landowners or graziers (including, where relevant, established grazier

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		District, our position is that mitigation should be developed in line with 'BRE (2014) Agricultural Good Practice Guidance for Solar Farms' including the grazing densities set out under the sub-heading of 'Agricultural grazing for maximum production'. We would encourage the applicant to seek, and evidence, a contract with a grazier and to set out further principles for interested parties' review in subsequent updates to the Framework Soil Management Plan and Framework Landscape and Ecological Management Plan as necessary.	coordination services working with solar developments) can be engaged and contractual arrangements agreed. The Framework Operational Environmental Management Plan **[REP1-031]** allows for the flexibility to deliver management of the grass using grazing.
REP1-057	Landscape General Comments	AHH are satisfied with the scope and approach of the submitted assessments. Remaining concerns relate largely to judgements on findings, including: • Clarification on the assumed screen planting growth rates, and whether these allow for failures – this may affect the efficacy of mitigation for landscape and visual impacts • lack of recognition of potential adverse effects of using tall hedgerows as screening • the need for additional information on the effects of necessary periodic and large scale / wholesale equipment replacement.	Responses relating to the items raised by AAH in their review are provided below.
REP1-057	Landscape Character Impacts	The submitted LVIA (APP-035) identifies a range of significant adverse effects on landscape character of the Principle Site and Cable Corridor, as well as national and regional landscape character areas at the construction stage. These effects are assessed to have reduced substantially by year 1 of the operational stage. However, even by Year 15 when the screen planting is expected to be fully effective, there remain moderate adverse (significant) adverse effects on the area of the Principle Site, and on Local Landscape Character Areas LLCA 03: Tunman Hill and LLCA 08: Thurlby Fenland. AAH also consider that the land use change would result in residual moderate adverse (significant) effects across all areas directly affected by the development.	In response to the suggestion that all landscape character areas directly affected by the Proposed Development would have residual significant effects, the Applicant suggests that this fails to consider the extent to which the land within the Order Limits currently contributes to the wider character area and the extent to which it would change as a result of the Proposed Development at different stages. A more detailed response on Landscape Character Impacts is provided within the **Applicant's Response to Local Impact Reports [EN010154/EXAM/9.10].**
REP1-057	Visual Impacts	Comment raises concerns that significant adverse visual effects are predicted to remain well into the operational phase (including some throughout the 60 year duration) of the development, including for users of footpaths and roads which form part of three Stepping Out Walks (discussed later in this LIR). There is concern that the assessment relies on estimated screen planting growth – it is not clear that the proposals make sufficient allowance for failures and the need for replanting. In addition, there is also concern that some of this screen planting itself may cause adverse visual effects by blocking or foreshortening currently open, relatively uninterrupted views – thereby appearing out of place in what is otherwise an open landscape.	The Applicant considers that a plant growth rate of 33cm per year is a fairly conservative assumption. The Framework LEMP **[REP1-039]** is to be developed into a detailed LEMP, substantially in accordance with the Framework Plan, secured under Requirement 8 of the Draft DCO **[REP1-007].** As such, the measures outlined in the Framework LEMP **[REP1-039]** will allow for the successful implementation of the landscape mitigation. For clarity, the Framework LEMP has been updated and will be submitted to the Examination at the next available deadline to include clarifications on the length of time covered by the management plan, as well as the provisions for replacement planting. Regarding the concern that some of this screen planting itself may cause adverse visual effects by blocking or foreshortening currently open views; it has been assumed as stated in the LIR report this specifically relates to the presumed maintenance of hedgerows at 3m in height. For clarity, the Applicant is not proposing to manage all hedgerows at 3m across the whole Order Limits. The Framework LEMP **[REP1-039]** notes (ref. paragraph 5.3.13) that where screening is not the primary purpose of a proposed hedgerow, for example where the embedded setback is considered sufficient to reduce the level of effect such that it is not significant in EIA terms, the hedgerows will be maintained at 3m or lower to maintain open views of the countryside.

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REP1-057	Cumulative Landscape and Visual Effects	AAH take issue with the findings of the submitted LVIA (APP-035) in respect of cumulative impacts with the four other NSIP solar farm proposals in the area which are at various stages of the DCO process: Springwell Solar, Great North Road Solar and Biodiversity Park, One Earth Solar Farm, and Leoda Solar Farm Ltd. AAH's view is that the landscape character of the local, and potentially regional area, may be completely altered over the operational period – changing from a predominantly agricultural landscape to one which is characterised by a mix of agriculture and renewable energy infrastructure. This would be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing repeated views and presence of large scale solar.	The approach to assessing cumulative landscape and visual effects is consistent with PINS Guidance on Cumulative Effects and follows a proportionate methodology as outlined in GLVIA3. In Landscape Technical Memo 3 (November 2024) contained at Appendix A of NKDC's LIR **[REP1-056]** AAH welcomed this approach and accepted its robustness and appropriateness in assessing the cumulative effects on landscape and visual amenity. The cumulative assessment contained in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** primarily focusses on the cumulative schemes within the 2km Zone of Influence (ZoI), as this was judged to be the geographic area across which landscape and visual effects were most likely to occur, although the nearest NSIP scale solar schemes beyond 2km were also scoped in given their similar scale and typology to the Proposed Development. This is noted in Appendix A of NKDC's LIR **[REP1-056]** within AAH's Landscape and Visual Review (November 2025) as an appropriate approach. Furthermore, negligible residual effects noted within the standalone assessment of the Proposed Development were excluded from the cumulative assessment as, by virtue of their definition, they are considered to be imperceptible and are unlikely to lead to a significant in-combination effect. As set out in the detailed assessment of landscape effects provided at Appendix 10-E: Landscape Assessment of the ES **[APP-152],** no regional landscape character areas were identified as likely to experience more than negligible residual effects due to the anticipated scale of changes being perceived over a very small geographic extent in relation to the regional character areas or not being perceived at all and were therefore not considered further as part of the cumulative assessment. The potential for significant cumulative landscape and visual effects of other NSIP scale solar schemes at greater distances from the Proposed Development has also been considered within the Joint Interrelationship Reports prepared for the respective examinations of such schemes, including, Springwell Solar Farm **[EN010149],** Tillbridge Solar Project **[EN010142],** West Burton Solar Project **[EN010132],** and Cottam Solar Project **[EN010133]**. These found that given the notable distances and lack of intervisibility between these schemes and the Proposed Development, there was no potential for significant cumulative effects. It is therefore the Applicant's view that the previous examination reports further support the conclusion that significant cumulative effects on landscape and visual receptors resulting from the Proposed Development and other schemes beyond the 2km ZoI are unlikely.
REP1-057	Residential Visual Amenity	The LVIA (APP-035) finds that during construction a total of 17 residential receptors assessed (including groups of houses) would experience significant adverse visual effects (2 major, and 15 moderate); reducing to 2 at Year 1 of operation (Housham Wood Farm, Church Farm and Low Barn), with none at Year 15 of operation, when screen planting is expected to have matured. Although AAH agree it is unlikely any of the 29 residential receptors assessed in the LVIA (APP-035) would reach the recognised Residential Visual Amenity Threshold, these findings – together with the concerns expressed about the reliance placed on successful screen planting referred to above - are of concern to the Council. As AAH recommend, the Council considers that these effects and the potential to reduce residential amenity impacts even further – possibly through design changes and additional planting – should be explored through the examination's scrutiny of the application.	The Applicant's approach to assessing Residential Visual Amenity is provided at Section 1.5 of Appendix 10-B: LVIA Methodology of the ES **[APP-149].** This explains that the iterative design process has sought to embed mitigation such that the Residential Visual Amenity Threshold has not been met, i.e. no residential receptors were found to have major adverse effects at year 15, and therefore a specific Residential Visual Amenity Assessment is not required. It should be noted that the Applicant has sought to further minimise the visual impact of the Proposed Development upon residential receptors in close proximity to the Proposed Development. As reported in Chapter 10: Landscape and Visual Impact Assessment of the ES **[AS-117],** the removal of solar PV in Field 46 adjoining Grange Cottage, and the amendment of proposed landscaping (as set out in the Landscape Mitigation Plan, which forms Appendix A of the Framework LEMP **[REP1-039]**) results in the assessment of visual effects at this property having reduced from moderate adverse (significant) effects in Years 1 and 15 (Winter) of operation, and minor adverse (not significant) in Summer Year 15, to minor adverse (not significant) at Year 1 Winter, and negligible adverse at Year 15 Winter and Summer. As detailed in Paragraph 6.3.122 of the Planning Statement **[AS-098]** paragraph 5.10.5 of EN-1 acknowledges, '*Virtually all nationally significant energy infrastructure projects will have adverse effects on*

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			the landscape.' When making a decision on the DCO Application, the Secretary of State will need to balance these impacts against the urgent need and critical national priority for the Proposed Development as set out in the energy NPSs and the benefits of the Proposed Development. The need for the Proposed Development is further detailed in the Statement of Need **[APP-184]**
REP1-057	Conclusions on landscape character and visual impacts	As set out in paragraphs 13.37 – 13.40 of the LIR, the Council considers that there would be significant adverse effects on landscape character and the visual amenity at all main phases of the scheme (construction, operation year 1, operation year 15). Some of these effects are considered to be both understated in the LVIA; and very long term, meaning that perhaps they should be considered as permanent. The cumulative impacts of the proposals with other large scale solar energy schemes either submitted, or pending such, are also understated. The Council recommends that the risks associated with possible over-reliance on mitigation planting success should be overcome by amending the submitted Framework Landscape and Ecological Management Plan (FLEMP, AS-101) to ensure that the detailed LEMPs cover an extended period. Unless and until the points raised by AAH have been addressed - including changes to the LEMP and mitigation proposals if necessary – the Council considers that the development has not done enough to satisfy the requirements of CLLP policy S14, S53 and S66 (along with the applicable parts of the three Neighbourhood Plans referred to in section 9 of the Council's LIR) to ensure that it represents high quality sustainable design which contributes positively to local character and landscape.	It should be noted that the non-permanent and reversible nature of a solar NSIP with 60 year consent has been acknowledged in the Secretary of State's decisions on a number of solar NSIPs, such as Tillbridge Solar Farm, Mallard Pass Solar Project, West Burton and Gate Burton Energy Parks, which have all been granted consent. For example, the Secretary of State confirmed that the 60- year consent lifespan is considered 'temporary and reversible for the majority of the land' (paragraph 4.167 of the Gate Burton decision). NPS EN-3 also supports this position at paragraph 2.10.66 which states that: "*time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed*." The Applicant acknowledges that the residual effects would be long term but disagrees that the Proposed Development should be classed as a permanent project. Under Requirement 20 at Schedule 2 of the Draft DCO **[REP1-007]** decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational period the land would be available for its current use. Any material change of use would require planning permission. As such, following decommissioning and removal of all above ground infrastructure from within the Principal Site the associated adverse landscape and visual effects would cease. The Framework LEMP has been updated and will be submitted to the Examination at the next available deadline to include clarifications on the length of time covered by the management plan, as well as the provisions for replacement planting. It is therefore the Applicant's view that the applicable Local and National Policies are satisfied.
REP1-057	Above Ground Heritage Assets	There has been a poor level of pre-application engagement with the Council by the applicant team on above-ground heritage assets. This may have been a factor in the second issue, which is that the Council's request (for instance at the Preliminary Environmental Impact Review stage) for the study area for non-designated and designated heritage assets to be extended to 5km has been ignored. It is therefore not possible to be sure that there are no above-ground heritage assets which would not be adversely affected by the proposals. In this regard, it is noted that Historic England (HE) does not normally comment on effects on Grade II Listed Buildings, which is left to local Councils to address. This was confirmed orally by HE at the recent ISH. Therefore sole reliance on Historic England's views on the extent of the study area risks omitting consideration of impacts on relevant assets, which, at their own confirmation, fall out of the scope of HE's advice.	The Applicant acknowledges there is a difference of opinion regarding suitable scope of assessment between the consultees. In such circumstances, a decision has to be made regarding scope that is most appropriate, considering the potential cultural heritage receptors and the Proposed Development, based on the advice provided and professional opinion. The Applicant disagrees that NKDC's request for the study area for non-designated and designated heritage assets to be extended to 5km has been ignored - the study areas considered in Chapter 7: Cultural Heritage of the ES **[APP-032]** align with other solar farm schemes in Lincolnshire. Applying a greater study area for both designated and non-designated assets would scope in thousands of heritage assets and is not considered proportionate. A 5km study area has been applied for designated assets of highest significance around the Principal Site. Historic England's Scoping Report Consultation Response confirmed the suitability of the approach to the Study Area. The Statement of Common Ground with LCC lists the engagement with the council during the preparation of the ES and will provide a summary of points of agreement and disagreement at Deadline 3. As it has been clarified in Chapter 7: Cultural Heritage of the ES **[APP-032]**, the approach, specifically in relation to study areas utilised, was agreed through consultation with Historic England, who approved of the flexible, expertise based approach to setting matters at the Scoping stage. This approach was further

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			discussed and agreed in a meeting on 31 March 2025 between Historic England and Cotswold Archaeology (on behalf of the Applicant). As such, following Historic England's advice, the flexible approach, based on expertise and not constrained by fixed radii, was utilised in the submission documents, and it is considered that this approach provides proportionate and sufficient understanding of the cultural heritage resource and the potential impacts from the Proposed Development. With regard to comments on Grade II Listed Buildings, the Applicant would like to highlight that with regard to the Proposed Development, HE have been providing comment and advice on potential effects in relation to Grade II Listed Buildings (i.e. relating to the Old Church in Aubourn or Grange Cottage). The Applicant is of the opinion that the study areas for designated heritage assets as utilised for the heritage asset setting assessment (3km for all such assets, 5km for those that are of the highest significance, and exceptional examples beyond) are appropriate. However, a Technical Note will be provided, accompanied by an appropriate illustration, which will present a summary of all designated heritage assets within 5km area from the Principal Site that have been scoped out (including Grade II Listed Buildings), and adding consideration of those additional exceptional assets beyond (also scoped out). The Applicant's intention to submit this additional note, was communicated to the LCC Historic Buildings & Landscape Officer and NKDC Conservation Officer via email on 28 January 2025. The note will be submitted to the Examination at a future deadline), and which will provide further justification on this matter.
REP1-057	Above Ground Heritage Assets	There are deficiencies in the scope and detail of the assessments carried out, In relation to the following: a. the settings assessments for designated heritage assets Morton Manor and Morton Grange (both Grade II Listed), and River Farmhouse, Norton Disney (Grade II Listed) and Grange Cottage, Aubourn (Grade II Listed) – see paragraph 16.13 of the Council's LIR b. inaccuracies and omissions relating to designated and non-designated heritage assets Coleby Hall Registered Park and Graden, Coleby Conservation Area, Househam Wood Farm and Housham Grange – see paragraph 16.13 of the Council's LIR.	<u>Designated Heritage Assets</u> The Applicant is of the opinion that the consideration of potential impacts in relation to heritage assets is sufficiently detailed. With regard to the assets for which additional comments have been raised, the following responses are provided: • **Morton Manor and Morton Grange.** The Applicant considers that the detailed settings assessment, carried out in line with Historic England guidance (Appendix 7-D: Detailed Heritage Asset Setting Assessment of the ES **[APP-127]**), provides an appropriate and proportionate level of assessment. It considered, and detailed, elements of the assets' setting which contribute to their significance, which includes elements such as views of the buildings from Morton Lane and the wider rural landscape. The A46 is not relevant to the setting of the asset due its distance from it and the status of the A46 as a modern infrastructure development. This was not noted in the assessment, but it is neither feasible, nor proportionate, to mention all aspects of the landscape / setting that are not relevant to the assessment. Views along Morton Lane were discussed, highlighting those which contribute to the heritage significance of those assets, including the visibility of the Principal Site in those views. This assessment subsequently informed the assessment of impacts of the Proposed Development upon those assets, also presented within Appendix 7-D **[APP-127]**, and it was concluded that with the proposed mitigation measures, the appreciation and understanding of the special interest of the Listed Buildings would not be affected (resulting in no harm). • **River Farmhouse.** The assessment of level of harm upon the Listed Building, taking into consideration the asset's heritage significance and its setting, the Proposed Development and mitigation measures, was presented within the detailed settings assessment within Appendix 7-D: Detailed Heritage Asset Setting Assessment of the ES **[APP-127]**, in line with Historic England guidance. This focused on aspects of the asset's setting which contribute to its significance (Historic England guidance clarifies that not all elements of setting contribute), and the Applicant is of the opinion that the assessment has accurately described the aspects of the setting of River Farmhouse which do contribute. These include, in summary, the gardens, associated farm range (and associated views), wider setting of agricultural land, and longer distance views in which the asset can be experienced (several views from the east have been highlighted, including from parts of Clay Pit Lane or footpaths). It should also be highlighted that those views which contribute have been taken into account, with no development between River Farm and Clay Pit Lane. However, any movement along Clay Pit Lane cannot be considered as

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contributing to the asset's significance, given the visibility of the Listed Building from the lane is obscured from many locations (and as such the farmhouse cannot be experienced in those views), and also as no such views (if they were possible more widely) form part of the conscious design (in contrast to, for instance, a drive approach through a parkland). In response to the assessment of impact, the Applicant would like to stress, as per Historic England guidance, that setting is not itself a heritage asset and as such the assessment of impact must be directed to any change to the significance of the heritage asset (not just the change to the setting). Here, the Proposed Development will change part of the asset's wider setting, but the historic and architectural interest of the Listed Building itself, and the contribution to the heritage significance from the asset's immediate setting, will not be affected at all. As such, although there will be a change within the wider setting, its overall effect on the significance of the asset will be minor (as only part of the asset's setting and experience will be affected), and the conclusion within the assessment therefore found the overall harm to be within the lower end of less than substantial harm.

- **Grange Cottage.** The Applicant acknowledges the comment but is of the view that Appendix 7-D: Detailed Heritage Asset Setting Assessment of the ES **[APP-127]** provides an appropriate assessment of the harm to the heritage significance of the asset from the Proposed Development. In line with Historic England guidance, this considered how change within the setting of an asset affects the asset's significance (as the setting in itself is not an asset), and a slight change to the experience and perception of the asset within its rural setting resulting from the Proposed Development was deemed to fall within the lower end of less than substantial harm. Additional consultations with Historic England were held on 15 September 2025 during an in person meeting on site to discuss the layout of the Proposed Development in proximity to Grange Cottage. In response to Historic England's concerns regarding the proximity of solar PV to Grange Cottage and heritage assets at Aubourn, the Proposed Development has been altered to remove panels from Field 46. The outcome of these consultations is summarised within a Statement of Common Ground between the Applicant and Historic England (which is currently under preparation and will be submitted at the midpoint of Examination, in line with the Examining Authority's request in its Procedural Decision of 22 August 2025 **[PD-005]**) and the changes reflected within updated plans and photomontages, which were submitted to the Examination as part of the Change Request 1 **[AS-103].** In summary, whilst the Applicant is of the opinion that the assessment of lower end of less than substantial harm is accurate, the proposed removal of the panels within Field 46 (as noted above) should ameliorate or resolve NKDC's concerns by reducing any change within the agricultural landscape surrounding the cottage
- **River Farmhouse.** The assessment of level of harm upon the Listed Building, taking into consideration the asset's heritage significance and its setting, the Proposed Development and mitigation measures, was presented within the detailed settings assessment within Appendix 7-D: Detailed Heritage Asset Setting Assessment of the ES **[APP-127]**, in line with Historic England guidance. This focused on aspects of the asset's setting which contribute to its significance (Historic England guidance clarifies that not all elements of setting contribute), and the Applicant is of the opinion that the assessment has accurately described the aspects of the setting of River Farmhouse which do contribute. These include, in summary, the gardens, associated farm range (and associated views), wider setting of agricultural land, and longer distance views in which the asset can be experienced (several views from the east have been highlighted, including from parts of Clay Pit Lane or footpaths). It should also be highlighted that those views which contribute have been taken into account, with no development between River Farm and Clay Pit Lane. However, any movement along Clay Pit Lane cannot be considered as contributing to the asset's significance, given the visibility of the Listed Building from the lane is obscured from many locations (and as such the farmhouse cannot be experienced in those views), and also as no such views (if they were possible more widely) form part of the conscious design (in contrast to, for instance, a drive approach through a parkland). In response to the assessment of impact, the Applicant would like to stress, as per Historic England guidance, that setting is not itself a heritage asset and as such the assessment of impact must be directed to any change to the significance of the heritage asset (not just the change to the setting). Here, the Proposed Development will change part of

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			the asset's wider setting, but the historic and architectural interest of the Listed Building itself, and the contribution to the heritage significance from the asset's immediate setting, will not be affected at all. As such, although there will be a change within the wider setting, its overall effect on the significance of the asset will be minor (as only part of the asset's setting and experience will be affected), and the conclusion within the assessment therefore found the overall harm to be within the lower end of less than substantial harm. **Non-Designated Heritage Assets** The responses to concerns regarding these highlighted heritage assets are as follows: • (**NKDC 2017c), which includes Coleby Hall Park and Garden (NHLE 1000973) as well as a number of Grade II Listed Buildings and the Grade I Listed Church of All Saints (NHLE 1164829)**, extends to within approximately 300m to the north of the Cable Corridor. • **Coleby Conservation Area** which extends to within approximately 300m to the north of the Cable Corridor, and includes **Coleby Hall Registered Park and Garden (RPG)** and a number of Listed Buildings**.** Paragraph 3.41 of Appendix 7-D: Detailed Heritage Asset Setting Assessment of the ES **[APP-127]** which acknowledges not only the location of the RPG in relation to the Cable Corridor, but which also considers the distance from the closest Solar PV Array area (which would be 4km). In addition, Annex 2: Gazetteer of Heritage Assets of Appendix 7-D lists Coleby Hall RPG as part of the designated heritage assets within 3km study area (line 7 of the table on page 141). The same applies to the Conservation Area, which has been scoped out from detailed assessment. However, for transparency and to ensure all designated heritage assets are referenced appropriately within the documents submitted, a Technical Note is under preparation, accompanied by an appropriate illustration, which details all designated heritage assets within the 5km study area from the Principal Site (and others which may have been accidentally omitted) that have been scoped out. • **Housham Wood Farm.** The farm is not a locally listed building, or a building recorded in the HER. The HER records Housham Wood Farm as a monument (farmstead, of post-medieval to modern date, HER ref. MLI86044). But whilst the HER record mentions the farmhouse as a surviving historic structure, research carried out as part of the assessment indicates this is not the case. Planning permission was granted by NKDC for the erection of a replacement dwelling (11/0629/FUL), with Conservation Officer comments at that stage not raising objections from the conservation perspective. The subsequent application to discharge conditions (12/0052/DISCON) clearly illustrates the proposed and existing (to be demolished) buildings, with the aerial imagery from 2013 onwards showing the replacement dwelling within this farm. As such, the historic building on this farm had been demolished and replaced, and the replacement structure (which dates to the 21st century) does not comprise a heritage asset or require any further consideration in heritage terms. Similarly, Housham Grange (HER ref. MLI126096) is recorded by the HER as a monument (a post-medieval to modern farmstead), characterised by significant loss of historic buildings and the presence of large modern sheds. The farm is not a locally listed building or historic building recorded by the HER. As such, there is no justification for this farmstead to be considered a non-designated heritage asset requiring consideration.
REP1-057	Archaeology	Broadly, the Council supports the concerns of LCC's archaeological advisers set out in Appendix C to the LIR. Concerns are raised regarding the potential for various works and activities to damage archaeological resources, which have not been addressed to date in the submitted assessments – especially for areas of the site with unknown potential. This means that it cannot be said with confidence that the currently proposed development design and the archaeological mitigation strategy are adequate. Further trail trenching is necessary in advance of any grant of consent.	As part of the DCO submission, there is the commitment to ensure that archaeological remains to be preserved in-situ as part of the mitigation are protected from impacts, as included within the Framework CEMP **[REP1-031]**, ref. measure CH-C1. The Applicant is of the opinion that appropriate measures will be defined within the detailed CEMP, reflecting the understanding of the archaeological resource (informed by the ongoing and further trial trenching), specific construction methods and detailed design. There needs to be an understanding that where non-intrusive methods are proposed, some machinery movement will be required to facilitate construction, but this can be done using appropriate equipment in the right conditions (and not heavy machinery on saturated ground). The details will depend on the detailed design and the mitigation measures proposed, and those can be agreed in the detailed CEMP. The Applicant would also like to highlight the opportunities the Proposed Development brings to define appropriate measures to

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			protect such remains (with no protection currently in place from regular ploughing and movement of farm machinery which result in impacts such as wheel ruts or plough scars). The Framework CEMP **[REP1-031]** is to be developed into a detailed CEMP, substantially in accordance with the Framework Plan, secured under Requirement 12 of the Draft DCO **[REP1-007].** To further expand on the point of identification of archaeological remains, following the granting of the DCO, additional trenching will be carried out where required, as secured within the Framework WSI **[AS-001]**. The Framework WSI is currently being finalised following completion of the Final Trial Trenching Report and consultation with the relevant stakeholders (LCC (on behalf of LCC and NKDC) and HE), and will be submitted to the Examination at a future Examination deadline. The Applicant would like to acknowledge the support and involvement from the consultees (both at LCC and HE) in the preparation of the Framework WSI, with their comments appreciated. For the avoidance of doubt, the surveys and assessments completed to inform Chapter 7: Cultural Heritage of the ES **[APP-032]** have contributed to the understanding of the archaeological resource across the DCO Site which, together with the Final Trial Trenching Report, provide sufficient information to inform the decision making process with regard to archaeology.
REP1-057	Archaeology	In short, the baseline of information is not sufficient to properly show how the assessments have supported the design of either the development or an appropriate archaeological mitigation strategy, as advised at section 3.1 of the EIA Scoping Opinion (APP-119). It is much preferred that sufficient trial trenching is undertaken across the full Order Limits to provide the essential baseline evidence to design a reasonable and fit-for-purpose mitigation strategy. Post-consent trenching leaves a high degree of risk, with the potential for archaeological works to impact the construction programme and budget.	Chapter 7: Cultural Heritage of the ES **[APP-032]**, specifically Section 7.6 Embedded Mitigation Measures, details key measures that have been incorporated into the design of the Proposed Development, based on the archaeological surveys completed, including early definition of areas of particular archaeological value to ensure those areas are excluded from the Proposed Development. As such the design of Proposed Development has been informed by the archaeological work. However, at the request of the Examining Authority, a summary of embedded measures (informed by the assessment work completed to inform the ES) was provided in Appendix B of the Applicant's Written Summaries of Oral Submissions for Issue Specific Hearing 1 **[REP1-046].** With regard to potential risks associated with the post-consent trenching, there are numerous examples that demonstrate the potential archaeological resource can be managed through trenching carried out post-consent, which then leads to either mitigation measures by design (i.e. micro-siting/avoidance) or specific and appropriate mitigation via preservation by record (archaeological investigations). At the request of the Examining Authority, examples of where such measures have been successfully implemented on other schemes was provided in Appendix B of the Applicant's Written Summaries of Oral Submissions for Issue Specific Hearing 1 **[REP1-046]**. As appropriate evaluation will be carried out following the granting of the DCO (pursuant to Requirement 11 of the Draft DCO), to adequately identify surviving archaeological remains across the DCO Site which may be affected by the construction works, appropriate mitigation measures to ensure the remains are either protected or appropriately recorded will be defined at the post-consent stage including via detailed design and through the detailed CEMP.
REP1-057	Archaeology	At present, the ES concludes that no significant residual effects on the archaeological resource are predicted during the construction of the development. The Historic Environment (Infrastructure) Officer's view is that, based on the information gathered to date, this is incorrect. Potential buried archaeological remains have yet to be located, identified and characterised, as there is not yet sufficient baseline evidence for an informed understanding of the significance of surviving archaeology within the Order Limits.	The Applicant appreciates archaeological remains are located within the DCO Site, for which appropriate mitigation measures are, or will be, agreed in the CEMP. It should be noted that, as per Requirement 12 of the Draft DCO **[REP1-007]**, the CEMP must be substantially in accordance with the Framework CEMP **[REP1-031]** and construction of the authorised development must be carried out in accordance with the approved CEMP. The Framework CEMP **[REP1-031]** (ref. CH-C1) notes: "*Where impacts to below ground archaeological remains as a result of the Proposed Development cannot be avoided, an appropriate programme of archaeological investigation and recording will be undertaken, with the objective of advancing the understanding of the significance of archaeological remains within the DCO Site that may be disturbed or either wholly or partially lost. The fieldwork will be undertaken prior to the commencement of construction works but may also include monitoring and recording works during construction. The detailed CEMP(s) will reflect mitigation required during construction which will be set out in the WSI and include measures such as ensuring monitoring is in place where required*."

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			DCO requirements are legally binding and enforceable by the LPA, as such the various management plans secured under the DCO requirements must be complied with; failure to comply with the provisions of the various management plans (and other measures) secured under the DCO requirements would be a breach of the terms of a DCO, which is a criminal offence. The results of the Final Trial Trenching Report, and any additional required trenching under Requirement 11 of the Draft DCO **[REP1-007]**, will inform the detailed design under Requirement 6, which will be carried out following granting of the DCO, as detailed within the Framework WSI **[AS-001].** As part of an iterative approach to the detailed design process, the locations for construction activities will be fed into the design for a programme of further trial trenching work, which will in turn inform the design process and appropriate mitigation measures. This staged approach to further investigation of those additional areas is presented within the Framework WSI **[AS-001].** The Framework WSI is currently being finalised following completion of the Final Trial Trenching Report and consultation with relevant stakeholders (LCC and HE) and will be submitted to the Examination at a future Examination deadline. The Applicant is liaising with and would like to acknowledge the support and involvement from the consultees (both at LCC (on behalf of LCC and NKDC) and HE) in the preparation of the Framework WSI, with their comments appreciated. Further liaison with LCC as the relevant Local Planning Authority (LPA) to develop the next stage of site-specific WSIs to guide the detailed design process and post-consent activities, and prior to the carrying out of any archaeological works, will be carried out pursuant to Requirement 11 of the Draft DCO **[REP1-007]**. As such, it is considered that there are appropriate measures in place to ensure there will be no significant effects.
REP1-057	Conclusions on Cultural Heritage	The Council considers that the baseline information in relation to cultural heritage is insufficient to inform the design of the development, including appropriate and sufficient mitigation proposals. Some effects on assets have either not been addressed, or are underplayed in the ES. Therefore, it is not possible to conclude that there are no significant residual adverse effects on cultural heritage. Until these points have been addressed, it is not possible to say that the proposals satisfy CLLP policy S14, S53, and key policy S57 'The Historic Environment' in respect of the need to protect, conserve and take opportunities to enhance the historic environment, including the protection of assets and their settings - including both designated and non-designated assets.	The Applicant considers that the assessments completed to inform Chapter 7: Cultural Heritage of the ES **[APP-032]**, including Appendices 7-B Cultural Heritage Desk Based Assessment **[APP-125]**, 7-C Known Heritage Assets **[APP-126]**, 7-D Detailed Heritage Asset Setting Assessment **[APP-127]** and 7-E Historic Landscape Character Assessment **[APP-128]** have contributed to the understanding of the potential sensitive cultural heritage receptors which could be affected as a result of change within their setting, and provide sufficient baseline information to inform the design of the Proposed Development and embedded mitigation, the understanding of effects upon those assets and the decision making process. The Applicant is of the opinion that the consideration of potential impacts in relation to heritage assets is sufficiently detailed, with mitigation measures already incorporated where possible into the design of the Proposed Development. To clarify mitigation measures already incorporated, a summary of embedded measures (informed by the assessment work completed to inform the ES) was provided in Appendix B of the Applicant's Written Summaries of Oral Submissions for Issue Specific Hearing 1 **[REP1-046]**. Additionally, to address concerns regarding the designated heritage assets, a Technical Note will be provided, accompanied by an appropriate illustration. This will present a summary of all designated heritage assets within a 5km study area from the Principal Site that have been scoped out (including distances from the DCO Site Boundary for all assets) and a number of exceptional assets beyond the study area (also scoped out from detailed assessment). The Applicant's intention to submit this additional note, was communicated to the LCC Historic Buildings & Landscape Officer and NKDC Conservation Officer via email on 28 January 2026. The Applicant refers NKDC to the responses provided above with regards to the conclusions provided here. The Applicant has appraised the Proposed Development against policy relevant to the historic environment in Section 6 of the Planning Statement **[AS-098]**, concluding that the Proposed Development is in accordance with national and local policy with regard to the historic environment. National and local planning policy relevant to the historic environment is also considered in Appendix B National Policy Accordance Tables and Appendix C Local Policy Accordance Tables of the Planning Statement **[AS-098]**.

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			The Applicant has appraised the compliance of the Proposed Development against Policies S14 Renewable Energy, S53 Design and Amenity and S57 The Historic Environment in Appendix C Local Policy Accordance Tables of the Planning Statement **[AS-098]**.
REP1-057	BNG	The Council's position is that the ecological information and assessments accompanying the application provide a reasonable summary of ecological interest features and likely significant effects, mitigation, and residual effects of the proposed development. If the full suite of avoidance and mitigation measures are carried out effectively, the proposals would have a negative impact on ecology during the construction phase. However, if all of the proposed enhancements are delivered promptly and effectively, these adverse impacts may prove to be short term, and the development has the potential to lead to positive effects for ecology and nature conservation over the 60 year operational lifespan of the development.	As set out in Chapter 8 Ecology and Nature Conservation of the ES **[REP1-019]**, with the application of the identified mitigation measures, no significant adverse effects during construction of the Proposed Development are concluded. Further to this, Chapter 8 Ecology and Nature Conservation of the ES **[REP1-019]** also concludes that with the wide ranging enhancements provided for in the Framework LEMP **[REP1-039]**, beneficial effects will occur for a range of habitats and species. The Applicant has committed to delivering a minimum of 30% biodiversity net gain in habitat units, 50% biodiversity net gain in hedgerow units and 10% biodiversity net gain in watercourse units based on Statutory Biodiversity Metric Version 1.0.4. This commitment is secured through Requirement 8(2) of the Draft DCO **[REP1-007]**.
REP1-057	BNG	Much depends in that respect on the successful preparation and implementation of a comprehensive scheme of biodiversity mitigation and enhancements; which in turn requires a rigorously prepared baseline assessment and evaluation. As set out at paragraphs 15.22 – 15.24 of the LIR, and reported by the District Council's Principal Ecology and Wildlife Officer, there are a number of potentially significant omissions from the applicant's BNG submissions. This means that the baseline metric and proposals cannot be accepted as accurate and sufficient at this stage. Until those concerns have been resolved satisfactorily (in accordance with Central Lincolnshire's BNG guidance and national guidance), it is not possible to say that the scheme satisfies the requirements of the following policies of the CLLP: • S59: Green and Blue Infrastructure Network • S60: Protecting Biodiversity and Geodiversity • S61: Biodiversity Opportunity and Delivering Measurable Net Gains	The Applicant discussed the issues raised with NKDC's and LCC's ecologists at a meeting on 22 January 2026 and will be updating the report and Metric where applicable following a further discussion with LCC and NKDC. The majority of the issues were resolved during the meeting; however some points will require further discussion prior to updating the BNG Report, including: • Justification for the use of assumptions and significance multipliers; • Confirmation that pre-application degradation has been considered; • Failure to properly consider small areas of habitat within the Cable Corridor; • Absence of information relating to the identification of ancient and veteran trees; • Incorrect figures for habitat loss and replacement in the Metric; • A lack of clarity regarding the identification of the habitat type and condition for areas under the solar panels in relation to the single axis tracker option; • Failure to meet the BNG 'trading rules' for arable field margins lost to the development; and • A lack of clarity on how hedgerows which are already in good condition will be enhanced by increasing distinctiveness. The Applicant is continuing to engage with NKDC regarding the specific comments on the BNG assessment. Once resolved an updated Biodiversity Net Gain report will be submitted into the Examination. Resolution of these matters will be recorded in the Statements of Common Ground with NKDC and LCC to be submitted to the Examination.
REP1-057	BNG	As part of Issue Specific Hearing 1, it was proposed that discussions between the ecological advisers to the applicant, the County Council and the District Council on this topic should be held as soon as possible following publication of Local Impact Reports and Written Representations at Deadline 1. The District Council welcomes this approach.	As noted above, the Applicant has met with NKDC's ecologist and discussed all potential issues raised. These issues will be addressed in an updated BNG Report and Metric (and submitted to the Examination at a future examination deadline) where appropriate following a subsequent meeting with NKDC/LCC to agree the changes to be made, and will be reflected in the Statement of Common Ground with NKDC to be submitted to the Examination. The Applicant would highlight that whilst it acknowledges the points made by NKDC, the substantial enhancements provided by the Proposed Development as set out in the Framework LEMP, provide extensive tangible benefits for biodiversity.
REP1-057	Rights of Way / Recreation	Although the Council defers to Lincolnshire County Council on most matters related to the statutory rights of way network, the LIR raises concerns particularly in relation to the Stepping Out Walks which the Council promotes. Potential effects are discussed in paragraphs 17.8 – 17.23 of the LIR, and include not just public access *per se*, but also the potential for	This comment setting out the overall policy framework in detail is noted and responded to where applicable in the following rows of this table.

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		impacts on the character and value of the experience of users – not least as a result of visual effects - with consequences for recreation, public health, and the tourism economy (see also LIR sections 19 'Transport and Access', 23 'Socio Economics' and 26 'Cumulative Effects'). However, following on from the discussions at the Preliminary Meeting and at Issue Specific Hearing 1 under item 3.5 of the agenda, it was recognised that the Council's concerns covered a range of issues; and the Council was asked to provide the full policy basis for consideration of potential effects on the 'Stepping Out Walks'; along with a plan showing how these relate to the rights of way and permissive paths proposed as part of the Fosse Green Energy project. Therefore this section of the Council's WR explains the overall policy framework in greater scope and detail, before identifying the Stepping Out Walks and noting the potential impacts and effects of the proposals on those walks.	
REP1-057	Rights of Way / Recreation	Paragraph 5.11.24 of EN-1 states that the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is maintained; with necessary works to mitigate any adverse impacts and *'… where appropriate, to improve that network and other areas of open space including appropriate access to National Trails and other public rights of way and new coastal access routes.'* It may be necessary to ensure that adverse effects are mitigated or compensated for by using planning obligations. Paragraph 5.11.30 notes the importance of rights of way and other access rights to land – and advises that the Secretary of State *'… should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access*.'	The Applicant notes the policy context provided in this section of the WR. The Applicant has identified and described the legislation, policy and supporting guidance considered most relevant to the Traffic and Transport Assessment at Appendix 13-A: Traffic and Transport Legislation and Policy of the ES **[APP-163]** and in Appendix 16-1 Socio-Economics, Tourism and Recreation, Legislation, Policy, Guidance and Supporting Information **[APP-240].** The Planning Statement **[AS-098]** also provides Policy Accordance Tables to demonstrate how the Applicant has complied with the policies referred to. However, the Applicant is still not clear on the policy status of the Stepping Out Walks referred to by the Council, in the context of the wider consideration of the impacts of the Proposed Development on designated Public Rights of Way in terms of landscape and visual effects, socio-economic effects and others considered as part of the Environmental Impact Assessment prepared for the Application, and the provision of new Permissive Paths. Indeed, even within the lengthy policy analysis provided by the Council in its Written Representation, the only reference to stepping out walks that the Applicant can identify is in Priority Outcome 1 of the North Kesteven Active Travel Strategy 2025 – 2030, to "*Investigate the potential for further development of 'stepping out' style routes and information for walking and wheeling."* The Active Travel Strategy's goal is to increase participation in active travel by enhancing infrastructure, promoting safety, and raising awareness of health and environmental benefits, supporting overall council wellbeing and climate priorities. It does not provide any particular policy status or protection for 'Stepping Out Walks' and the Applicant maintains that in considering the potential for impacts of the Proposed Development on formally designated Public Rights of Way and Permissive Paths, as well as providing new Permissive Paths with the design of the Proposed Development, it has addressed those goals identified in the Active Travel Strategy.
REP1-057	Rights of Way / Recreation	Paragraph 2.10.43 of EN-3 encourages applicants to minimise the visual impacts of development on users of existing public rights of way. In connection with this, footnote 89 highlights that screening introduced to minimise views of solar developments may impact on the ability of users to appreciate the surrounding landscape. EN-3 paragraph 2.10.44 states that: '*Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account, where appropriate, the views of landowners*.'	
REP1-057	Rights of Way / Recreation	Comment includes an insert from CLLP Policy S48 (see page 14 of the WR).	This policy has been considered in the initial development of the Proposed Development (as relevant), especially through the introduction of 9.5km of permissive paths, and any detailed design will be cognisant of this.

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		CLLP supporting paragraph 8.3.1 emphasises the potential benefits of walking, including to the health and physical fitness of the population. CLLP paragraph 8.3.7 states that developments must integrate sustainable forms of transport into their designs, including consideration of the quality of walking environments to ensure routes are safe, legible and attractive; with good connections into the existing public rights of way network.	
REP1-057	Rights of Way / Recreation	Thorpe on the Hill Neighbourhood Plan 2016 – 2036 (made 2018) This plan includes Policy 4: Green Spaces and Green Infrastructure, which states that: 2. Development should protect public rights of way and the enhancement of public rights of way will be supported. 3. Where necessary to mitigate the impact of a development proposal, proportionate contributions will be sought to improve existing or deliver new green spaces or other green infrastructure. The delivery of new, or improvements to, green spaces or green infrastructure will be supported. The supporting text at paragraphs 6.4 – 6.6 emphasises the value placed on the network of access routes in the area, including benefits they bring to physical and mental health, connectivity, leisure, sense of place, visitor attractions and landscape character. Policy 5: Landscape and Views goes on to state that: *Development outside the village curtilage should not reduce the separate identity of Thorpe on the Hill by reducing the existing gap between the village curtilage and the A46; and must respect the unique layout and pattern of the enclosure landscape of Thorpe on the Hill, as well as field boundaries such as hedges and trees. Development must also take account of the important views identified on Map 5. The preservation and enhancement of these views will be supported.* Supporting paragraph 6.13 notes that Map 5 shows distinctive views that need to be considered in development proposals, and which are described in further detail in Appendix 2 of the plan. Extracts from the Neighbourhood Plan are set out at Appendix G2 to the Council's LIR.	Appendix C of the Planning Statement **[AS-098]** sets out the local policy accordance tables, which includes the Thorpe on the Hill Neighbourhood Plan. As set out in Appendix C of the Planning Statement **[AS-098]**, Thorpe-on the Hill Neighbourhood Plan Policy 4, the Principal Site has been designed to fit within the network of PRoW and existing permissive paths to further enhance local connectivity through the provision of permissive paths and circular routes to be available for public use during the operation of the authorised development to improve accessibility. The Proposed Development will also create a number of new permissive paths across the Principal Site. The provision and management of permissive paths is detailed within the Framework PRoW-MP **[APP-195]** and will be secured by Requirement 18 in Schedule 2 of the Draft Development Consent Order **[REP1-007]**. The impact of the Proposed Development upon green infrastructure has been a key consideration in the design evolution of the Proposed Development. This is demonstrated by Design Principle 9 which focusses on biodiversity and is set out in Section 3.8 of the Design Approach Document **[APP-186]**. The design principle requires the Proposed Development to 'seek to avoid adverse impacts and to enhance existing biodiversity through the creation of new green infrastructure and the creation of new habitat for wildlife to achieve a minimum 10% in Biodiversity Net Gain'. As set out for Policy 5, Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** states in paragraph 10.6.9 the solar PV panels and associated infrastructure have been sited to preserve, as far as possible, cross valley views from Thorpe on the Hill. The Principal Site is mostly set back from settlement boundaries, such as fields immediately adjacent to Thorpe on the Hill. Where this has not been possible, offsets (typically measuring in excess of 100m) and new planting have been incorporated to retain a sense of openness whilst screening the solar PV panels. As set out in Section 10.7 of Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** during year 15 of operation of the Proposed Development, there would be a higher scenic quality from the vegetation being in leaf and increased opportunities for biodiversity for the Thorpe on the Hill Local Landscape Character Area. Effects experienced during construction would be short term and temporary.
REP1-057	Rights of Way / Recreation	Bassingham Neighbourhood Plan 2016 – 2036 (made 2017) This plan includes policy ES5, which states that: *Any proposal requiring a planning application for energy generating schemes and infrastructure using renewable energy sources, and new Renewal Energy Scheme development will be supported in the Neighbourhood Plan Area provided that: …* • The siting, scale and design of any energy generating infrastructure does not compromise public safety, allows continued safe use of public rights of way, and does not adversely affect existing amenities.	This comment setting out the overall policy framework in detail is noted.

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		• Any technologies and infrastructure used to generate energy should not detract from the rural, visual and historic character of the village and the surrounding landscape setting and environment. Policy T1 states that: *Where it is appropriate and proportionate, planning applications should be accompanied by information which demonstrates how the following considerations have been addressed:* • Provision of safe walking and cycling routes in the immediate area of the site with consideration given to the need to maintain and enhance walkable access to services and facilities in the village, and to the surrounding open countryside; • Opportunities to extend existing routes for walkers and cyclists, including routes linking into the surrounding countryside, as well as into the village, and to accommodate people of all ages and abilities, including those with pushchairs and wheelchairs; … In addition to the above planning policy statements and local development plan documents, there are other Council strategies and initiatives which are relevant to this issue, as summarised below.	
REP1-057	Rights of Way / Recreation	Local Transport Plan 5 (LTP5) LPT5 is adopted by Lincolnshire County Council, and includes a number of policies arranged under identified themes and objectives. Relevant extracts of LTP5 are included as Appendix B to this WR. Under Theme 3 'Promoting thriving environments', the commentary to Objective 3c starting on page 77 of LTP5 includes Policy ENV5 which states that: '*We will support, promote and provide sustainable access to our sensitive built and natural environments*.' This is noted to be important not least because, with reference to the visitor economy of Lincolnshire, '*Improving sustainable access to our environmental and heritage assets would help to support this sector of our economy.'*	This comment setting out the overall policy framework in detail is noted.
REP1-057	Rights of Way / Recreation	The comment sets out exerts from Themes 1, 2, 4 of the Lincolnshire Walking Strategy (LWS). In the tables on pages 18 – 21 of the LWS, the following policy of the LWS runs through themes 1, 2 and 4: '*Develop an updated Rights of Way Improvement Plan (ROWIP) that includes plans to enhance the existing PRoW network and develop new connections.'* In addition in relation to Theme 4, the following policies are considered relevant: • 'Work with partners to promote walking routes and destinations, such as the Wolds, the Viking Way and the Coast, as part of Lincolnshire's tourism offer…	This comment setting out the overall policy framework in detail is noted.

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		• Build on the increase in local leisure walking during the lockdown periods by promoting local routes and green spaces.'	
REP1-057	Rights of Way / Recreation	North Kesteven Active Travel Strategy 2025 – 2030 (see Appendix E to this WR for extracts) Page 5 of this strategy sets out the aims and priorities. The overarching Aim is to 'Increase participation in walking, wheeling, and cycling by all in North Kesteven.' Priority Outcomes include: • 1. Increase all residents' awareness of active travel and its associated health, wellbeing and environmental benefits. • 3. Provide more opportunities and infrastructure for active travel.	This comment setting out the overall policy framework in detail is noted.
REP1-057	Rights of Way / Recreation	The strategy identifies a range of health, environmental and economic benefits from active travel. It identifies Central Lincolnshire Local Plan policy S48 as the key framework to ensure active travel is addressed by requiring it to be designed into development proposals (see bottom of page 8). The Active Travel Strategy also explains how it relates to: • the 2023 – 2026 North Kesteven Plan across all of the Council's services; • the 2021 – 2026 North Kesteven Sport and Physical Activity Strategy; • the Council's Climate Emergency Strategy and Action Plan; • Lincolnshire County Council's Local Transport Plan 5. As part of Priority Outcome 1 above, part of the action plan for the Strategy at 4.1 on page 19 is to: *Investigate the potential for further development of 'stepping out' style routes and information for walking and wheeling.*	This comment setting out the overall policy framework in detail is noted.
REP1-057	Rights of Way / Recreation	North Kesteven Tourism Strategy 2024 – 2029 (see Appendix F to this WR for extracts) This strategy identifies that 'traditional tourism and the wider "Visitor Economy"' have a total estimated value of £201m and involves some 2.9m visits to North Kesteven in 2023. Tourism is seen as a priority for the District. It is reported that in the 2023Tourism Survey, businesses and visitors ranked the following within the top five priority actions for the strategy: • 'Improvements to the North Kesteven walking / cycling / outdoor offer • Focus on increasing visitor numbers from outside the district. • Engage more with residents, encourage them to explore their local area and discover what is on their doorstep'. Under the heading of 'Environment' the strategy identifies the following priority: *Embed the Green Thread through businesses, residents, and visitors by promoting responsible tourism, minimise environmental impact, green business support and sustainable travel making NK a sustainable location.*	This comment setting out the overall policy framework in detail is noted.

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		The Council considers that the Stepping Out Walks play a small but significant role in delivering on the Tourism Strategy; and that adverse effects on the user experience have the potential to harm that delivery.	
REP1-057	Rights of Way / Recreation	Witham Valley Country Park (WVCP) The ExA issued a procedural decision letter (PD-005) dated requesting the submission of a plan or figure indicating the location of the WVCP relative to the Order Limits. In its response to (PD-005), the applicant submitted document AS-004. This includes section 4, which describes the relationship of the WVCP to the proposed development; and refers to a new plan showing WVCP and the Order Limits as Appendix E to the Planning Statement (now AS-098). It is noted that the Planning Statement at paragraph 3.3.8 states that 'The entirety of the Principal Site is within the Witham Valley Country Park, which is a protected green space for recreation.' This might be seen as at odds with the statement in paragraph 4.1 of AS-004 that 'The Proposed Development does not encroach upon any publicly accessible recreation areas.' The Council accepts that the proposed development does not impinge on identified assets such as Hartsholme Country Park, or Whisby Nature Reserve. However, the proposed development would have an impact on public rights of way and permissive paths which form part of the recreational offer within the WVCP, and which provide access to its features such as Tunman Wood. It is the case that the WVCP is not a planning designation referred to in the development plan policies. However, the plan at Appendix D to this WR is published on the Council's website 'Countryside and open spaces' pages. For orientation purposes, the ExA will note that the plan shows Tunman Wood, and settlements such as Thorpe on the Hill, Witham St Hughs, and Bassingham. WVCP is a promoted concept, with an identified boundary and website promotion. The entirety of the main solar energy site, and a section of the main cable connection corridor, is within the WVCP mapped extent. The presence of the proposed development, and its impacts on public rights of way – especially the Stepping Out Walks – is considered to be a material consideration in the assessment of the application.	The Applicant understands that the Witham Valley Country Park is not recognised as a land based designation in the Central Lincolnshire Local Plan, but is promoted by North Kesteven District Council (NKDC) as an area within which recreation is promoted. The definition of open space for the purposes of s131 and s132 of the Planning Act 2008 (PA 2008), which draws on s19(4) of the Acquisition of Land Act 1981, is any land laid out as a public garden or used for the purposes of public recreation, or land being a disused burial ground. The parts of the Witham Valley Country Park which lie within the Order Limits, do not fall within that definition. In particular, there are no parts within the Order Limits that are used for the purposes of public recreation. It should be noted that, even if there were open space within the Order Limits, regard must be had to the provisions of s131(4B) and s132(4B) of the PA 2008 which disapply the protective provisions of s131 and s132 of the PA 2008 where the acquisition is for a temporary, although possibly long term purpose. The Proposed Development is proposed for a temporary 60-year period – that is long term, but it is nonetheless temporary. Therefore, even if the land within the Witham Valley Country Park and within the Order Limits was considered to fall within the definition of open space, the provisions of s131(4B) and s132(4B) would disapply the protective provisions of s131 and s132 of the PA 2008. Potential impacts on PRoWs, including those that coincide with promoted walking routes, are assessed in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**. The assessment treats PRoWs as part of the local recreational resource and assesses both temporary and permanent impacts arising from construction, operation and decommissioning. Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** identifies the baseline PRoW network, confirming the presence of 36 PRoWs and seven permissive paths within the Principal Site, as well as 26 PRoWs running either adjacent to or in close proximity to the Order Limits (paragraphs 12.5.30–12.5.32). This includes PRoW used by the three Stepping Out routes and those which fall within the WVCP. The assessment focuses on PRoW because they form the legally defined access network and provide consistent, comprehensive baseline data for assessing impacts on journey length, travel patterns and access opportunities, whereas Stepping Out routes are not statutory designations but are made up of existing PRoW and permissive paths. Assessing PRoW therefore inherently captures any effects on Stepping Out routes and routes within the WVCP without needing a separate assessment. As all PRoW within 500 m of the DCO Site were included, this approach fully encompasses the WVCP network where it overlaps with PRoWs, ensuring a robust, proportionate and policy-aligned assessment.
REP1-057	Rights of Way / Recreation	The Council does not claim that there are specific NPS or development plan policies which specifically afford the Stepping Out Walks or the WVCP a higher status or greater level of protection than other statutory rights of way. Nevertheless, the Council does consider that the policy framework set out above seeks the protection and enhancement of the network of public access opportunities through development as an integral part of sustainability – with a wide range of social, economic and environmental benefits. In that context, the Stepping Out Walks have been brought together over a long period, and comprise a mix of statutory rights of way and permissive	This comment is responded to in detail within the **Applicant's Response to Local Impact Reports** (ID 17.1 – 17.21) **[EN010154/EXAM/9.9]** and in its responses above.

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		paths. They are actively promoted and managed by the Council in partnership with others in order to provide a focus to achieve the aforementioned wide range of sustainable development benefits. Therefore, the Council considers that particular attention should be paid to the Stepping Out Walks when identifying the public access network baseline; assessing the effects of the development on that network; and taking opportunities to deliver appropriate enhancements. In the Council's opinion, the identified impacts on the Stepping Out Walks should be factored into the planning balance when determining the DCO application for this development.	
REP1-057	Rights of Way / Recreation	Comment raises concern that the Council has been unable to locate a plan within the application documents which identify and show existing permissive routes.	The Applicant identified existing permissive paths onsite during early site visits and sought to obtain the routes of these from NKDC and LCC. Neither council was able to provide this, and therefore the Applicant mapped these routes during site visits and in liaison with landowners. The existing permissive paths are being retained and as such are labelled as 'Retained Permissive Paths' on Figure 3-3: Proposed Permissive Paths of the ES **[AS-024]**. Secured drawings of the DCO, such as the Landscape Mitigation Plan (which forms Appendix A of the Framework LEMP **[REP1-039]**) and the Streets, Rights of Way and Access Plans **[REP1-004]** show these existing permissive paths as part of the Proposed Development; this ensures that these permissive paths form part of the application and therefore will be retained by the undertaker during operation, therefore ensuring their benefits (e.g. improving connectivity across the site) are realised by the Proposed Development.
REP1-057	Rights of Way / Recreation	Paragraph 6.3.173 of the Planning Statement (AS-098) states that construction impacts will be miminised by maintaining access along both public rights of way and existing permissive paths. APP-038 ES Chapter 13: Traffic and Transport states at 13.6.1 that construction phase impacts will be minimised by, inter alia: *d. Maintaining access to and along PRoW and the existing permissive paths or otherwise providing temporary or permanent PRoW and permissive path diversion routes where necessary to avoid any closures or potential conflicts with the Proposed Development where possible. The diversion routes will be agreed with the local authorities prior to construction, and a Framework PRoW-MP* ***[EN010154/APP/7.14]*** *has been prepared as part of the DCO application and contains further measures for PRoW and permissive path management;* Design Approach Document (APP-186) includes the following Design Principle 10: *The Proposed Development will enhance, where possible, the existing connectivity within the network of PRoW through the provision of permissive paths and circular routes to be available for public use during the operation of the authorised development to improve accessibility* However, it is not clear that this has been translated into a Design Commitment in Appendix A so as to protect and enhance existing permissive routes, as opposed to the proposed permissive routes.	Secured drawings of the DCO, such as the Landscape Mitigation Plan (which forms Appendix A of the Framework LEMP **[REP1-039]**) and the Streets, Rights of Way and Access Plans **[REP1-004]** show existing permissive paths as part of the Proposed Development; this ensures that these permissive paths form part of the application. The Framework LEMP **[REP1-039]**, a detailed version of which is to be developed, substantially in accordance with the framework plan, as secured by Requirement 8 of the Draft DCO **[REP1-007]**, sets out the proposed permissive path network that will be implemented during operation of the Proposed Development providing routes across the Principal Site and enhancing the recreational value of the Order Limits. It also sets out management controls for permissive paths (which is inclusive of existing permissive path routes). This ensures the protection and enhancement of existing permissive paths by securing their retention as part of the Proposed Development, maintaining their continued availability and the connectivity and access benefits they provide throughout the operational life of the Proposed Development.
REP1-057	Rights of Way / Recreation	Paragraph 3.1.3 of the Framework Public Rights of Way Management Plan (Rev 1) (FPRoWMP, APP-195) states that the Streets, Rights of Way and	The existing permissive paths are being retained and as such are labelled as 'Retained Permissive Paths' on Figure 3-3: Proposed Permissive Paths of the ES **[AS-024]**. Secured drawings of the DCO, such as the

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		Access Plans (AS-007) show the permissive paths within the DCO site which may require management measures. However, although those plans show the proposed permissive routes, it is not clear that all of the existing permissive routes are identified. Paragraph 3.5.10 of the FPRoWMP (APP-195) refers to a proposal to divert part of public footpath TOTH 13/1 on to an existing permissive route adjacent to the woodland edge. The FPRoWMP (APP-195) at paragraphs 1.2.6 and 3.5.3 refer the reader to the Framework Landscape and Ecological Management Plan (FLEMP, AS-101) for proposals for managing permissive paths during the operational phase. In the FLEMP (AS-101) permissive paths are dealt with in section 6. This emphasises the provision of new permissive paths, to be made available for '… up to 364 days a year during the operation of the Proposed Development.' (paragraphs 6.1.1 and 6.1.2). These permissive path provisions will cease at the end of the operational phase. Paragraph 6.1.3 refers to a network of PRoW and existing permissive paths; but again, it is not clear which permissive paths the applicant is referring to. Paragraph 6.1.4 the FLEMP states that "*A permissive path network, totalling approximately 9.5km …*" will be provided across the Principal Site. The Planning Statement (AS-098) also refers to six permissive routes to be provided at paragraph 5.3.15. The Planning Statement identifies the permissive paths provided as a benefit of 'substantial' or 'moderate' weight in the planning balance (5.3.21, 6.2.3, 6.3.74, 6.3.105, 6.3.178, 6.3.179, 7.3.7.	Landscape Mitigation Plan (which forms Appendix A of the Framework LEMP **[REP1-039]**) and the Streets, Rights of Way and Access Plans **[REP1-004]** show these existing permissive paths as part of the Proposed Development; this ensures that these permissive paths form part of the application and therefore will be retained by the undertaker during operation, therefore ensuring their benefits (e.g. improving connectivity across the site) are realised by the Proposed Development. This ensures the protection and enhancement of existing permissive paths by securing their retention as part of the Proposed Development, maintaining their continued availability and the connectivity and access benefits they provide throughout the operational life of the Proposed Development. Figure 3-3: Proposed Permissive Paths of the ES **[AS-024]** and Sheets 1-5, 7 and 9 of the Streets, Right of Way and Access Plans **[REP1-004]** show the location of the proposed permissive paths. Sheet 1 of the Streets, Rights of Way and Access Plans **[REP1-004]** shows the permanent diversion of PRoW LL|TOTH|13/1 and where this joins to proposed permissive path (PP 01/01). The Framework LEMP **[REP1-039]** (a detailed version of which is to be developed, substantially in accordance with the framework plan, as secured by Requirement 8 of the Draft DCO **[REP1-007]**) sets out the permissive path network will be implemented during operation of the Proposed Development providing routes across the Principal Site and enhancing the recreational value of the Order Limits.
REP1-057	Rights of Way / Recreation	The applicant has assessed some visual effects on rights of way users, including for the viewpoints identified on AS-059 ES Figure 10-7, and referred to in AS-120 ES Appendix 10-F Visual Assessment, listed in Table 1. APP-035 ES Chapter 10 Landscape and Visual Amenity states at paragraph 10.5.98 that recreation users of '… PRoW, Promoted Walking Routes and Cycle Routes' are identified as forming a type of visual receptor; and this is repeated in Table 10-10. AS-098 Table 1 also includes 'Recreational Users (PRoW, Promoted Walking Routes and Cycle Routes)' as a sub-heading. Permissive routes are not identified as recreational facilities within paragraphs 12.7.27 – 28 of ES Chapter 12: Socio-Economics and Land Use (AS-016). Paragraphs 12.7.29 – 12.7.34 do not appear to fully consider public rights of way in terms of the local community or tourist user experience during the operational phase of the development. The Council has not been able to identify any place within the application documents which identify and assess the impacts of the proposals on the promoted Stepping Out network of walks. Therefore, there is concern that the potential impacts on these promoted routes have not been adequately assessed and mitigated for where necessary. This includes both visual impacts on user experience (visitors and the local community), and consequences for both health and the visitor economy. These sorts of	Further consideration of each 'Stepping Out' route within the context of the PRoW network is set out within the **Applicant's Response to Local Impact Reports** (Ref ID 17.1 – 17.21) It is important to note that not all sections of these routes follow PRoW. For example, Tunman Wood incorporates permissive (non-statutory) recreational paths rather than formal PRoW, and is therefore assessed as a recreational asset within Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**. In addition, a substantial proportion of the Bassingham route lies outside the 500m study area radius from the DCO Site. Potential impacts on PRoWs, including those that coincide with promoted walking routes, are assessed in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**. The assessment treats PRoWs as part of the local recreational resource and assesses both temporary and permanent impacts arising from construction, operation and decommissioning. Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** identifies the baseline PRoW network, confirming the presence of 36 PRoWs and seven permissive paths within the Principal Site, as well as 26 PRoWs running either adjacent to or in close proximity to the Order Limits (paragraphs 12.5.30–12.5.32). This includes PRoW used by the three Stepping Out routes. The assessment focuses on PRoW because they form the legally defined access network and provide consistent, comprehensive baseline data for assessing impacts on public access, amenity and recreation, whereas Stepping Out routes are not statutory designations but are made up of existing PRoW and permissive paths. Assessing PRoW therefore inherently captures any effects on Stepping Out routes without needing a separate assessment. As all PRoW within 500 m of the DCO Site were included, this

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		impacts may be repeated across other solar farm developments in the local area, and across the rest of North Kesteven District.	approach fully encompasses the Stepping Out network where it overlaps with PRoWs, ensuring a robust, proportionate and policy-aligned assessment.
REP1-057	Rights of Way / Recreation	Stepping Out Walks A - Thorpe on the Hill The published leaflet for this walk is contained in Appendix E1 to the Council's LIR. This circular walk of 3 miles (c.5km) is described as being "… through woodland and open countryside, with lots of hedgerow birds and lovely views back to the village." The walk mainly runs along public rights of way TOTH 6/1, TOTH 6/2, TOTH 13/1, TOTH 7/3, TOTH 21/1 and TOTH 7/2. However, there is a section in the southwestern part of the path (west of Housham Wood) which is shown as running off the public rights of way, along a permissive route. In terms of the proposed alterations to the public rights of way network (shown on AS-007 Streets, Rights of Way and Access Plan), this walk would be largely unaffected. The proposed minor diversion to part of TOTH 13/1 shown on sheet 1 is not considered to be significant in itself. A proposed permissive route is shown on AS-024 sheet 1 as running south-eastwards from the southern end of TOTH 13/1 to connect the western ends of TOTH 6/3 and TOTH 6A/1. The current Thorpe on the Hill Stepping Out Walk is shown as running along part of that permissive route. A key concern of the Council would be in terms of the landscape and visual effects of the development on the experience of walkers using the route. Currently, views along the walk are largely of agricultural land and woodland, with trees and hedgerows around open arable fields; with some longer distance views. Thorpe on the Hill village is seen in that context. The development would have a significant impact on the setting of the route, and thus the user experience. Table 3-1 of AS-120 (viewpoints 2, 33 and 34) finds that there would be adverse visual effects of moderate to major significance across the lifespan and stages of the development for users of paths TOTH 6/2, TOTH 6/3, TOTH 21/1 and TOTH 7/2 – all of which coincide with or are touched on by this walking route. Table 3-2 goes on to identify moderate adverse significant effects during construction and up to at least year 1; and also during decommissioning.	Further detailed consideration of each 'Stepping Out' route within the context of the PRoW network is set out within the **Applicant's Response to Local Impact Reports** (Ref ID 17.1 – 17.21). From a landscaping perspective, of relevance to the PRoW used along Stepping Out routes, Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** concludes moderate adverse effects in Year 15 for Recreational users of PRoWs TOTH/7/2 and TOTH/11/1 during winter when there are no leaves on the vegetation.
REP1-057	Rights of Way / Recreation	B - Morton and Tunman Wood The published leaflet for this walk is attached to this WR as Appendix E2 to the Council's LIR. This circular walk of 4 miles (c.6km) is described as being *"… a peaceful journey, through open countryside and beautiful woodland."* Within the Order Limits, the walk mainly runs along public rights of way	The Applicant has responded to NKDC's comments regarding the Morton and Tunman Wood Stepping Out Walk in detail within the **Applicant's Response to Local Impact Reports** (ID 17.1 – 17.21) **[EN010154/EXAM/9.9]**.

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		TOTH12/1, TOTH 12/2, TOTH 12/3, TOTH 13/2, and TOTH 13/1. However, there is a section between the southern end of TOTH 6/3 and the eastern end of TOT 11/1 which is shown as running off the public rights of way, along a permissive route. In terms of the proposed alterations to the public rights of way network (shown on AS-007 Streets, Rights of Way and Access Plan), this walk would be largely unaffected. The proposed minor diversion to part of TOTH 13/1 shown on sheet 1 is not considered to be significant in itself. A proposed permissive route is shown on AS-024 sheet 1 as running southeastwards from the southern end of TOTH 13/1 to connect the western ends of TOTH 6/3 and TOTH 6A/1 (southeast of Housham Wood Farm). A further proposed permissive path is also shown connecting the aforementioned path, heading west from the point south-east of Housham Wood Farm to join the end of public footpath TOTH 11/1. This section of permissive path might offer an alternative to part of the existing permissive route of the Morton and Tunman Wood Stepping Out Walk, albeit a somewhat longer one. A key concern of the Council is in terms of the landscape and visual effects of the development on the experience of users of this walk. Currently, users along the walk enjoy undeveloped and sometimes longer distance views. The development would have a significant impact on the setting of the route, and thus the user experience. Table 42 of AS-120 (viewpoint 29) finds that major adverse significant effects on users of TOTH 11/1 would occur during construction, and continue to be of moderate adverse significance up to at least winter in year 15 of operation; and returning to moderate adverse during decommissioning. Table 43 (viewpoints 30 and 31) finds major adverse significant effects on users of TOTH 12/3 during construction and up to at least year 1 of operation; and continuing at a moderate adverse level throughout the operational and decommissioning phases. It should also be noted for both of the above walks, that the LVIA AS-120 Table 6 assesses the visual impacts on residents of Housham Wood Farm as of moderate adverse significance during construction, up to at least the first year of operation, and during decommissioning. This view point is very close to the routes of these two walks, where users might experience similar adverse effects.	
REP1-057	Rights of Way / Recreation	C - Bassingham and Villages Circular The published leaflet for this walk is contained in Appendix E3 to the Council's LIR. This circular walk of 6.5 miles (c.10km) is described as being through villages with *"… beautiful open expanses of arable farmland in between."* The majority of the walk is	Further detailed consideration of each 'Stepping Out' route within the context of the PRoW network is set out within the **Applicant's Response to Local Impact Reports** (Ref ID 17.1 – 17.21).

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		away from the order limits to the south. However, the northern part skirts the proposed development, running along footpath NoDi 1/2 to the west of Bassingham; before using Clay Lane, a public road which heads south west towards the village of Norton Disney. In terms of the proposed alterations to the public rights of way network (shown on AS-007 Streets, Rights of Way and Access Plan), this walk would be unaffected. A short circular permissive path is shown on AS-024 as running with a field west of Clay Lane next to the northern part of the walk. However, a key concern of the Council would be in terms of the landscape and visual effects of the development on the experience of walkers using the route. Currently, views along this part of the walk are very open. Clay Lane is a single track road with no hedges either side for most of this section, giving views over open fields. The development would have a significant impact on the setting of the route, and thus the user experience. Table 38 sets out an assessment of visual impacts on Viewpoint 22, which looks west from public right of way Bass 1/1, effectively along footpath NoDi 1/2 which forms part of this Stepping Out Walk. The assessment concludes that there would be moderate adverse significant effects on footpath users at least up until year 1 of operation, reducing to minor adverse by year 15 of operation and through decommissioning. Perhaps more importantly, Table 55 of AS-120 (viewpoint 23) finds that there would be adverse visual effects of moderate significance during construction and up to at least year 1 of operation, falling to minor adverse from year 15 of operation and during decommissioning. However, this assessment relates to transitory effects on motorists, '… experienced at speed and short lived' using Clay Lane. It is suggested this places too low a value on the existing views when considering the experiences of walkers, who will spend longer traversing this area and taking in the landscape. Also, mitigation, in the form of screening on the north-western side of Clay Lane, has the potential to interrupt walkers' enjoyment of the distinctive character of this part of the route, by introducing barriers to longer distance views. As Table 55 notes, 'The views will change from open and long distance to channelled along the road'.	
REP1-057	Rights of Way / Recreation	The Council considers that the applicant may not have identified all existing permissive routes which form part of the current public access network – they are not shown on the submitted plans; and the applicant has not demonstrated that it has taken into account potential effects on all existing permissive routes.	The Applicant identified existing permissive paths onsite during early site visits and sought to obtain the routes of these from NKDC and LCC. Neither council was able to provide this, and therefore the Applicant mapped these routes during site visits and in liaison with landowners. The existing permissive paths are being retained and as such are labelled as 'Retained Permissive Paths' on Figure 3-3: Proposed Permissive Paths of the ES **[AS-024]**. Secured drawings of the DCO, such as the Landscape Mitigation Plan (which forms Appendix A of the Framework LEMP **[REP1-039]**) and the Streets, Rights of Way and Access Plans **[REP1-004]** show these existing permissive paths as part of the Proposed Development; this ensures that these permissive paths form part of the application and therefore will be retained by the undertaker during operation, therefore ensuring their benefits (e.g. improving connectivity across the site) are realised by the Proposed Development.

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REP1-057	Rights of Way / Recreation	Some adverse effects on the experience of users of public access routes, including three Stepping Out Walks, have been identified – particularly in relation to adverse visual impacts. However, the Stepping Out Walks have not been identified by the applicant as 'promoted routes', and it is it has not been shown that potential effects of the development on these routes has been properly taken into account.	Potential impacts on PRoWs, including those that coincide with promoted walking routes, are assessed in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**. The assessment treats PRoWs as part of the local recreational resource and assesses both temporary and permanent impacts arising from construction, operation and decommissioning. Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** identifies the baseline PRoW network, confirming the presence of 36 PRoWs and seven permissive paths within the Principal Site, as well as 26 PRoWs running either adjacent to or in close proximity to the Order Limits (paragraphs 12.5.30–12.5.32). This includes PRoW used by the three Stepping Out routes. The assessment focuses on PRoW because they form the legally defined access network and provide consistent, comprehensive baseline data for assessing impacts on public access, amenity and recreation, whereas Stepping Out routes are not statutory designations but are made up of existing PRoW and permissive paths. Assessing PRoW therefore inherently captures any effects on Stepping Out routes without needing a separate assessment. As all PRoW within 500 m of the DCO Site were included, this approach fully encompasses the Stepping Out network where it overlaps with PRoWs, ensuring a robust, proportionate and policy-aligned assessment.
REP1-057	Rights of Way / Recreation	Some 9.5km of new permissive routes have been proposed – but it is not clear whether these are in addition to all existing permissive routes, or whether some would replace existing routes, which is relevant to the 'planning balance' of benefits against harms. Opportunities to enhance the public access network have not been fully explored, and any potential benefits are temporary because they are time-limited to the life of the scheme.	The existing permissive paths are being retained and as such are labelled as 'Retained Permissive Paths' on Figure 3-3: Proposed Permissive Paths of the ES **[AS-024]**. Secured drawings of the DCO, such as the Landscape Mitigation Plan (which forms Appendix A of the Framework LEMP **[REP1-039]**) and the Streets, Rights of Way and Access Plans **[REP1-004]** show these existing permissive paths as part of the Proposed Development; this ensures that these permissive paths form part of the application and therefore will be retained by the undertaker during operation, therefore ensuring their benefits (e.g. improving connectivity across the site) are realised by the Proposed Development. In addition to the retained existing permissive paths, 9.5km of additional permissive paths are proposed, linking together existing walking routes and creating enhanced connections to surrounding villages.
REP1-057	Rights of Way / Recreation	The Council considers that the application has not fully assessed the potential health and economic impacts arising due to harmful effects on public access, including on user experience of the Stepping Out Walks. Impacts across a number of topic headings are reported in the LIR beyond section 17 Rights of Way and Permissive Access - including at 13.26 (visual impacts), 19.4 (access and traffic), 23.16 (socio-economics). Therefore, the LIR also refers to Stepping Out Walk impacts at 26.11 under the heading of Cumulative Effects.	Further detailed consideration of the 'Stepping Out' walks within the context of the PRoW network is set out within the **Applicant's Response to Local Impact Reports** (Ref ID 17.1 – 17.21).
REP1-057	Rights of Way / Recreation	Currently – and taking into account the full range of relevant policy documents and strategies identified above - the Council considers that the application has not demonstrated it would protect, maintain and take opportunities to improve the existing public access network, with particular reference to impacts on the experience of users of the Stepping Out Walks within and adjacent to the site. Ultimately, the Council considers that the proposals as set out do not make adequate provision to satisfy: a. criteria a) – c) of CLLP policy S48; b. Policy T1 of the Bassingham Neighbourhood Plan 2016 – 2036 (albeit that the main adverse impacts on the Bassingham and Villages Stepping Out walk would occur along part which is not within the Bassingham NP area); and c. Policy 4 of the Thorpe on the Hill Neighbourhood Plan 2016 – 2036	Further detailed consideration of the 'Stepping Out' walks within the context of the PRoW network is set out within the **Applicant's Response to Local Impact Reports** (Ref ID 17.1 – 17.21).
REP1-057	Rights of Way / Recreation	The Council considers that the applicant should do more to show that it has understood and responded to the available opportunities to protect and	In terms of accessibility and connectivity, no significant effects on PRoWs are anticipated following the assessment of the Principal Site and Cable Corridor, as set out within Chapter 13: Traffic and Transport of

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		enhance recreation and access matters, in accordance with paragraphs 5.11.24 and 5.11.30 of EN-1, and paragraphs 2.10.43 and 2.10.44 of EN-3.	the ES **[APP-038]**. Therefore, no additional mitigation measures are proposed in terms of access and connectivity. The Applicant has committed to creating approximately 9.5km of new permissive paths to supplement the existing PRoW network, linking together existing walking routes and creating enhanced connections to surrounding villages. The Framework LEMP **[REP1-039]**, a detailed version of which is to be developed, substantially in accordance with the framework plan, as secured by Requirement 8 of the Draft DCO **[REP1-007]**, sets out the permissive path network will be implemented during operation of the Proposed Development providing routes across the Principal Site and enhancing the recreational value of the Order Limits. The proposed permissive path network has evolved following feedback at the statutory consultation stage, as explained in Chapter 4 Alternatives and Design Evolution of the ES **[APP-029]**, providing more effective linkages across the site. The Proposed Development will create new permissive paths available to the public during the operational lifetime. These permissive paths include new connections around Cathedral Park; a new connection at Tunman Wood; a new connection at Thurlby; and a new circular route to the west of Bassingham. These permissive paths are secured in Requirement 17: Permissive paths and Requirement 8: Landscape and ecological management plan as set out in the Draft DCO **[REP1-007]** and in the Streets, Rights of Way and Access Plans **[AS-106]**. Furthermore, should the Proposed Development be consented, the Applicant will provide a community fund providing a sum of £400 per MW of export capacity per year. Whilst this does not form part of the DCO application and does not comprise a benefit in the context of the planning balance, it does comprise a benefit of the Proposed Development to the wider community. This community fund would be able to be utilised for local projects and causes, to be determined by the local community.
REP1-057	Grid Connection Deliverability	The Council's position is that the proposed development currently has no confirmed grid connection and no identified alternative, a matter confirmed at ISH1. Allowing the development to proceed in advance of sufficient certainty that NGNS will be delivered in a timely manner risks significant environmental harm without securing the claimed sustainable development benefits. This includes the possibility that preliminary works—such as site clearance and fencing, which are excluded from the definition of "development" under the Draft DCO—could commence without a follow-on grid connection being delivered at all. While any future grant of planning permission for NGNS would be a significant regulatory milestone, this cannot be treated as a foregone conclusion and would remain subject to full scrutiny and an as-yet-uncertain determination timetable. Accordingly, the Council seeks the inclusion of an additional Requirement within Schedule 2 of the Draft DCO preventing any part of the development, including preliminary works, from commencing until planning permission has been granted for NGNS, adopting a consistent approach to that taken in the Springwell Solar Farm examination. This position is supported by EN-1, which encourages integrated or coordinated applications for generation and grid infrastructure and requires clear evidence that there are no obvious reasons why related proposals would be refused. The Council considers that the applicant's high-level reliance on National Grid website statements is insufficient to meet this policy test and that this matter warrants further scrutiny by the Examining Authority.	The Applicant does not consider there to be justification for the imposition of a requirement to restrict the commencement of the Proposed Development until such time as planning permission has been granted for the proposed National Grid Navenby Substation. At the time of writing, the anticipated timeline provided for the Navenby Substation on the National Grid's website estimates that a planning application under the Town and Country Planning Act 1990 (TCPA 1990) will be submitted to NKDC in early 2026 for permission to construct and operate the Navenby Substation. It is currently estimated by National Grid that the application will be determined in Spring 2026 and, subject to approval, construction is hoped to begin mid/late 2026. Based on these timescales, the estimated completion date will be late 2029. The Applicant would like to reiterate that it does not have any information beyond that which is in the public domain, and that this anticipated timeline based on National Grid's estimates, although accurate at the time of writing, is subject to change. As stated above, according to National Grid, the currently estimated completion date is late 2029 which is around 3.5 years ahead of the connection date for the Proposed Development. The Applicant has secured a grid connection for the Proposed Development, as detailed in the Grid Connection Statement **[APP-200]**, meaning that it has been allocated a connection bay at the Navenby Substation. In the event there were a delay to National Grid's currently estimated timetable, this would be highly unlikely to impact the Proposed Development. On the basis that National Grid takes a responsible approach to siting, design and mitigation, in compliance with the 'Horlock Rules', and given the generally supportive national and local policy position, there are no obvious reasons known to the Applicant why consent for the Navenby Substation and associated overhead lines to connect it into the national grid would be withheld.

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			Furthermore, the Applicant understands from National Grid that, should planning permission is not granted, the fall back is to appeal any such refusal to the Planning Inspectorate and await determination. Therefore, there is nothing to create any doubt surrounding the deliverability of the Navenby Substation. As such, a requirement is not necessary for inclusion in the Draft DCO.
REP1-057	Battery Energy Storage System and Fire Safety	The Council largely defers to the Lincolnshire Fire and Rescue Service (LFRS) on BESS safety matters. Following on from the discussion on this topic as part of Issue Specific Hearing 2, the Council maintains its position that BESS involves evolving technologies with novel risks, particularly to human health from fire. The perception of risk is capable of being a material planning consideration; while LFP battery technology is understood to offer improved thermal and chemical stability relative to other lithium-ion chemistries, the Council advises the Examining Authority to have regard to advice from LFRS and the UK Health Security Agency. The Council considers that BESS safety should be examined in detail through the Examination, including battery technology selection and the scope to secure the safest available system at the detailed design stage, should consent be granted. Until LFRS requirements are confirmed and an appropriate monitoring contribution secured, the Council's position is that the proposals do not comply with CLLP policies S14 and S54.	With regards to potential health impacts associated with the BESS, such as fire risk, as set out within the Framework BSMP **[REP1-041]** (ref. paragraph 2.3.5) the centralised BESS and distributed BESS will be located a minimum of 200m and 150m respectively from the closest residential receptors, which will mitigate any potential significant effects on nearby receptors in the unlikely event of a fire. Appendix 14-G Unplanned Emissions Assessment of the ES **[APP-176]** assesses the impact of airborne chemicals and gases produced in the event of a BESS fire and shows that the dilution of gases and the distance from the BESS is sufficient to avoid any exceedances of airborne gas safety levels. The Framework BSMP **[REP1-041]** is a key document produced as part of the DCO application that addresses the safety measures proposed for the BESS, which has been developed in close coordination with the LFRS. The detailed BSMP will be developed in accordance with Requirement 7 of Schedule 2 of the Draft DCO **[REP1-007]**, which requires that the chosen BESS work (i.e. Work No. 2 or Work No. 3) must not commence until a BSMP has been submitted to the relevant planning authority and approved, in consultation with the EA and LFRS. Requirement 7 also provides that the detailed BSMP must be substantially in accordance with the Framework BSMP **[REP1-041]**.

4.2 Lincolnshire County Council [REP1-055]

Table 4-2: Applicant's Responses to Local Authorities

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REP1-055	Alignment with Government Objectives	Comment acknowledging that the Proposed Development aligns with the government's objectives as set out within the National Policy Statements (NPS) and key national government commitments. Positive impacts in terms of the potential to deliver significant Biodiversity Net Gain (BNG) through the creation of mitigation and enhancements and some enhancement to the Public Right of Way (PRoW) network are proposed as part of the development. There are also some limited socio-economic benefits, the potential creation of employment opportunities and increased spend on local services during the construction phase. However, these would be time-limited and therefore need to be balanced against any negative impacts (as identified within our LIR). These positive impacts are not considered to outweigh the negative, some significant, impacts that arise given the overall size and scale of the development, both on its own and in combination with the other large scale energy development and NSIP scale solar projects proposed in this geographical area	As part of the DCO Application the Applicant has provided a comprehensive ES assessing the environmental impact of the Proposed Development. As detailed in Chapter 16: Summary of Environmental Effects of the ES **[APP-041]**, during construction there is potential for significant adverse landscape and visual, and vibration effects, and during operation the potential for significant beneficial ecology and nature conservation effects, and adverse landscape and visual effects. The Applicant acknowledges LCC's comments and has responded in detail to LCC's Local Impact Report within the Applicant's Response to Local Impact Reports **[EN010154/EXAM/9.11]**. With regards to the weighing of positive and negative impacts, Section 7.3 of the Planning Statement **[AS-098]** provides the planning balance explaining that the Proposed Development provides substantial benefits in terms of low carbon energy generation, contribution to decarbonisation, ecological enhancements, the provision of permissive paths, employment generation and economic growth. Taken as a whole, these benefits comprise substantial positive weight in the planning balance. Section 7.3 of the Planning Statement **[AS-098]**, sets out that having had regard to all important and relevant matters, it is concluded that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean that the DCO should not be made. The harm identified to designated and non-designated heritage assets, landscape character and visual amenity, from the temporary loss of agricultural land is clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in the energy NPSs.
REP1-055	Impacts on Landscape Character	A significant negative impact upon the landscape character and visual amenity both individually and cumulatively with other projects, which results in the conclusion that the scheme would be contrary to CLLP policies S5 (Development in the Countryside), S14 (Renewable Energy) and S53 (Design and Amenity). By reason of its mass and scale, the development would lead to significant adverse effects on landscape character and visual amenity at all main phases of the scheme. The development has the potential to transform the local landscape by altering its character on a large scale and consequently affect a wider regional scale landscape character, through significant land use change.	The effects on landscape and visual amenity are set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement **[AS-117]**. The assessment considers the impacts of the Proposed Development on landscape character areas at a national, regional, district, and local level, as well as the landscape character of the Order Limits itself. The landscape and visual assessment undertaken for the Proposed Development identified significant effects on landscape character at a district, local and site level during construction and Year 1 of operation. However, the assessment concluded that by Year 15 of operation, significant landscape effects would be limited to areas in which the solar PV infrastructure is principally located i.e the Principal Site and the local landscape character areas, demonstrating the localised nature of landscape impacts. The Applicant acknowledges that there is the potential for cumulative effects as a result of the combined impact of the Proposed Development together with other energy schemes proposed in the area and recognises local concerns regarding the concentration of energy developments in Lincolnshire. A detailed cumulative

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			effects assessment has been provided in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. The Applicant has appraised the Proposed Development against policies relevant to landscape in Section 6 of the Planning Statement **[AS-098]** concluding that the Proposed Development is in accordance with the relevant landscape and visual impact planning policies taken as a whole, noting that there are some adverse and beneficial effects. With mitigation measures incorporated into the design where possible, the Proposed Development is considered to align with the relevant objectives of the NPS, NPPF, and local planning policies. National and local planning policy relevant to landscape is also considered in Appendix B National Policy Accordance Tables and Appendix C Local Policy Accordance Tables of the Planning Statement **[AS-098]**. The Applicant has appraised the compliance of the Proposed Development against Policies S5 Development in the Countryside, S14 Renewable Energy and S57 The Historic Environment in Appendix C Local Policy Accordance Tables of the Planning Statement **[AS-098]**. During operation (assessed as year 15) it is considered there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development in combination with other developments.
REP1-055	Impacts on defining characteristics of the area	Concerns that replacement of large areas of agricultural or rural land with solar development will affect the current openness, tranquillity and agricultural character that are identified as defining characteristics of the area. The alteration of views within an agricultural or rural landscape to that of a landscape with large scale solar development would also result in significant adverse effects on views from receptors.	The Applicant acknowledges that there will be some landscape and visual effects as a result of the Proposed Development. The landscape and visual amenity effects are set out in Chapter 10: Landscape and Visual Amenity of the Environmental Statement **[AS-117]**. The assessment considers the impacts of the Proposed Development on landscape character areas at a national, regional, district, and local level, as well as the landscape character of the Order Limits itself. The landscape and visual assessment undertaken for the Proposed Development identified significant effects on landscape character at a district, local and site level during construction and Year 1 of operation. However, the assessment concluded that by Year 15 of operation, significant landscape effects would be limited to areas in which the solar PV infrastructure is principally located i.e the Principal Site and the local landscape character areas, demonstrating the localised nature of landscape impacts. The Proposed Development design has been an iterative process, informed by a suite of technical studies to identify constraints and opportunities across the Order Limits, as discussed in Chapter 4: Alternatives and Design Evolution of the ES **[APP-029]**. As a part of the design evolution, landscape and visual effects have been reduced by both embedded mitigation and sensitive design. The Framework LEMP **[REP1-039]** outlines the landscape and ecology impact avoidance measures that would be implemented prior to, and during, construction of the Proposed Development, as well as the habitat restoration, enhancement, management and monitoring measures to be implemented once the Proposed Development is operational.
REP1-055	Built Heritage Assessment	Comment that the Applicant's assessment underestimates the scale of harm to several designated and non-designated receptors, particularly where the contribution of setting and group value has been overlooked. Based on the information submitted at this stage, the proposal would result in harm to built heritage assets that has not been convincingly justified	The Applicant acknowledges LCC's comments regarding the scale of harm to designated and non-designated receptors and has responded in detail to this comment raised within LCC's Local Impact Report. The Applicant considers that harm to built heritage assets has been appropriately considered within ES Chapter 7: Cultural Heritage **[APP-032]** and does not agree there will be harm to other built

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		and further assessment and mitigation will be required to demonstrate compliance with planning policies.	heritage assets or that the harm is in any way underestimated. The Applicant's responses are contained within the **Applicant's Response to Local Impact Reports [EN010154/APP/9.11]**. In addition, to address the comment regarding group value, it is the intention to submit a Technical Note (to be submitted to the Examination at a future examination deadline), which would discuss the historic farmstead group in the vicinity of the DCO Site Boundary (both designated and non-designated), their collective value, setting and potential effects on those values as a result of the Proposed Development. The Applicant's intention to submit this additional note was communicated to the LCC Historic Buildings & Landscape Officer and NKDC Conservation Officer via email on 28 January 2026.
REP1-055	Adverse impacts on heritage assets	The development would result in adverse impacts on the setting of designated and non-designated heritage assets. The significance and special interest of the identified assets would be eroded by the change in landscape character arising from the solar farm and associated infrastructure.	The Applicant acknowledges LCC's comments regarding "*adverse impacts on the setting of designated and non-designated heritage assets*" though would like to stress, as per Historic England guidance, that setting is not itself a heritage asset and as such the assessment of impact must be directed to any change to the heritage significance of an asset (not just the change to the setting). The Applicant considers that harm to built heritage assets, as a result of change within their setting, has been appropriately considered within ES Chapter 7: Cultural Heritage **[APP-032]** (and Appendix 7-D Detailed Heritage Asset Setting Assessment **[APP-127]**). The Applicant has responded in detail to this comment raised within LCC's Local Impact Report, with the Applicant's responses contained within the **Applicant's Response to Local Impact Reports [EN010154/APP/9.11]**.
REP1-055	Archaeology	Comment that the Proposed Development would have a negative impact on heritage assets due to the potential for slight adverse impacts on archaeology being identified. As such it is considered the proposed development would have a negative impact on heritage assets and would be contrary to CLLP policy S57.	The Applicant has appraised the Proposed Development against policy relevant to the historic environment in Section 6 of the Planning Statement **[AS-098]**, concluding that the Proposed Development is in accordance with national and local policy with regard to the historic environment. National and local planning policy relevant to the historic environment is also considered in Appendix B National Policy Accordance Tables and Appendix C Local Policy Accordance Tables of the Planning Statement **[AS-098]**. Regarding policies from the Central Lincolnshire Local Plan, these have been addressed individually in Appendix C: Local Policy Accordance Tables of the Planning Statement **[AS-098]**. This includes an assessment of the policy compliance of the Proposed Development with regards to the historic environment, including Policy S57 The Historic Environment.
REP1-055	Loss of BMV Land	A significant and permanent negative impact as a consequence of the loss of Best and Most Versatile (BMV) agricultural land is identified. The proposal involves the loss of 282.9ha BMV land. This loss is not only of concern at a local level, but significant when considered in combination with the loss of land from other NSIP-scale solar developments that are also being promoted and considered across Lincolnshire, contrary to CLLP policy S67 (Best and Most Versatile Agricultural Land).	The Applicant does not agree that 282.9ha (or 699 acres) of BMV land is lost (relating to the reversible change of use to Solar PV Array elements of the Proposed Development). The long-term, temporary nature of the Proposed Development is reversible. After decommissioning the land would be restored to its original grade or better before being returned to the landowners for its current use, allowing the resumption of agriculture. Although it would be at the discretion of the landowners as to how the land is used post-decommissioning, any change of land use would require planning permission. As set out in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** (ref. paragraph 12.7.44), the only areas of agricultural land considered to be permanently lost as a result of the Proposed Development are areas of planting and habitat creation introduced as part of the Proposed Development given that land within the Cable Corridor (outside of the Principal Site) will be returned to

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previous land use upon completion of the construction phase, and all infrastructure within the Principal Site will be removed upon decommissioning of the Proposed Development. This will be undertaken in line with the mitigation secured via the Framework DEMP **[REP1-035]** and Framework SMP **[REP1-038]**, detailed versions of which are to be provided, to be substantially in accordance with the respective frameworks, as secured via Requirement 20 and Requirement 15 of Schedule 2 to the Draft DCO **[REP1-007]** respectively.

The extent of the areas considered as permanently lost are based upon the current landscaping designs presented in the Landscape Mitigation Plan, which forms Appendix A of the Framework LEMP **[REP1-039]**, whereby planting and habitat creation amount to a total use of 4.6ha (11.4 acres) of agricultural land, of which 1.5ha (3.7 acres) is BMV land (Subgrade 3a). This is noted as likely to be beneficial to the soil resource, although it is acknowledged that the magnitude of impact relates to the withdrawal of land from agricultural production, and therefore is established as a minor adverse effect in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** (ref. paragraph 12.7.44).

With regards to consideration of the potential cumulative impacts associated with the Proposed Development in combination with other solar farm proposals in the area, cumulative effects and interactions between the Proposed Development and other solar NSIPs are assessed in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. The short list of cumulative developments, inclusive of the relevant solar proposals in the area, has been agreed with both NKDC and LCC. This agreed short list of cumulative developments is provided in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. As set out in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** (ref. paragraph 12.10.15) estimates for the County of Lincolnshire, derived for previous NSIPs in Lincolnshire, estimate the proportion of BMV land to be in the order of 71%, based on extrapolation from available mapping. It is estimated that the solar NSIPs in Lincolnshire, together with the Proposed Development, account for approximately 1.4% of the BMV land in the County. Whilst there is a degree of uncertainty around this proportion it is indicative that the solar NSIPs represent a small proportion of BMV land in the County. The assessment concludes that the cumulative effect on agricultural land associated with the Proposed Development remains not significant when considered at the County level (i.e. no greater than the effect of the Proposed Development in isolation).

The Applicant has appraised the Proposed Development against policies relevant to agricultural land in Section 6 of the Planning Statement **[AS-098]** setting out that the use of BMV land requires justification in accordance with paragraphs 5.11.12 and 5.11.34 of NPS EN-1, the Written Ministerial Statement ‘Solar and protecting out Food Security and Best and Most Versatile Land’ (May 2024) and Policies 14 and 67 of the Central Lincolnshire Local Plan. Parts of the Principal Site and the Cable Corridor are located on BMV land although this is the lowest grade possible, subgrade 3a, as set out above. The Site Selection Report as set out in **Appendix A: Site Selection Report** of the Planning Statement **[AS-098]** demonstrates that a sequential approach has been taken in relation to BMV land, with the initial search being conducted with all BMV land excluded. Given a suitable site was not identified on this basis, BMV land was re-introduced. Whilst a suitable site was identified that included BMV land, the extent of BMV land included was kept to the minimum. During the design evolution process, the Design Principle related to agricultural land informed decision making. Section 6 of the Planning Statement

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			[AS-098] also provides justification for the inclusion of BMV land given that the Proposed Development contributes to supporting net zero and the security of supply in addition to contributing to affordability and the reduction of costs for consumers. The substantial benefits of the Proposed Development are low carbon renewable energy generation, contribution to decarbonisation, ecological enhancements, provision of permissive paths, job creation and economic benefits, as set out in section 5.3 of the Planning Statement **[AS-098]**. As set out in the Planning Statement **[AS-098]** the inclusion of BMV land is justified, based on site selection, design evolution and the need and benefits of the Proposed Development. National and local planning policy relevant to agricultural land is also considered in Appendix B National Policy Accordance Tables and Appendix C Local Policy Accordance Tables of the Planning Statement **[AS-098]**. The Applicant has appraised the compliance of the Proposed Development against Policy S67 Best and Most Versatile Agricultural Land in Appendix C Local Policy Accordance Tables of the Planning Statement **[AS-098]**.
REP1-055	Socio-Economic Impact	The potential for several negative socio-economic impacts have been identified. These include significant pressure on local services, particularly accommodation, due to the temporary construction workforce, with cumulative impacts acknowledged as major.	The Applicant has responded in detail to comments relating to Socio-Economics within Table 7-6 of the **Applicant's Response to Relevant Representations [REP1-047]** (Page 268 onwards). As summarised in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]** (ref. paragraph 15.5.24), significant adverse cumulative effects are identified on landscape and visual amenity receptors, however the significance of effect attributed to the Proposed Development alone is not increased when considering these other developments alongside the Proposed Development, as reported in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The following significant cumulative effects were established during construction, where the magnitude of effect is higher than that of the Proposed Development in isolation. During construction: • Major Adverse (significant) landscape cumulative effects upon the North Kesteven District landscape sub-area Witham and Brant Vales due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction. Additionally, changes are anticipated to the visual amenity of users of the Viking Way (PRoW Cole/2/1 and BooG/2/2) as a result of the Proposed Development together with ID95 Application Reference: PL/0087/23, North Hykeham Relief Road, resulting in a Major adverse effect which is significant. • Moderate Adverse (significant) landscape cumulative effects on the North Kesteven landscape sub-area Limestone Heath due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction as a result of the Proposed Development together with ID63 Application Reference: EN010149, Springwell Energy Farm and ID103 Application Reference: EN0110016, Leoda Solar Farm, resulting in a Moderate adverse effect which is significant. No significant cumulative effects have been identified on Socioeconomic and land use receptors.
REP1-055	Assessment of Socio-Economics Impact	Concerns that the ES does not assess the economic impact of reduced agricultural output, nor the broader effects on the food supply chain and that the combined socio-economic	The Applicant recognises that there are concerns relating to the potential for the Proposed Development to impact upon agricultural production. An assessment of

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		effects of the Proposed Development and other NSIPs are considered substantial and insufficiently analysed or mitigated within the application.	economic impacts resulting from the Proposed Development is presented in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**, consistent with the approach set out in the Homes and Communities Agency (HCA), (now known as Homes England) guidance 'Additionality Guide, A Standard Approach to Assessing the Additional Impacts of Projects, 4th Edition'[1]. The economic impact assessment undertaken uses typical appraisal methods and is appropriate to, and aligns with best practice in, the assessment of economic impacts at planning stage where it is not possible to identify factors such as financial values in relation to commodities due to the construction start date being some years in the future. Accordingly, loss of crop production has been taken into account in assessing the impact on agricultural employment that would be associated with this activity. As noted in paragraph 12.7.52 of this chapter, it has been confirmed by all landowners that there is not expected to be any job losses as a result of the removal of agricultural land, as it is expected that when the rent revenues from the land used for the Proposed Development start, there will be additional offsite jobs created on their farms as landowners diversify their land further with the underlying financial stability of the rental income. The Applicant acknowledges LCC's comments on issue of food security and has responded in detail to this in response to LCC's Local Impact Report. The Applicant's responses are contained within the **Applicant's Response to Local Impact Reports [EN010154/APP/9.11]**. Cumulative effects and interactions between the Proposed Development and other solar NSIPs are assessed in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. It is estimated that the solar NSIPs in Lincolnshire, together with the Proposed Development, account for approximately 1.4% of the BMV land in the County of Lincolnshire. Whilst there is a degree of uncertainty around this proportion (based upon available data and associated limitations of study) it is indicative that the solar NSIPs represent a small proportion of BMV land in the County. All of these developments will be reversible and the land is projected to be returned to agriculture on decommissioning, except for relatively small areas used for habitat creation, such as woodland planting, which is anticipated to be retained, and no significant effects on agricultural land were identified for any of the solar NSIPs identified in Section 12.10 Cumulative Assessment of Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**.
REP1-055	Community Benefit	Comment that further measures to mitigate against negative impacts must be considered to ensure community gain across a range of areas.	The Applicant recognises the need for local people to benefit from the proposals. This has been thoroughly considered throughout the evolution of the design of the Proposed Development, with input from the local community shaping the final design of the Proposed Development. For example, the proposed permissive path network has evolved following feedback at the statutory consultation stage, as explained in Chapter 4 Alternatives and Design Evolution of the ES **[APP-029]** to maximise community benefits, providing more effective linkages across the site. Once the Proposed Development is operational there will be approximately 9.5 km of new permissive paths created, linking together existing walking routes and creating enhanced connections to surrounding villages, as well as the provision of a 1.8ha (4.4 acres) new community orchard with open access within the landscaping designs, offering a direct benefit for the local community.

[1] Additionality

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			The Framework LEMP **[REP1-039]**, a detailed version of which is to be developed, substantially in accordance with the Framework, as secured by Requirement 8 of Schedule 2 to the Draft DCO **[REP1-007]**, sets out that the permissive path network will be implemented during operation of the Proposed Development providing routes across the Principal Site and enhancing the recreational value of the Order Limits. Furthermore, should the Proposed Development be consented, the Applicant will provide a community benefit fund providing a sum of £400 per MW of export capacity, per year. Whilst this does not form part of the DCO application and does not comprise a benefit in the context of the planning balance, it does comprise a benefit of the Proposed Development to the wider community. This community benefit fund would be able to be utilised for local projects and causes, to be determined by the local community. The Applicant believes those communities living closest to the Proposed Development should benefit from it – with these communities being best placed to recommend what a 'community benefit' should be. The Applicant is currently investigating how a community benefit fund could be managed and delivered independently. One way of doing this is by appointing a community foundation which would independently manage the fund, using their local knowledge to identify funding opportunities and help maximise benefits for local communities. A community benefit fund would only operate if the Proposed Development received development consent. To maximise the economic benefits to the local community a Framework ESSC Plan **[APP-197]** identifies potential opportunities for activities relating to skills, supply chain and employment which the Applicant could take forward post-consent. The Framework ESSC Plan **[APP-197]** also outlines the Applicant's intentions to engage with local schools, local further education providers, local higher education providers. The Applicant recognises that the Proposed Development can assist academic research by linking with local Universities and provide local schools with learning opportunities. Furthermore, the Framework ESSC Plan **[APP-197]** provides a structure for delivering ways under which local community members can put forward their ideas and the project can then maximise local benefits. The development of a detailed ESSC Plan, which is to be substantially in accordance with the Framework, is secured by Requirement 19 of Schedule 2 to the Draft DCO **[REP1-007]**. As concluded in Chapter 12: Socio-economics and Land Use of the ES **[AS-016]**, there are no adverse socio-economic effects as a result of the Proposed Development that require mitigation to be provided. This includes employment, skills and the supply chain. Therefore, this is an enhancement measure rather than mitigation for any effects. Other wider benefits are detailed in Section 5.3 of the Planning Statement **[AS-098]**, including energy security, decarbonisation, ecological enhancements, employment generation and economic benefits.
REP1-055	Temporary closure of PRoW	Comment that the temporary closure of multiple footpaths during the construction phase is likely to result in a detrimental impact on the accessibility and functionality of the wider PRoW network.	No PRoW will be completely closed during the construction phase of the Proposed Development. Some PRoW may need to be temporarily closed to facilitate the safe construction of the Proposed Development. Where a PRoW is proposed for temporary closure, a diversion route has been proposed for the duration of the closure, with the original PRoW to be fully reinstated upon completion of the

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			relevant works. The SRoWA Plans **[REP1-004]** show each proposed temporary PRoW closure, as well as the corresponding proposed indicative location of temporary PRoW diversion. Potential impacts on Public Rights of Way are assessed in Chapter 12: Socio-economics and Land Use of the ES **[AS-016]**. There are 36 PRoW and seven permissive paths located within the Principal Site, as well as 26 PRoW which run alongside the Order Limits or are within close proximity to the Principal Site. Furthermore, there are five PRoW which could be impacted by the Cable Corridor. The Proposed Development would require the permanent diversion of three PRoW, with minimal changes in journey length experienced by users, each of which is assessed to result in a negligible effect, which is considered not significant. Some PRoW may need to be temporarily closed to facilitate the safe construction of the Proposed Development. Where a PRoW is proposed for temporary closure, a diversion route has been proposed for the duration of the closure, with the original PRoW to be fully reinstated upon completion of the relevant works. The Streets, Rights of Way and Access Plans **[AS-106]** show each proposed temporary PRoW closure, as well as the proposed indicative location of the corresponding temporary PRoW diversion. The Framework PRoWMP **[APP-195]** outlines how the Applicant will manage PRoW within the Order Limits to ensure they continue to operate effectively throughout the construction, operation (including maintenance) and decommissioning of the Proposed Development. The Framework PRoWMP **[APP-195]** considers both user safety and accessibility, during the complete life cycle of the Proposed Development, considering the potential interaction and impact on the PRoW associated with the construction and decommissioning works, as well as the day-to-day operation of the Proposed Development. PRoW will be managed throughout the construction phase to ensure that existing routes can continue to be used safely throughout the duration of the proposed works. Some PRoW may need to be temporarily closed to facilitate the safe construction of the Proposed Development. Where a PRoW is proposed for temporary closure, a diversion route has been proposed for the duration of the closure, with the original PRoW to be fully reinstated upon completion of the relevant works. The SRoWA Plans **[REP1-004]** show each proposed temporary PRoW closure, as well as the corresponding proposed indicative location of temporary PRoW diversion. From a traffic and transport perspective, no significant effects on PRoW users are anticipated following the assessment of the Principal Site and Cable Corridor, as set out within Chapter 13: Traffic and Transport **[APP-038]** of the ES.
REP1-055	Public Health	Comment that the Application does not adequately address the potential impacts of the development on public health, particularly mental health.	Assessments relating to human health are included within the Environmental Statement. In line with the approach set out in the Scoping Opinion (Appendix 1-B: EIA Scoping Opinion of the ES **[APP-199]**), Chapter 5: EIA Methodology of the ES **[APP-030]** explains (ref. paragraph 5.1.11) that potential effects to human health are considered within the relevant ES technical chapters. This notes the following ES chapters: • Chapter 9: Water Environment **[REP1-021]**; • Chapter 10: Landscape and Visual Amenity **[AS-117]**; • Chapter 11: Noise and Vibration **[APP-036]**;

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• Chapter 13: Traffic and Transport **[APP-038]**; and
• Chapter 14: Other Environmental Topics, Section 14.2: Air Quality **[APP-039]**.

In line with the methodology set out in Chapter 5: EIA Methodology of the ES **[APP-030]** (ref. paragraph 5.9.12) and within the impact assessment methodology for each of the technical chapters as relevant, consideration is inherently given to human health receptors where relevant within each of the technical assessments. For example, noise and vibration, air quality and EMF assessments consider the potential for direct effects upon human receptors, and each of these have specific health limits/thresholds set for the protection of sensitive members of the population.

Regarding mental health, the Proposed Development has been iteratively and holistically designed to minimise its potential impacts on health and wellbeing. This has been achieved through undertaking a comprehensive and robust Environmental Impact Assessment and consultation process to identify and implement beneficial design opportunities, such as the implementation of 9.5km of permissive paths within the Proposed Development design that are proposed to be made available for recreational purposes, thereby delivering a tangible health and wellbeing benefit. The Framework LEMP **[REP1-039]** (a detailed version of which is to be developed, substantially in accordance with the Framework LEMP, as secured by Requirement 8 of Schedule 2 to the Draft DCO **[REP1-007]**) explains that the permissive path network will be implemented during operation of the Proposed Development providing routes across the Principal Site and enhancing the recreational value of the Order Limits.

Measures set out in the Framework CEMP **[REP1-031]**, Framework OEMP **[REP1-033]**, Framework DEMP **[REP1-035]** and Framework LEMP **[REP1-039]** will reduce or avoid mental health related impacts. These include measures such as new planting to screen views and by removing the solar PV in Field 46 to avoid a significant visual effect from any residential dwellings during the operational lifetime of the Proposed Development. The provision of a detailed CEMP, a detailed OEMP, a detailed DEMP and a detailed LEMP, to be substantially in accordance with the respective frameworks, is secured under Requirement 12, Requirement 13, Requirement 20 and Requirement 8 respectively of Schedule 2 to the Draft DCO **[REP1-007]**.

Furthermore, Requirement 5 of Schedule 2 to the Draft DCO **[REP1-007]** secures the establishment of a Community Liaison Group (CLG) prior to commencement of the Proposed Development. It should be noted that the Applicant has already established this CLG with the initial meeting having taken place in April 2025. The CLG will continue throughout the construction of the Proposed Development, and by virtue of Requirement 5 of Schedule 2 to the Draft DCO **[REP1-007]**, will continue until the date of final commissioning of the Proposed Development, which will be the start of the operational phase.

The CLG provides an opportunity for the local community to engage with the Applicant, learn about the detailed design process post consent, express concerns, and be kept up to date. It is expected that the group will play an important role in helping to reduce and minimise stress and contribute to

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			wellbeing. In addition, should the Proposed Development be granted consent, the Applicant will provide a community benefit fund providing a sum of £400 per MW per year of export capacity. This community benefit fund would be able to be utilised for local projects and causes, as determined by the local community. The Applicant believes those communities living closest to the Proposed Development should benefit from it – with these communities being best placed to determine what a 'community benefit' should be. The Applicant is currently investigating how a community benefit fund could be managed and delivered independently. Whilst the community benefit fund does not form part of the DCO Application, and therefore does not comprise a benefit in the context of the planning balance, it does comprise a benefit of the Proposed Development for the wider community. In the light of the fact that PINS has already determined that a standalone section on health impacts was not required within the ES, in the light of the assessment that is included within the ES and which does not identify any likely significant impact of the proposed development on human health and in the absence of the Council itself failing to identify any likely significant impact of the proposed development upon mental health, the Council's request for a mental health impact assessment is not considered to be proportionate or justified.
REP1-055	Minerals and Waste	Comment that the proposed 60 year lifespan of the development far exceeds the Minerals and Waste plan period and therefore it is difficult for the Applicant to confirm whether or not any of the mineral resources that sit within the confines of the current MSA areas might be required to come forward well in advance of the solar site being decommissioned.	Whilst the lifespan of the Proposed Development exceeds the timeline of the updated Lincolnshire Minerals and Waste Local Plan, which will have a plan period up to 2041, the Applicant notes that LCC is unable to confirm whether any mineral resources in the Mineral Safeguarding Area will be required before the Proposed Development would be decommissioned. As set out in the Appendix 12-C: Minerals Safeguarding Assessment of the ES **[AS-091]**, given the reversible nature of the Proposed Development, there will be no permanent sterilisation of the mineral resource, and the ability of future generations to extract the resource over the long term will not be compromised. Furthermore, given the large landbank of sand and gravel and limestone in Lincolnshire, the Proposed Development will not inhibit extraction within the timescale that the mineral is likely to be needed and will ultimately have a negligible impact on sterilising the mineral resource. In addition, there are a number of locations where the thickness of the mineral is negligible or limited meaning extraction would not be economical. The land take for the Cable Corridor is small, and thus the area of potential sterilisation would be negligible. The working area will be in the order of 30-40m wide and the trench containing the cables in the order of 2 or 3m width. The Cable Corridor is wider to provide the Applicant with flexibility at detailed design following geotechnical surveys, pre construction ecology checks, and the final design by other schemes such as Brant BESS which will share the Cable Corridor if they go ahead.
REP1-055	Waste Facilities	Comment on lack of waste facilities for recycling of solar panels and associated equipment and associated capacity issue, as additional facilities would be required to ensure products are sustainably disposed of.	The Applicant is mindful that local facilities for recycling solar waste do not exist at present, however there are solar panels recycling companies in the UK which have the ability to recycle solar panels in small quantities. The construction and day-to-day operation will generate small amounts of solar panels e.g. based on a failure rate of 0.05%, 316 solar PV panels per year (39 m^3). Chapter 14 Other Environmental Topics **[APP-39]** paragraph 14.5.85 states that "recycling routes are generally available for decommissioning materials at present, and it is likely that there will be even greater opportunities for recycling in the

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			future, not least because the market will have expanded to meet demand as solar PV installations increase." As outlined in the Examining Authority's Recommendation Report for the East Yorkshire Solar Farm dated 17 February 2025, at paragraph 3.13.50, "*While the capacity of facilities to deal with the decommissioned solar PV panels is still evolving, I see no reason to disagree with the Applicant's view that the system will respond to demand over time. There is nothing to suggest that the type or number of panels involved in the application scheme would lead to particular difficulties in this regard.*" Therefore, the Applicant considers it reasonable to assume that solar panel recycling will expand to meet demand as solar PV installation increase.
REP1-055	Cumulative Impacts of multiple developments in Lincolnshire	Concerns regarding the nature and scale of current and emerging proposals relating to large scale solar developments and other NSIP scale developments in Lincolnshire. Six NSIP-scale solar schemes have been granted a DCO in Lincolnshire and a further seven schemes (including Fosse Green) are either progressing through examination or are at pre-application stage. The County is host to a number of other NSIP projects, including five Great Grid Upgrade proposals and a new Lincolnshire reservoir. The cumulative effects of the Fosse Green Energy Park, in combination with other major infrastructure developments identified, could be considerable. The cumulative impacts of the Fosse Green Energy Park, combined with the other developments identified (both TCPA and NSIP) could be significant and include landscape and visual effects, the long-term loss of BMV agricultural land, socio-economic factors and waste.	The Applicant acknowledges that there is the potential for cumulative effects as a result of the combined impact of the Proposed Development together with other energy schemes proposed in the area and recognises local concerns regarding the concentration of energy developments in Lincolnshire. A detailed cumulative effects assessment has been provided in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. The cumulative effects assessment followed a staged approach and considered relevant developments and land allocations within a 10km radius from the Proposed Development, including NSIPs. A wider county level study area was used for the cumulative effects assessment in relation to BMV Agricultural Land which considers other Solar NSIPs within the County of Lincolnshire. The cumulative effects assessment (Section 15.5 of Chapter 15: Cumulative Effects and Interactions **[APP-040]**) has adequately assessed impacts of the Proposed Development together with the identified cumulative schemes during the construction, operational and decommissioning phases (noting effects during decommissioning were assumed to be no worse than effects during construction). The temporal overlap of cumulative schemes with the Proposed Development, including the overlap of construction phases was an important consideration during the assessment of cumulative effects. Therefore, the potential for cumulative effects resulting from construction disruption has been appropriately assessed in the ES. As summarised in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]** (ref. paragraph 15.5.24), significant adverse cumulative effects are only identified on landscape and visual amenity receptors, however the significance of effect attributed to the Proposed Development alone is not increased when considering these other developments alongside the Proposed Development, as reported in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The following significant cumulative effects were established during construction, where the magnitude of effect is higher than that of the Proposed Development in isolation. During construction: • Major Adverse (significant) landscape cumulative effects upon the North Kesteven District landscape sub-area Witham and Brant Vales due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction. Additionally, changes are anticipated to

Ref. No.	Theme	Lincolnshire County Council Written Submission / Summary of Written Submission	Applicants Response to Written Submission
			the visual amenity of users of the Viking Way (PRoW Cole/2/1 and BooG/2/2) as a result of the Proposed Development together with ID95 Application Reference: PL/0087/23, North Hykeham Relief Road, resulting in a Major adverse effect which is significant. • Moderate Adverse (significant) landscape cumulative effects on the North Kesteven landscape sub-area Limestone Heath due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction as a result of the Proposed Development together with ID63 Application Reference: EN010149, Springwell Energy Farm and ID103 Application Reference: EN0110016, Leoda Solar Farm, resulting in a Moderate adverse effect which is significant. During operation (by year 15) it is considered there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development in combination with other schemes. The potential for significant cumulative landscape and visual effects of other solar NSIPs at greater distances from the Proposed Development has also been considered within the Joint Interrelationship Reports prepared for the respective examinations of such schemes, including, Springwell Solar Farm **[EN10149]**, Tillbridge Solar Project **[EN010142]**, West Burton Solar Project **[EN010132]**, and Cottam Solar Project **[EN010133]**. These Reports found that, given the notable distances and lack of intervisibility between these schemes and the Proposed Development, there was no potential for significant cumulative effects. The Proposed Development has been subject to an iterative design process to minimise impacts on local communities. Embedded mitigation measures include new planting, enhanced management of existing vegetation, and the introduction of offsets to reduce visibility of infrastructure from nearby settlements such as Norton Disney. These measures are designed to reduce the visual dominance of the development and limit the contribution of the Proposed Development to cumulative landscape and visual effects.

5. Applicant's Response to Written Representations at Deadline 1 – Parish Councils

5.1 Coleby Parish Council [REP1-059]

Table 5-1: Applicant's Response to Parish Councils – Coleby Parish Council

Ref. No.	IP Name	Theme	Coleby Parish Council Written Submission / Summary of Written Submission	Applicants Response to Coleby Parish Council Written Submission
REP 1-059	Coleby Parish Council	BESS	Concerns regarding battery storage on the Site. Is it more than necessary for the function of a solar energy project of this size, and therefore relative to the application? The summary detail of the project is stated as being the 'installation of solar photovoltaic panels, associated … on site energy storage facilities' etc. We interpret this as being that the BESS is to be used for on-site production, as there is no mention of BESS for storing off-site energy. That is a completely different scenario.	The main purpose of the BESS is to increase the operational efficiency of the on-site solar PV panels by ensuring that energy generated by them can be stored when demand is low and released to the grid when it is needed. The BESS will also support the wider grid by providing a balancing mechanism that enables the import of power from, and the export of power to the grid. In this way battery storage will play a key role in transitioning to net zero with the additional storage capacity also benefitting the wider electricity system. The Planning Statement **[AS-098]** and Statement of Need **[APP-184]** both discuss the supporting planning policy for co locating a BESS with solar PV and highlight the ability of this combination to support the National Electricity Transmission System. The inclusion of a BESS will be a major contributing factor to the success of the Proposed Development by ensuring that surplus electricity generation on peak sunny days is stored rather than wasted, but also in its ability to support the wider Electricity System by importing electricity when there is excess electricity in the National Electricity Transmission System and exporting it when demand is high.
REP 1-059	Coleby Parish Council		Confirmation required that the Proposed Development would apply the current National Fire Chiefs Council (NFCC) guidance	The BESS layout has been developed in consultation with the LFRS and has taken account of guidance from the NFCC. Communication with the LFRS will continue through the detailed design and construction stages. It should be noted that a SoCG is currently under preparation with LCC which will include matters for the LFRS, including the BESS, and will be submitted at the midpoint of Examination, in line with the Examining Authority's request in its Procedural Decision dated 22 August 2025 **[PD-005]**.
REP 1-059	Coleby Parish Council	Statutory Consultees	Request for the UK Health and Security Agency to report on the Proposed Development	The UK Health and Security Agency have been consulted throughout the life cycle of the Proposed Development. The Applicant's response to the UKHSA's Relevant Representation (RR-285) is presented within Table 2-6 of the **Applicant's Response to Relevant Representations [REP1-047]**.
REP 1-059	Coleby Parish Council		The Government's NPS EN-3 Para 2.10.21 states that sites for solar energy projects should be on brownfield land, previously developed land, contaminated or industrial land, or lastly on lower quality agricultural land. The National Planning Policy Guidance (NPPG) has guidance on large scale ground-mounted solar developments, one of which recommends consideration whether land is being used effectively, recommending the developments are focused on previously developed and non-agricultural land. The Central Lincolnshire Local Plan Policy S5 Development in the Countryside, states the rural location of an enterprise should justified by means of proximity to existing established businesses or natural features. Also, the development is of a size and scale commensurate with the	In developing the Proposed Development, the Applicant has considered the energy National Policy Statements, (NPS EN-1, NPS EN-3 and NPS EN-5), the National Planning Policy Framework, the Central Lincolnshire Local Plan and the relevant neighbourhood plans. Accordingly, Appendix B National Policy Accordance Tables and Appendix C Local Policy Accordance Tables of the Planning Statement **[AS-098]** provide an appraisal of the Proposed Development against the relevant policies contained in these documents. In terms of Policy S5 of the Central Lincolnshire Local Plan, relating to non-residential development in the countryside, the Applicant explains in Appendix C Local Policy Accordance Tables of the Planning Statement **[AS-098]** the

			proposed use and with the rural character of the location. The village of Thorpe on the Hill is particularly impacted by this proposed development, because of the amount of land that falls within their parish boundaries, but also, the aspects which contravene their Neighbourhood Plan. The latter also affects other villages, as well as the impact on Conservation villages. These are some examples of the choice of site not aligning with Government, county or local policies. Leading on from the proposed site being positioned on quality productive farmland, is that the National Grid was duty bound to respond to this request, so is now in the process of applying for a Sub Station on similar quality agricultural land. This continues a chain reaction, there is the proposed Leoda Solar, and two BESS application, plus others not in the public domain, that are sited on similar land - the reason being this is a rural farming area. There is no justification for the solar developments in this area, the cumulative effect which will snowball once any of these are approved will be devastating, there will be large areas of industrialisation in a rural farming area.	process of site selection, accessibility, other uses and that given the Proposed Development helps meet the urgent need for low carbon renewable energy, as set out in NPS EN-1, there is a clear and accepted case for the Proposed Development. Furthermore, that the Design Approach Document **[APP-186]** demonstrates how the design of the Proposed Development has evolved with a clear Design Vision and Design Principles, resulting in positive outcomes including the delivery of sustainable infrastructure that is sensitive to place. The Applicant has responded to comments relating to Site Selection in detail within Table 7-12 of the Applicant's Response to Relevant Representations **[REP1-047]**. A full assessment of the site selection process is provided in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**. It concludes that the location of the Proposed Development comprises a suitable site when compared with other potential alternative sites and taking into account planning and environmental constraints and operational considerations. Consultation on the Proposed Development was ongoing throughout the design process prior to submission, as detailed in the Consultation Report **[APP-023]** and Consultation Report Appendices **[APP-024]**. As stated on their website, National Grid is bringing forward the proposed National Grid substation near Navenby alongside the Great Grid Upgrade which seeks to upgrade the grid in order to connect homes, businesses and public services to sources of home-grown renewable energy in order to lower electricity bills and make the UK more energy secure. National Grid states on its website that based on current demand around Navenby, it is not possible to connect everything proposed in the area to existing regional substations such as Bicker Fen. To connect new developments to the network, they have identified that a new 400 kilovolt (kV) substation is needed but it should be made clear that, whilst the Proposed Development will connect into the proposed National Grid substation near Navenby, it is not driving the Navenby substation development. As set out in Section 2.3 of Appendix A: Site Selection Report of the Planning Statement **[AS-098]**, following a review of available capacity in the transmission network, the Applicant identified a line in and line out connection into the 400kV Overhead Line close to Whisby Hall. A desk top review of the site to consider planning and environmental constraints, concluded that the site was viable, and accordingly, a formal application was made to National Grid for a connection into the 400kV Overhead Line. However, National Grid informed the Applicant that this point of connection (POC) was not available and instead was offered and subsequently secured a POC at the proposed National Grid substation near Navenby, which was a location capable of serving multiple customers, including the Applicant. Therefore, as demonstrated, the Applicant considered existing points of connection prior to securing a connection at the proposed National Grid substation near Navenby.
REP 1-059	Coleby Parish Council	Food Security	Another prong to this situation is food security. This is an equally important national issue, but it is also a part of achieving net zero, and should therefore be taken into account when considering this application. In conclusion of the above, the Council urges the Inspector to prioritise the Guidance in NPS EN-3 Para 2.10.21 when considering the Fosse Green development, to protect the quality productive farmland for the locals as well as the nation.	The Applicant recognises that there are concerns relating to the potential for the Proposed Development to impact upon food production. It is important to place the scale and nature of land use into context. As considered in ES Chapter 12: Socio-Economics and Land Use **[AS-016]**, the total land area required for the Proposed Development represents approximately 0.09% of the total farmland within the East Midlands, and therefore constitutes a very small proportion of the regional agricultural resource. Furthermore, research

				undertaken by the Applicant in 2024 indicates approximately 50% of the land within the proposed Principal Site is currently used for the cultivation of non-food crops (biofuels and animal feed). Of this, the majority (approximately 81%) is grown for use as fuels for carbon-intensive energy sources, rather than for direct human or animal consumption. As such, while the land is agricultural in character, its current use does not solely support food production. The Proposed Development would therefore result in a limited and proportionate change in land use, set against the wider regional context and the Proposed Development's contribution to cleaner energy generation. It should be noted that the Order Limits include a significant portion of retained arable land (a minimum of 181ha (447.3 acres) of retained arable land is secured via the Framework LEMP **[REP1-039]**, a detailed version of which is to be developed substantially in accordance with the framework plan, as secured under Requirement 8 of the Draft DCO **[REP1-007]**), which allows current farming practices to continue whilst also providing other benefits, such as mitigation for ground nesting birds. This retained arable land includes approximately 116ha (286.6 acres) of Subgrade 3a BMV agricultural land.
REP 1-059	Coleby Parish Council	Cable Corridor	Comment requesting that more detail is provided on the size of, and what permanent physical features, will be above ground level for the 10km length of the corridor, once the Proposed Development is complete. This should also include whether or not any features above ground will be removed at the Decommissioning stage. This information is necessary to assess whether the impact of the development is acceptable or not.	All high voltage cables for onsite connections and grid export will be buried underground, there will be no above ground physical features. The only above ground cables are those that may be attached to the rear of panels. The undergrounding of the cables is included within the relevant Work Numbers of the Proposed Development Parameters **[REP1-029]** – this is secured by Requirement 6 Detailed design approval of the Draft DCO **[REP1-007]**. As stated, Section 2.3 of the Framework DEMP **[REP1-035]** provides flexibility as to the method of cable decommissioning. Cables and cable ducting could either be left in situ or removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open up the entire length of the Cable Corridor. The mode of cable decommissioning for the Cable Corridor and interconnecting cables will be dependent upon government policy, the preferences of the County Council and best practice at the time of the decommissioning phase. Should the County Council wish for the connection cables to be removed, this would be discussed and agreed prior to decommissioning. The above ground infrastructure associated with the Proposed Development will be removed during decommissioning with only areas of planting and habitat creation remaining.
REP 1-059	Coleby Parish Council	Access and Amenity	Concern regarding impact of the Cable Corridor on PRoWs and the Viking Way, including the impact on shops, cafes and Public Houses in Coleby and Navenby. Comment requesting that these routes will be kept open at all times during construction, operation and decommissioning as they are essential routes for locals and visitors.	Chapter 12 Socio-economics and Land use of the ES **[AS-016]** includes an assessment of potential effects on tourism/recreation arising from the Proposed Development (ref. Section 12.7) comprising consideration of impacts on local accommodation facilities, recreational receptors and visitor attractions. Section 12.5 identifies the size of the visitor economy and recognises that the villages of Coleby, Bassingham, Navenby and Aubourn contain visitor and recreational attractions, and that there is also a network of Public Rights of Way (PRoWs) in the surrounding area which may be used by visitors. With due consideration given to other assessment findings set out in ES Chapter 10: Landscape and Visual Amenity **[AS-117]**, Chapter 11: Noise and Vibration **[APP-036]**, Chapter 13: Traffic and Transport **[APP-APP-038]** and Chapter 14: Other Environmental Topics (Section 14.2: Air Quality) **[APP-039]** as appropriate, the assessment in Section 12.7 concludes that overall

				the impact of the Proposed Development (including the Cable Corridor) on tourism/recreation receptors is not significant during the construction/ decommissioning and operational phases. In respect of views from/for these receptors specifically, a Framework LEMP **[REP1-039]** has been prepared to accompany the DCO application to provide visual mitigation. Section 12.7 of Chapter 12 Socio-economics and Land use of the ES **[AS-016]** also includes an assessment of potential effects on businesses arising from the Proposed Development. Taking into account the assessment findings presented in the ES Chapters set out above this assessment concludes that there would be no significant effect on local businesses during the construction/ decommissioning and operational phases. Potential impacts on PRoWs are assessed in Chapter 12: Socio-economics and Land Use of the ES **[AS-016]** (ref. paragraphs 12.7.29 – 12.7.35). There are 36 PRoW and seven permissive paths located within the Principal Site, as well as 26 PRoW which run alongside the boundary or are within close proximity to the Principal Site. Furthermore, there are five PRoWs which could be impacted by the construction of the Cable Corridor. The Proposed Development would require the permanent diversion of three PRoWs, each of which is assessed to result in a negligible effect, which is considered not significant. Some PRoWs may need to be temporarily closed to facilitate the safe construction of the Proposed Development. Where a PRoW is proposed for temporary closure, a diversion route has been proposed for the duration of the closure, with the original PRoW to be fully reinstated upon completion of the relevant works. The Streets Rights of Way and Access Plans **[AS-106]** show each proposed temporary PRoW closure, as well as the corresponding proposed indicative location of temporary PRoW diversion. The Framework PRoWMP **[APP195]** outlines how the Applicant will manage PRoWs within the Order Limits to ensure they have been suitably considered and will continue to operate effectively throughout the construction, operation and decommissioning of the Proposed Development. The Framework PRoWMP **[APP-195]** reviews both user safety and accessibility, during the complete life cycle of the Proposed Development, considering the potential interaction and impact on the PRoWs associated with the construction works, as well as the day-to-day operation of the Proposed Development.
REP 1-059	Coleby Parish Council	Industrialisation of the Landscape	The industrialisation of the landscape with solar photovoltaic panels, electrical infrastructure, security fencing and lighting, as well as large containers for BESS, changes the setting of the landscape completely. A walk in the countryside is known to improve mental and physical health, relieves stress, boosts mood and creativity, and therefore overall well-being.	While the Proposed Development comprises infrastructure for solar energy generation and associated development (such as BESS), the land is not permanently changed to industrial use in land use planning terms, and it should be noted that the Proposed Development also includes a significant amount of retained arable land. The design of the Proposed Development has sought to minimise impacts upon agricultural land, as explained in the Design Approach Document **[APP-186]** which sets out the design vision and principles that were developed at an early stage to provide a framework for design evolution. Design Principle 2, as detailed in Section 3.9 of the Design Approach Document **[APP-186]**, relates to being sensitive to existing agricultural land. This has been achieved through the retention of a significant amount of arable land within the Order Limits (the DCO commits to 181 ha (447.2 acres) of retained arable land in the Framework LEMP **[REP1-039]**). This retained arable land (which comprises a significant proportion, approximately 116 ha, of BMV agricultural land) within the Order Limits disperses the areas of solar PV array and affords both ecological benefits associated with nesting birds' habitat and economic benefits in terms of retained jobs. It should also be noted that the Proposed Development is not a

			permanent installation and once the Proposed Development's operational life ends, the infrastructure will be removed, and the land returned to its previous use in accordance with the Framework DEMP **[REP1-035]**. The Applicant is applying for a 60-year operational period for the Proposed Development, whereby under Requirement 20 of the Draft Development Consent Order **[REP1-007]**, decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of its operating life the land will be available for its current use, although the landowners would choose at that point how the land is to be used and managed. Assessments relating to human health are included within the Environmental Statement. In line with the approach set out in the Scoping Opinion (Appendix 1-B: EIA Scoping Opinion of the ES **[APP-199]**), Chapter 5: EIA Methodology of the ES **[APP-030]** explains (ref. Paragraph 5.1.11) that potential likely significant effects to human health are considered within the relevant ES technical chapters. Regarding mental health, the Proposed Development has been iteratively and holistically designed to minimise its potential impacts on health and wellbeing. Section 6.2 of the Planning Statement **[AS-098]** considers the effects of the Proposed Development on human health in the context of planning policy.
REP 1-059	Coleby Parish Council	Comment that walks within the DCO Site are promoted by the District Council, they are part of its tourism strategy as well as being used by people from the local area. The walks close to Thorpe on the Hill are particularly adversely affected by the Proposed Development, they would change from being walks by the open fields into tunnelled pathways with security fencing looking onto black glass panels. The walks would lose any potential for enhancing well-being, and eliminate the potential for visitors/tourism.	The Applicant has responded in detail to this matter within Table 7-18 of the Applicant's Response to Relevant Representations **[REP1-047],** on page 362**.**
REP 1-059	Coleby Parish Council	NPS EN-3 encourages Applicants to minimize visual impacts on public rights of way and to maximise opportunities for enhancement, the Council does not believe this has been facilitated, and that the loss of the open countryside walks in this area is not justifiable or necessary. Also, this area is part of the Witham Valley Country Park which not only promotes its diverse green spaces but also its historical sites. The proposed project will cause visual harm and harm to amenity, not only in the immediate area of the development, but in the wider area of the Country Park which covers around 40 square miles. Various Government policies expect local authorities to protect and enhance valued landscapes and sites of biodiversity, and the Council maintains that these policies should be given priority in this instance. NPS EN-3 encourages Applicants to minimize visual impacts on public rights of way and to maximise opportunities for enhancement.	Visual impacts on the PRoW network have been considered in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The siting of solar PV panels and associated infrastructure seeks to minimise instances of any elements of the Proposed Development being located on both sides of any PRoW. Where the provision of solar PV panels or associated infrastructure is proposed adjacent to a PRoW, an offset of a minimum of 10m either side of the centre line has been incorporated. Where the provision of solar PV panels or associated infrastructure is proposed on both sides of a PRoW, sections of wider offsets have also been integrated to avoid a 'canyon effect' and vary the extent of views experienced across the Principal Site where practicable. This is secured as a Design Commitment set out in Appendix A: Design Commitments of the Design Approach Document **[APP-186]** which are secured under Requirement 6 (detailed design approval) of Schedule 2 of the Draft DCO **[REP1-007]**. The Design Approach Document **[APP-186]** demonstrates that that the design of the Proposed Development does recognise and consider opportunities for increased connectivity, including measures to minimise disruption to PRoWs during construction, operation (including maintenance) and decommissioning where practicable. Enhancement measures have also been explored which include the provision of permissive paths across the Site to supplement the existing PRoW network, link existing routes. create new connections to surrounding villages and enhance existing connections. The Framework LEMP **[REP1-039]**, (a detailed version of which is to be developed, substantially in accordance with the framework plan, as secured

				by Requirement 8 of the Draft DCO **[REP1-007]**), sets out the permissive path network that will be implemented during operation of the Proposed Development to provide routes across the Principal Site and enhance recreational value within the Order Limits. In summary, the Proposed Development will minimise operational impacts by maintaining access to all existing PRoWs within the Proposed Development, with suitable alternative routes provided for the three PRoW sections that will be permanently diverted (LL/TOTH/13/1 PRoW, LL/Aubo/10/1 PRoW and LL/ThuN/2/1 PRoW) and by controlling areas where the internal maintenance route crosses any existing PRoWs or local access roads (such as providing gates) and permitting only operational traffic to utilise these internal routes within the Principal Site. Full details are provided in the Framework PRoWMP **[APP-195]** a detailed version of which, to be developed substantially in accordance with the framework plan, is secured under Requirement 18 of the Draft DCO **[REP1-007]**. Impacts on recreational receptors are assessed in Section 12.7. of Chapter 12: Socio-Economics and Land Use **[AS-016].** The assessment considers the recreational facilities within 2km of the Order Limits, including parks that form the Witham Valley Country Park Area such as the Whisby Nature Reserve. Chapter 12: Socio-Economics and Land Use **[AS-016]** concludes that overall the impact of the Proposed Development on recreation receptors is not significant during the construction/ decommissioning and operational phases.
REP 1-059	Coleby Parish Council	Best and most versatile land	Concern regarding the loss of any productive agricultural land - this project has a large portion of BMV categorised land. Such a development should not be taking place on this type of land at all if the guidelines in NPS EN-3 were being followed as detailed in 2.1, additionally, there are no reasons in this instance why there are mitigating circumstances that it should be. The loss of BMV land impacts directly on food security for the nation, the Council maintains that a solar project is not required on this land and cannot be justified. Is it beyond reasonable doubt, the Proposed Development cannot be located elsewhere, so not on BMV land? The large loss of agricultural land will be adverse and significant, and should be afforded significant weight in the planning balance.	The Applicant does not agree that BMV land would be lost. The long-term, temporary nature of the proposed development is reversible. After decommissioning the land would be restored to its original grade, with the option to resume agriculture. The use of agricultural land, including BMV land, has been carefully considered through the sensitive design of the Proposed Development in order to minimise the impact on BMV land and agricultural operations. Design Principle 2 as detailed in Section 3.9 of the Design Approach Document **[APP-186]**, relates to being sensitive to existing agricultural land and reducing development on BMV land. As set out in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**, the permanent loss of BMV land as a result of the Proposed Development relates to the permanent loss of 1.5ha of Grade 3a land to ecological enhancements, which is noted as likely to be beneficial to the soil resource, although it is acknowledged that the withdrawal of land from agricultural production has been established as a minor adverse effect. With regards to concerns relating to the potential for the Proposed Development to impact upon agricultural production, as noted in the response above relating to food security, this point is considered in ES Chapter 12: Socio-Economics and Land Use **[AS-016]**. The 1,070 ha (2644 acres) (now 1,055 following the Change Application) of agricultural land required for the Proposed Development represents approximately 0.09% of the total farmland within the East Midlands, and therefore constitutes a very small proportion of the regional agricultural resource. Moreover, research undertaken by the Applicant in 2024 indicates approximately 50% of the land within the proposed Principal Site is currently used for the cultivation of non-food crops. Of this, the majority (approximately 81%) is grown for use as fuels for carbon-intensive energy sources, rather than for direct human or animal consumption. As such, while the land is agricultural in character, its current use does not solely support food production. The Proposed Development would therefore result in a limited and proportionate change in land use, set against the wider regional context and the Proposed Development's contribution to cleaner energy generation.

REP 1-059	Coleby Parish Council	BMV Policy	CPRE – Campaign to Protect Rural England – is well respected for its work to challenge and influence government policy, and is celebrating its 100th anniversary this year. Part of its Letter to England states: *Now more than ever, decisions about how we use our land are leading to the needless loss of landscapes and everything they support. Without drastic action, much of what makes our countryside unique and beautiful will be lost. Wherever we live, we rely on the countryside for clean air, thriving wildlife and resilience in the face of climate change. Yet these foundations are being chipped away. Too often decisions are shaped by profit, not what's needed most – and the countryside pays the price*. This again relates to the cumulative effect of this development with the other proposed solar, BESS and the Sub Station at Navenby, all being on high proportions of BMV land. The fundamentals of the EN-3 guidelines being 'chipped away'.	With regards to consideration of the potential cumulative impacts associated with the Proposed Development in combination with other solar farm proposals in the area, cumulative effects and interactions between the Proposed Development and other solar NSIPs are assessed in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. The short list of cumulative developments, inclusive of the relevant solar proposals in the area, has been agreed with both NKDC and LCC. This agreed short list of cumulative developments is provided in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. As set out in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** (ref. paragraph 12.10.15) estimates for the County of Lincolnshire, derived from previous NSIPs in Lincolnshire, estimate the proportion of BMV land in the County to be around 71% of its total area, based on extrapolation from available mapping. It is estimated that the solar NSIPs in Lincolnshire, together with the Proposed Development, account for approximately 1.4% of the BMV land in the County. Whilst there is a degree of uncertainty around this proportion it gives a clear indication that the solar NSIPs represent a small proportion of BMV land in the County. The assessment concludes that the cumulative effect on agricultural land associated with the Proposed Development remains not significant when considered at the County level (i.e. no greater than the effect of the Proposed Development in isolation).
REP 1-059	Coleby Parish Council	Traffic Impacts	North Hykeham and Lincoln Bypass - The Council has concerns over the effects of traffic and transport relating to the proposed development. Looking at the traffic aspect from a local perspective is that road users are well aware of the bottle necks on the end of the A46 where it joins the start of the bypass, and down the bypass going west. If the roads in Thorpe on the Hill are full of construction traffic and workers, then the alternative routes that can currently be used, and currently are used by commuters, will be out of action, causing an even higher density of traffic on the congested road network. What plans are there to mitigate this situation?	The traffic associated with the Proposed Development will be monitored and managed through the CTMP. This will include ensuring that HGV construction traffic adheres to the defined routes and times agreed with LCC and NH. The Framework CTMP **[REP1-043]** includes a commitment to management of materials and delivery slots to avoid the morning and evening peak hours. The Framework CTMP **[REP1-043]** sets out the measures to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network, in order to limit potential disruptions and implications on the wider transport network. Production of a detailed CTMP, to be substantially in accordance with the Framework CTMP, is secured under Requirement 14 of Schedule 2 to the Draft Development Consent Order **[REP1-007]**. The Framework CTMP **[REP1-043]** also includes shift start and end times for workers to avoid staff traffic generation being coincidental with the morning and evening network peak hours. The assessment of the potential effects relating to additional construction traffic is reported within Chapter 13: Traffic and Transport **[APP-038]**. This concludes that the Proposed Development is not expected to result in any significant effects with the proposed embedded mitigation in place.
REP 1-059	Coleby Parish Council	Traffic Impacts	Concern regarding assumptions of timescales by the Applicant of their own development in relation to other major projects, thereby coming to the conclusion that their impact on traffic will be minimal. These assumptions may be hoped for, or estimations, but they are not binding. The question is, what is a worst-case scenario of overlap with the other developments in this area, that is, Springwell, Leoda, Navenby BESS, Coleby BESS and Navenby Sub Station? What would happen if the Applicant wanted to bring forward their start date for construction and the opening of the Hykeham Relief Road had been delayed in opening?	The assessment of the Proposed Development is based on the expected build out of other schemes. The cumulative impacts with other schemes are considered in Section 13.10 of the Traffic and Transport ES Chapter **[APP-038]** and have been agreed with LCC. None of the schemes identified in this comment (Springwell, Leoda, Navenby BESS, Coleby BESS and Navenby Sub Station) were expected to have a geographic or temporal overlap with the peak construction phase of the Proposed Development and therefore were not included in the cumulative assessment. However, a Detailed CTMP will be developed, based on the principles identified in the Framework CTMP **[REP1-**

				043], and submitted to LCC for approval prior to the start of construction. This will reflect any changes in the interim period. Specifically regarding the A46 Hykeham Relief Road scheme, this was progressed to the cumulative schemes shortlist in Section 13.10 of Chapter 13 Traffic and Transport of the ES **[APP-038]**, where its potential for a likely significant cumulative effect was considered. On the basis that the scheme is currently expected to be operational from 2026, no cumulative assessment of this scheme was undertaken in Chapter 13: Traffic and Transport of the ES **[APP-038]**, an approach which was approved by National Highways with respect to the assessment of the NH section of the A46 within the study area. As required under Requirement 14 of the Draft DCO **[REP1-007]**, the Applicant will work with LCC and NH in the development of the detailed CTMP, to coordinate the delivery of the Proposed Development and other projects (including the A46 Hykeham Relief Road).
REP 1-059	Coleby Parish Council	Flood Risk	National Planning and Policy Framework, para 187 asks: can it be guaranteed the development will not present unacceptable risks to surface and groundwater resources? The Council asks the same question, particularly in view of the flood risk areas around the river Witham and the Brant that flow through the site. The disposal of the huge volume of solar panels as well as the hazardous and toxic lithium-ion battery waste at the Decommissioning stage is of great concern to the Council.	Appendix 9-C: Flood Risk Assessment of the ES **[REP1-023]** discusses flood risk from all sources for the Principal Site and the Cable Route Corridor. Paragraph 4.6.2 of Appendix 9-C: Flood Risk Assessment of the ES **[REP1-023]** notes the Proposed Development scenario does not increase flood risk elsewhere and, therefore, will result in no change to flood risk. Section 4 of Appendix 9-C: Flood Risk Assessment of the ES **[REP1-023]** discusses fluvial and tidal flood risk in detail for the Proposed Development. Hydraulic fluvial modelling has been undertaken using the latest hydraulic model (2015) provided by the Environment Agency to facilitate assessment of flood risk to the Proposed Development, concluding tidal flood risk for the Proposed Development is low. The Boston barrier (the Grand Sluice) in Boston also acts as the Tidal limit for the River Witham, with a 1 in 300 year level of protection. Tidal influence from the River Trent does not impact the Proposed Development. An assessment of sea level rise has also been undertaken as reported in Section 4.4 of Appendix 9-C: Flood Risk Assessment of the ES **[REP1-023]** for both the Upper Witham and River Trent catchments, with mitigation provided to ensure solar PV panels can remain operational in times of flood and that they do not increase flood risk elsewhere, when excluding the Boston Barrier defences for the Upper Witham assessment. Appendix 9-D: Framework Surface Water Drainage Scheme (SWDS) **[REP1-025]** sets out the approach to surface water management. Surface water runoff will be collected and drained to surface water bodies, either to watercourses, or in certain cases, to ground where a watercourse is not present in the vicinity. Runoff to watercourses will be limited to the rate that would naturally occur from the site before development (Qbar greenfield rates) for all design storm events, including those occurring as a result of climate change, thereby reducing peak runoff rates during significant storm events and providing betterment downstream of the Proposed Development and elsewhere. The provision of a detailed SWDS, to be substantially in accordance with the framework plan, is secured under Requirement 10 of the Draft DCO **[REP1-007]**. With regards to the disposal of panels, over 95% of the solar PV infrastructure can be recycled. As stated in the Materials and Waste section of ES Chapter 14: Other Environmental Topics **[APP-039]**, the Proposed Development will aim to prioritise waste prevention, by preparing for reuse, recycling and recovery and lastly disposal to landfill as per the waste hierarchy. The anticipated waste streams during decommissioning are set out in Table 14-7

				Estimated Decommissioning Waste within ES Chapter 14: Other Environmental Topics **[APP-039]**. With the embedded mitigation measures in place, the overall quantities of decommissioning waste to be disposed of to landfill are anticipated to be below 1% of regional inert and non-hazardous landfill capacity and less than 0.1% of national hazardous landfill capacity. The assessment concludes that significant waste effects are not expected during decommissioning of the Proposed Development.
REP 1-059	Coleby Parish Council	Decommissioning	Has sufficient detail been provided for the decommissioning framework? What guarantee is there that the decommissioning will properly be dealt with and paid for in full by the Applicant, or any subsequent owner? The Council is concerned that the underground grid connection cable corridor will be left in situ at the decommissioning stage, and that this will lead to toxins and PFAS leaching into the soil and watercourses as the casings and wires deteriorate over time. Can the development be classed as temporary, if infrastructure is left in place?	With regards to decommissioning and land restoration, at the end of the operational period the above ground infrastructure will be removed and the land returned to the landowners for future use, in accordance with the Framework DEMP **[REP1-035]**, secured through the Draft DCO **[REP1-007]**, which is legally binding, and will be approved by the relevant Local Planning Authority prior to the end of the operational period. The DCO process provides a legally enforceable mechanism requiring the Applicant to deliver decommissioning. The Applicant considers that the measures within the Draft DCO provide an appropriate and proportionate level of assurance that decommissioning and restoration will occur at the end of the project's life. This is in line with other consented solar NSIPs in Lincolnshire, including Tillbridge Solar Project and West Burton Solar Project. As stated, Section 2.3 of the Framework DEMP **[REP1-035]** provides flexibility as to the method of cable decommissioning. Cables and cable ducting could either be left in situ or removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open up the entire length of the Cable Corridor. The mode of cable decommissioning for the Cable Corridor and interconnecting cables will be dependent upon government policy, the preferences of the County Council and best practice at the time of the decommissioning phase. Should the County Council wish for the connection cables to be removed, this would be discussed and agreed prior to decommissioning. The Applicant will assess at the time of decommissioning as to the balance of environmental impact of removing the cables (given current guidance is to leave them in situ to avoid soil disturbance) and the impact of leaving the cables in situ. This process will be included in the DEMP that will be agreed with the local authority at the time of decommissioning.

5.2 Harmston Parish Council [REP1-061]

Table 5-2: Applicant's Responses to Parish Councils – Harmston Parish Council

Ref. No.	IP Name	Theme	Harmston Parish Council Written Submission / Summary of Written Submission	Applicants Response to Harmston Parish Council Written Submission
REP 1-061	Harmston Parish Council	Traffic Management	Concern regarding traffic management of the vehicles (both HGV and LGV/cars used by contractors) during both the construction phase as well as the subsequent operational phase of the project. The Traffic Management Plan (Framework CTMP/EN01054/APP/7.18) and other supporting documentation highlights that up to 600 LGVs/car movements a day will occur during the 18 month construction phase for the solar array which could be extended if the Battery Energy Storage System on site is also approved. Although under current plans, the North Hykeham Relief Road will have been completed by the end of 2028 - prior to the start of the FGE construction phase - there is no clarity and some contradictory statements within the documentation on the routing of both the HGV traffic as well as the LGV/cars used by contractors en-route to the site.	An assessment of the potential effects relating to additional construction traffic including on severance, driver delay, road traffic incidents and safety is carried out within Chapter 13: Traffic and Transport of the ES **[APP-038]**, in accordance with the legislation and planning policy outlined in Appendix 13-A: Traffic and Transport Policy and Legislation **[APP-163]**. This concludes that the Proposed Development is not expected to result in any significant effects with the proposed embedded mitigation in place within the Framework CTMP **[REP1-043]**, which is secured under Requirement 14 of Schedule 2 to the Draft Development Consent Order **[REP1-007]**. including no significant disruption to local residents and businesses. The assessment has used the shortest expected construction programme (24 months), which provides a worst-case scenario in terms of construction vehicle trips as this is based on a rapid, and so shorter, construction period that would generate the highest number of peak hour and daily road trips on the local network. LCC and National Highways in their respective capacities as local highway authority and highway authority for the strategic road network, have deemed the impacts on the road networks as a result of the Proposed Development to be acceptable in principle (**[RR-157]** and **[RR-201]**). Adequate traffic management measures to ensure safe driving will be implemented as set out within the Framework CTMP **[AS-102]**, a detailed version of which is to be produced, substantially in accordance with the framework plan, as secured under Requirement 14 of the Draft DCO **[REP1-007]**. This includes measures to limit when vehicles can travel to and from the Site in order to avoid peak traffic times. A monitoring system would be put in place along the route of all HGVs travelling to and from the Site which would record any noncompliance and communicate any issues with the relevant contractors/suppliers and the Framework CTMP **[AS102]** also provides details of enforcement measures should there be any instances of noncompliance. Other traffic (e.g. LGVs and cars) has been considered within the assessment presented in Chapter 13: Traffic and Transport of the ES **[APP-038]**, as set out in paragraph 13.4.65. No formal routing is proposed for non-HGV vehicles, however it is anticipated that they would in general follow main roads/ routes to access the Proposed Development. As stated in the Framework CTMP **[AS-102]** paragraph 5.4.5, a shuttle bus service will be utilised to transport construction workers from the Principal Site to the relevant Cable Corridor access (and vice versa) to reduce vehicular trips on the surrounding highway network. Regarding operational impacts, as set out in paragraph 13.4.21 of Chapter 10 Traffic and Transport of the ES **[APP-038]**, through the EIA Scoping process, the Planning Inspectorate has agreed that the potential impacts do not need to be considered in detail during the operation (and maintenance) phase as part of the EIA for the Proposed Development. This is, as set out in paragraph 13.4.11, because during the operational phase, activity on-site will be minimal

Ref. No.	IP Name	Theme	Harmston Parish Council Written Submission / Summary of Written Submission	Applicants Response to Harmston Parish Council Written Submission
				and would be restricted principally to vegetation management, equipment maintenance and servicing (including battery maintenance), replacement of any components that fail, and monitoring to ensure the continued effective operation of the Proposed Development.
REP 1-061	Harmston Parish Council	Traffic Management	Comment regarding "*APP-038 Para 13.4.67. Although the Proposed Development is located close to several villages/settlements including Thorpe on the Hill, Haddington and Bassingham, only a small proportion of trips are expected to either originate from or pass through these villages.. Any such trips are expected to be local construction worker trips and not HGV trips ….." However, the next paragraph (13.4.68) states "Where practicable, the Framework CTMP* ***[EN01054/APP/7.18]*** *will restrict HGVs to routes which avoid these villages ….*" Hence, there appears to be conflicting statements viz a viz no HGVs (effectively being banned) or only no HGVs when it is PRACTICABLE. Furthermore, having specifically stated in APP-038 Para 13.4.67 that HGV trips will not pass through Haddington, APP-110 (Figure 13-4) shows HGVs being routed through the village. So when the Applicant states "where practicable" it in fact appears to be planned that that HGVs will go through these villages. or the village of Harmston with its constrained and limited road infrastructure such clarity is essential to ensure that no construction traffic associated with the project utilises any routes through the village en route to the development. We would request that the ExA ensures that this constraint is placed on the developer and reflected in their traffic management plans.	Harmston Parish Council has correctly identified that Paragraph 13.4.67 **[APP-038]** fails to acknowledge HGVs would be able to use the roads through Harmston, Haddington and Thurlby. Paragraph 13.4.68 uses the words 'where practicable' because, although for the majority of the HGV route it does avoid villages, it is not practical to avoid these three villages. Figure 13-4: Heavy Goods Vehicle (HGV) Routing of the ES **[AS-072]** shows the HGV routings associated with the Principal Site through Haddington and Thurlby, whilst HGVs associated with the Cable Corridor are shown as routing through Harmston . As stated in Paragraph 13.4.67 of Chapter 13: Traffic and Transport, only a small proportion of trips are expected to either originate from or pass through these villages during the construction, operation, or the decommissioning phases. The assessment of the potential effects relating to additional construction traffic is carried out within Chapter 13: Traffic and Transport of the ES **[APP-038]**. This concludes that the Proposed Development is not expected to result in any significant effects (including the links and junctions associated with Harmston) with the proposed embedded mitigation in place, as secured by the Framework CTMP **[REP1-043]**. This is agreed by LCC who state in paragraph 11.18 of their Local Impact Report **[REP1-053]** (that "*Subject to the necessary mitigations being secured and implemented, the Council concludes that traffic and transport impacts of this development during all phases of the development would be neutral.*"
REP 1-061	Harmston Parish Council	Compliance with Traffic Management	There is a commitment to measures such as ANPR and fixed cameras being used to ensure compliance with the traffic management plan. We would seek to ensure those capabilities are deployed on Church Road and Vicarage Lane on the eastern side of the village and at the bottom of Station Road on the western side of the village so that compliance can be assured and monitored.	The locations of the ANPR cameras used to monitor HGV compliance within the Framework CTMP (REP1-043) will be subject to agreement as part of the Detailed CTMP in consultation with LCC.

5.3 Norton Disney Parish Council [REP1-062]

Table 5-3: Applicant's Responses to Parish Councils – Norton Disney Parish Council

Ref. No.	IP Name	Theme	Norton Disney Parish Council Written Submission / Summary of Written Submission	Applicants Response to Norton Disney Parish Council Written Submission
REP 1-062	Norton Disney Parish Council	Visual Screening	Comment regarding the Examining Authority's final first written questions (specifically LV.1.04) – concern regarding the visual impact for users of PRoW by Parish residents and that this would not be amenable to mitigation measures. Reference is given to Clay Lane and its extensive use as a PRoW for leisure, exercise and promotion of wellbeing. Comment that there are no roadside hedgerows along the northern verge of Clay Lane for its entire length leading to unimpeded views across agricultural land (Field 62 on Sheet 8 of Figure 7.15-1 in the Framework LEMP). Concern regarding the objective of mitigating the visual impact of the Proposed Development would be counterproductive as hedgerows would destroy the visual and recreational amenity currently enjoyed by our residents. Concern that no alternative mitigation measure is available.	The Applicant has had regard to the provision of hedgerows and their management as a means of sensitively integrating the Proposed Development into its landscape setting in its commitment to good design and definition of project design principles in the Design Approach Document **[APP-186]**. As such, the Applicant is not proposing to manage all hedgerows at 3m across the whole Order Limits. The Framework LEMP (Revision 3) **[REP1-039]** notes (ref. paragraph 5.3.13) that where screening is not the primary purpose of a proposed hedgerow, for example where the embedded setback is considered sufficient to reduce the level of effect such that it is not significant in EIA terms, the hedgerows will be maintained at 3m or lower to maintain open views of the countryside. Notwithstanding the above, it is acknowledged that there will be instances where the introduction of hedgerows will result in the loss of openness in some views and this has been considered within the assessment contained at ES Chapter 10: Landscape and Visual Amenity **[AS-117]**. For example, on recreational users of PRoW TOTH/7/2, TOTH/21/1, TOTH/6/2 and TOTH/6/3 which traverse the Principal Site, it is noted that at operation the view will change from long distance and open to short distance and channelled by new vegetation and therefore a Major adverse effect is reported at Year 1 and at Year 15 (winter). Should it become apparent that a section of existing or proposed hedgerow is required to be managed at lower heights then options for design refinement will be explored prior to the commencement of the authorised development, through the detailed design and the detailed LEMP as set out in Requirement 6 and 8 of the Draft Development Consent Order (DCO) **[REP1-007]** respectively, such that the level of effects reported within ES Chapter 10: Landscape and Visual Amenity **[AS-117]** would remain valid. The specific management of the vegetation within the Order Limits will be detailed within the detailed LEMP which will be prepared prior to the commencement of the authorised development as secured by Requirement 8 of the Draft DCO **[REP1-007]**. As per Requirement 8, the detailed LEMP must be submitted to and approved by the relevant planning authority, following consultation with LCC, Natural England and the Environment Agency. Regarding the visual impacts on recreational users of Clay Lane, there is more than one Clay Lane near the Order limits. . The Clay Lane near Norton Disney is a non-classified highway, not an adopted PRoW, and as such Chapter 10: Landscape and Visual Amenity (Rev 2) **[AS-117]** of the ES has assessed the impact on visual amenity of users of Clay Lane on this basis. The potential for clear, close-range views of the Proposed Development has

				influenced the conclusions of Moderate adverse (significant) effects at construction and Year 1 of operation. By Year 15 of operation, the effects are anticipated to reduce to Minor Adverse (Not Significant) on the basis that the proposed and existing hedgerows will screen and filter views of the Proposed Development such that the exposure to views of solar PV infrastructure will be substantially reduced.
REP 1-062	Norton Disney Parish Council	Visual Screening	Comment regarding the Examining Authority's final first written questions (specifically LV.1.05) the ExA questions the effectiveness of the proposed roadside screen planting and notes its own observation made while undertaking its unaccompanied site inspection 1 (USI 1) that throughout the area of the Proposed Development all roadside hedgerows appear to be subject to managed pruning, resulting in hedgerows in the winter period being around 1.5m to 2.0m in height above carriageway level. The ExA asks in LV.1.05 b) "*If the proposed roadside hedgerow planting was to be pruned in the manner observed by the ExA during its USI1, would those hedgerows provide effective screening for the proposed development? For example would the proposed array area occupying field 62 on sheet 8 of Figure 7.15-1 in the FLEMP* ***[Appendix A in AS-101]****, adjoining Clay Lane west of Bassingham and east of Norton Disney be effectively screened by the proposed roadside hedgerow planting?*" The opinion of Norton Disney Parish Council is that hedgerows of 1.5m to 2.0m in height would not provide effective screening for the proposed development and that hedgerows any greater in height would be profoundly obtrusive in this environment.	The Framework LEMP (Revision 3) **[REP1-039]** proposes that all existing hedgerows to be retained will be managed to achieve a minimum height of 3m and where overshading of solar panels is not of concern then these will be managed at greater heights. As set out in the response above, where screening is not the primary purpose of a proposed hedgerow, for example where the embedded setback is considered sufficient to reduce the level of effect such that it is not significant in EIA terms, the hedgerows will be maintained at 3m or lower to maintain open views of the countryside. With regard to the example of the proposed array area occupying Field 62 on sheet 8 of Figure 7.15-1: Landscape Mitigation Plan in the Framework LEMP (Appendix A) in **[REP1-039]**, adjoining Clay Lane west of Bassingham and east of Norton Disney, the roadside hedgerows would be managed to screen the proposed array area and would therefore likely be managed at 3m or higher. There are likely to be instances across the Order Limits where the effectiveness of screening from proposed roadside hedgerow planting would be less if they were managed at 1.5m to 2.0m in height above carriageway level. However, the extent of this will be very much context-specific and will depend on factors such as topography, presence of other vegetation, and distance between the viewer and edge of built development. Should it become apparent that a section of existing or proposed hedgerow is required to be managed at lower heights then options for design refinement will be explored prior to the commencement of the authorised development, through the detailed design and the detailed LEMP as set out in Requirement 6 and 8 of the Draft Development Consent Order (DCO) **[REP1-007]** respectively, such that the level of effects reported within ES Chapter 10: Landscape and Visual Amenity **[AS-117]** would remain valid. NKDC will also review the detailed design and LEMP, in consultation with LCC, prior to and as part of its responsibility to discharge the relevant DCO Requirements. At this stage the Applicant will liaise with County Highways to agree the management regime for the hedges bounding the solar PV infrastructure on the boundary of roads.

5.4 Scopwick and Kirkby Parish Council [REP1-063]

Table 5-4: Applicant's Responses to Parish Councils – Scopwick and Kirkby Parish Council

Ref. No.	IP Name	Theme	Scopwick and Kirkby Parish Council Written Submission / Summary of Written Submission	Applicants Response to Scopwick and Kirkby Parish Council Written Submission
REP 1-063	Scopwick and Kirkby Parish Council	Community Feedback	Concern that community feedback has not been meaningfully reflected in the evolution of the Proposed Development	Engagement with the local community and with the relevant local authorities has been an integral part of development of the design of the Proposed Development. The Applicant held both Non-Statutory and Statutory Consultation where views were sought. The Consultation Report Appendices **[APP-024]** set out how the Applicant has considered feedback provided at Non-Statutory and Statutory Consultation. Furthermore, the Design Approach Document **[APP-186]** explains how the Applicant has responded to feedback provided on the design of the Proposed Development. In addition, as set out in the Consultation Report **[APP-023]**, the Applicant has been in regular communication with officers from LCC and NKDC to seek technical feedback and views on approaches to consultation amongst other matters. In summary, the Applicant has pro-actively engaged with the local community and local authorities, as demonstrated in the Consultation Report **[APP-023]** and Design Approach Document **[APP-186]**. Changes to the design have been made in the vicinity of Thorpe on the Hill in response to feedback received from Thorpe on the Hill Parish Council and local residents during statutory consultation to reduce the impact of the Proposed Development. This has included the removal of solar PV within the field south-east of Thorpe on the Hill, which is now an area of managed arable fields for bird mitigation purposes (i.e. no solar infrastructure proposed), to increase the distance from the village to the Proposed Development itself, and providing additional vegetation screening along Fosse Lane. As such, the Proposed Development design provides a 300m buffer between the proposed solar infrastructure and residential receptors in Thorpe on the Hill. See Figure 3-2A of the ES **[AS-022]** and the Framework LEMP **[REP1-039]** for details. The Design Approach Document **[APP-186]** provides further details of all the design changes made in response to responses made to non-statutory and statutory consultation, the outcomes of environmental assessment and national and local planning policy.
REP 1-063	Scopwick and Kirkby Parish Council	Best and Most Versatile Land	The proposed development would permanently remove extensive areas of high-grade, productive agricultural land from food production. The loss of Best and Most Versatile (BMV) land for industrial-scale energy infrastructure is contrary to long-term objectives for food security, sustainable land management and rural livelihoods. The Parish Council does not accept that the destruction of successful farming land is justified, particularly when viable alternatives exist. These include rooftop solar, brownfield and previously developed land, offshore wind, and Small Modular Reactors, all of which would avoid the irreversible loss of prime agricultural soils.	With regards to the loss of agricultural land, this has been carefully considered through the site selection process (as set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**) and also through the sensitive design of the Proposed Development in order to minimise the impact on BMV land and agricultural operations. Appendix A: Site Selection Report of the Planning Statement **[AS-098]** demonstrates how the Applicant assessed the site against other potential alternative sites to ensure it was the most suitable, taking into account operational requirements, national and local planning policy and planning and environmental constraints, including the consideration of the loss of BMV agricultural land. The Design Approach Document **[APP-186]** then explains the design vision and principles that were developed at an early stage to provide a framework for design evolution. Design Principle 2 as detailed in Section 3.9 of the Design Approach Document **[APP-186]**, relates to being sensitive to existing

Ref. No.	IP Name	Theme	Scopwick and Kirkby Parish Council Written Submission / Summary of Written Submission	Applicants Response to Scopwick and Kirkby Parish Council Written Submission
				agricultural land and reducing development on BMV land. As set out in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**, the permanent loss of BMV land as a result of the Proposed Development relates to the permanent loss of 1.5ha of Grade 3a land to ecological enhancements, which is noted as likely to be beneficial to the soil resource, although it is acknowledged that the magnitude of impact relates to the withdrawal of land from agricultural production, and therefore is established as a minor adverse effect. It is also important to note that the loss of agricultural production on the land as a result of the Proposed Development would not be permanent. The Applicant is applying for a 60-year operational period for the Proposed Development. Under Requirement 20 of the Draft DCO **[REP1-007]**, decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational lifetime of the Proposed Development, the land will be available for its current use, although the landowners would choose how the land is to be used and managed. It should be noted that the Proposed Development has also been designed recognising the need to allow current farming practices to continue where possible. The Order Limits include a significant portion of retained arable land (a minimum of 181ha (447.3 acres) of retained arable land is secured via the Framework LEMP **[REP1-039]**, a detailed version of which is to be developed substantially in accordance with the Framework LEMP, as secured under Requirement 8 of the Draft DCO **[REP1-007]**), which provides mitigation for ground nesting birds whilst also allowing current farming practices to continue. This retained arable land includes approximately 116ha (286.6 acres) of Subgrade 3a BMV land. As detailed in the Statement of Need **[APP-184]**, the Applicant recognises that alternatives such as decentralised energy generation on roof tops or brownfield land have an important role to play in decarbonisation. However, on their own, smaller scale solar, including solar on brownfield land, are not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. The Government recognises in NPS EN-1 that growth in large-scale solar schemes, alongside smaller schemes of solar or other renewable energy sources, is expected to improve the dependability of those assets as a combined portfolio, contributing to the adequate and dependable energy generation mix required to meet the energy security and decarbonisation needs of the UK. Whilst brownfield solar and other smaller scale energy schemes are likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Proposed Development, in line with NPS EN-1. Paragraph 2.10.29 of NPS EN-3 states that while land type should not be a predominating factor in determining the suitability of a site location, preference should be given to using brownfield and non-agricultural land. As demonstrated in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**, these land types were identified within the area of search by reviewing the relevant brownfield land registers and drawing on local knowledge. No suitable areas of brownfield or non-agricultural land at the

Ref. No.	IP Name	Theme	Scopwick and Kirkby Parish Council Written Submission / Summary of Written Submission	Applicants Response to Scopwick and Kirkby Parish Council Written Submission
				appropriate scale were found within a viable search area of the point of connection at the proposed National Grid Substation near Navenby.
REP 1-063	Scopwick and Kirkby Parish Council	Benefit to UK Customers	The Parish Council is not convinced that the electricity generated would primarily benefit UK consumers. There are legitimate concerns that a significant proportion of the power could be exported via interconnectors, while local communities bear the environmental, landscape and amenity impacts. There is no clear evidence that the scheme would reduce household energy costs or deliver meaningful local or regional benefit commensurate with the scale of harm proposed.	It is noted that the Proposed Development itself will not directly lower local electricity prices as the energy generated by the Proposed Development will be distributed across the National Grid network where required – the Applicant does not have the power to dictate where National Grid distributes the electricity that will be generated and therefore cannot control whether it is used locally. From a network management point of view, where feasible, National Grid always aim to use electricity close to the source of generation to minimise system losses, but it may be distributed to other regions if there is a surplus of supply. However, it should be noted that the Applicant is committed to ensuring that the Proposed Development provides benefits beyond those of supporting the UK government's Net Zero ambitions, in order to deliver a positive impact for the local community. The Applicant is not in control of what is imported/exported to/from the UK, but the Statement of Need **[APP-184]** is clear and obvious that the UK requires substantial more solar energy to power its own energy demand.
REP 1-063	Scopwick and Kirkby Parish Council	Employment and Skills	Lincolnshire's economy relies heavily on agriculture and tourism. The scale and concentration of development risks long-term damage to employment, rural skills, training pathways and the distinctive character of the county.	A Framework Employment, Skills and Supply Chain Plan (ESSCP) **[APP-197]** was submitted as part of the DCO Application. The overarching aim of this Plan is to make provision for the Proposed Development to create opportunities for the improvement and employment of local skills and engage in the ethical procurement of the supply chain. The framework plan categorises potential opportunities by three main themes: • Theme 1 – Development of Skills • Theme 2 – Access to Employment • Theme 3 – Supporting the Supply Chain Amongst other things, the Applicant will consider the following in the development of the full ESSCP: • A programme to promote apprenticeships during the construction phase Interventions to support the training of employees and works on the Proposed Development; • Engagement with Local Authorities and Job Centre Plus; • Community and voluntary sector groups which specialise in local recruitment; • Awareness raising events to provide businesses with information on supply chain opportunities and the key capacity and capability requirements they would need to meet; and • Establishing relationships with relevant Chambers of Commerce and Federation for Small Businesses. Further information, including delivery and monitoring proposals, are set out in the Framework ESSCP **[APP-197]**. The Applicant has engaged with both NKDC and LCC in the development of the Framework ESSCP and will continue this engagement. A detailed ESSCP, which is to be substantially in accordance with the Framework ESSCP, is secured through Requirement 19 of Schedule 2 to the Draft DCO **[REP1-007]** and will be subject to approval by NKDC in consultation with LCC. As also concluded in Chapter 12: Socio-economics and Land Use of the ES **[AS-016]**, there are no adverse socio-

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				economic effects as a result of the Proposed Development that require mitigation to be provided. This includes in respect of employment, skills and the supply chain.
REP 1-063	Scopwick and Kirkby Parish Council	Landscape and Visual Impact	The application site lies within an open, rural landscape that is widely valued for its tranquillity and recreational use, including walking, cycling and horse riding. The Parish Council considers that the scale and extent of development would result in severe and irreversible landscape and visual harm.	The Applicant has committed to creating approximately 9.5km of new permissive paths to supplement the existing PRoW network, linking together existing walking routes and creating enhanced connections to surrounding villages. The Framework LEMP **[REP1-039]**, a detailed version of which is to be developed, substantially in accordance with the framework plan, as secured by Requirement 8 of the Draft DCO **[REP1-007]**, sets out the permissive path network will be implemented during operation of the Proposed Development providing routes across the Principal Site and enhancing the recreational value of the Order Limits. The proposed permissive path network has evolved following feedback at the statutory consultation stage, as explained in Chapter 4 Alternatives and Design Evolution of the ES **[APP-029]**, providing more effective linkages across the site. The Proposed Development will create new permissive paths available to the public during the operational lifetime. These permissive paths include: new connections around Cathedral Park; a new connection at Tunman Wood; a new connection at Thurlby; and a new circular route to the west of Bassingham. These permissive paths are secured in Requirement 17: Permissive paths and Requirement 8: Landscape and ecological management plan as set out in the Draft DCO **[REP1-007]** and in the Streets, Rights of Way and Access Plans **[AS-106]**. The Applicant has sought to minimise landscape and visual impacts of the Proposed Development in its pursuit of securing good design as set out in the Design Approach Document **[APP-186]**. The Applicant acknowledges that there would be some adverse effects on the visual amenity of surrounding villages resulting from the Proposed Development, as detailed within Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**, but considers that these would only be in the short to medium term during construction and the early years of operation. There are no significant long term visual effects anticipated on residents of local villages as, by year 15 of operation, the proposed landscaping would have matured such that views of solar PV infrastructure within the Principal Site would be screened. While the Proposed Development covers a large site area, its scale has been informed by a comprehensive, iterative design process that has sought to minimise landscape and visual effects, developed and refined in response to consultation feedback from statutory consultees, local stakeholders and persons with land interest, with such engagement helping to shape the layout and approach to land use to minimise environmental impacts. While the Proposed Development comprises infrastructure for solar energy generation and associated development (such as BESS), the land is not permanently changed to industrial use in land use planning terms, and it should be noted that the Proposed Development also includes a significant amount of retained arable land.
REP 1-063	Scopwick and Kirkby Parish Council	Photomontages	The submitted photomontages rely heavily on proposed hedgerow planting, without adequately acknowledging that such screening may take a decade or more to establish, if it succeeds at all. In addition, equivalent visualisations are not provided for Battery Energy Storage System (BESS) compounds, resulting in an incomplete and potentially misleading representation of the scheme's true visual impact.	The provision of visual screening for residents and users of PRoW has been considered throughout the design of the landscaping proposals, as illustrated in the Landscape Mitigation Plan presented in Figure 7.15-1 within the Framework LEMP **[REP1-039]**, whereby (as noted in paragraph 4.1.4) the overall goal of the landscape strategy is to integrate the Proposed

Ref. No.	IP Name	Theme	Scopwick and Kirkby Parish Council Written Submission / Summary of Written Submission	Applicants Response to Scopwick and Kirkby Parish Council Written Submission
				Development into its surrounding landscape and to avoid or minimise adverse landscape and visual effects as much as possible. New planting will be planted as part of the construction phase. In the unlikely event that screening planting fails, it will be replaced with like-for-like stock to ensure it performs as intended (and assessed). Refer to paragraphs 5.3.15 and 5.3.23(g) of the Framework LEMP **[REP1-039]**. As secured by the Framework LEMP **[REP1-039]**, maintenance measures will be specified and implemented as part of the detailed LEMP, including (ref. paragraph 7.1.7) a postconstruction monitoring programme (which will be formalised, agreed and included within the detailed LEMP) comprising walkover surveys of the Order Limits undertaken between April and June in years 2, 4, 6, 10 and then every 5 years post-construction until year 60. As noted in the Framework LEMP **[REP1-039]** (ref. paragraph 7.1.11) results from the postconstruction monitoring will feed into the management plan and, if required, management may be amended accordingly based on this monitoring; for example, replacement planting and/or changes to planting species where planting has failed to establish. The viewpoints and photomontages for the assessment were agreed with LCC and NKDC. The BESS is included in photomontages where it is visible, such as from Grange Cottage (see photomontage for Viewpoint 35 **[AS-119]**).
REP 1-063	Scopwick and Kirkby Parish Council	Biodiversity Protection and Enhancement	The Parish Council is concerned about potential impacts on wildlife, particularly migratory birds and species dependent on open countryside habitats. The combined effects of panel coverage, fencing, lighting, noise and habitat fragmentation raise serious doubts about whether biodiversity can be adequately protected or enhanced over the lifetime of the development.	The Applicant has responded to comments regarding the impact of the Proposed Development on Wildlife Habitats in detail within Table 7-3 (Page 255 and 256) of the Applicant's Response to Relevant Representations **[REP1-047]**. An assessment of the impact of the Proposed Development on birds is presented in Table 8-14 of Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]**, with Section 8.12 of Chapter 8 setting out specific mitigation requirements for ground nesting birds such as skylark and lapwing. With these measures in place Table 8-16 of Chapter 8 concludes that no significant effects on ground-nesting birds (or other birds) will arise as a result of the Proposed Development. Surveys for breeding and non-breeding birds (which inherently consider summer and winter migratory species) have been undertaken across the Order Limits, the full results of which are included in Appendix 8-G: Breeding Birds **[AS-086]** and Appendix 8-H: Non-breeding Birds of the ES **[AS-087]**. Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]** assesses the impacts of the Proposed Development on breeding and non-breeding birds including displacement, with appropriate bird mitigation land provided (64ha (158.1 acres) of permanent grassland and a minimum of 181ha (447.3 acres) of retained arable). These areas are indicatively illustrated as Arable fields A to F on Figure 8-5: Bird Mitigation Land Allocation of the ES **[AS-046]** but could be rotated within the areas of the Order Limits where there is no solar PV infrastructure, providing the principles for field sizes are achieved. The mitigation is secured in the Framework LEMP **[REP1-039]** and secured by Requirement 8 of the Draft DCO **[REP1-007]**.

Ref. No.	IP Name	Theme	Scopwick and Kirkby Parish Council Written Submission / Summary of Written Submission	Applicants Response to Scopwick and Kirkby Parish Council Written Submission
REP 1-063	Scopwick and Kirkby Parish Council	Operational Life-span	The application seeks consent for a period of up to 60 years. The Parish Council questions the justification for such a prolonged operational lifespan and has serious concerns regarding long-term accountability.	The 60-year lifetime is considered appropriate for the Proposed Development and aligns with some other consented solar projects, whereby the 60-year lifetime of the Proposed Development will provide urgently needed low-carbon renewable electricity and be a critical part of the national portfolio of renewable energy generation that is required to decarbonise its energy supply quickly and contribute to the transition to net zero. The Applicant has responded to comments relating to the justification for the duration of the Proposed Development in the following sections of the Applicant's Response to Relevant Representations **[REP1-047]:** • **Table 3-1 (Section 2)** on Page 94, in response to **RR-210** • **Table 7-11** on Page 308, in response to **RR-222** • **Table 7-13** on Page 327, in response to **RR-027, RR-095, RR-192, RR-228, RR-245, RR-273, RR-276**
REP 1-063	Scopwick and Kirkby Parish Council	Decommissioning	Comment that if land is to be restored following decommissioning, this must be secured through the Development Consent Order, with binding obligations to return the site to fully functional Best and Most Versatile agricultural land, free from contamination, and supported by robust and enforceable financial guarantees.	With regards to decommissioning and land restoration, at the end of the operational period the above ground infrastructure will be removed and the land returned to the landowner for future use, in accordance with the Framework DEMP **[REP1-035]**, secured through the Draft DCO **[REP1-007]**, which is legally binding, and will be approved by the relevant Local Planning Authority prior to the end of the operational period. The DCO process provides a legally enforceable mechanism requiring the Applicant to deliver decommissioning. The Applicant considers that the measures within the Draft DCO provide an appropriate and proportionate level of assurance that decommissioning and restoration will occur at the end of the project's life. This is in line with other consented solar NSIPs in Lincolnshire, including Tillbridge Solar Project and West Burton Solar Project.
REP 1-063	Scopwick and Kirkby Parish Council	Contamination from Solar Infrastructure	Concerns regarding the potential for environmental contamination arising from solar panels, cabling and BESS infrastructure, including PFAS and heavy metals. Well-documented BESS incidents demonstrate that failure risks are real and can result in fire, toxic emissions and environmental pollution. It is unacceptable that such risks are effectively transferred to local communities and emergency services without clear, long-term liability and responsibility arrangements.	The Phase 1 Preliminary Risk Assessment (ES Appendix 14-C) **[APP-170]** states in Chapter 14 Conclusions in paragraph 14.1.1 that "The potential risks that have been identified from potential contaminated land have been assessed by the PRA as being very low to moderate / low". It should be noted that the Framework CEMP **[REP1-031]** (ref. measure GC-C1), Framework OEMP **[REP1-033]** (ref. measure GC-O1), and Framework DEMP **[REP1-035]** (ref. measure GC-D1) all secure appropriate mitigation in the event that contamination is identified. The supplier and make of solar PV panels that will be used for the Proposed Development has not yet been chosen – this approach is common for developments of this kind, as solar PV technologies are constantly evolving, and new efficiencies are developed regularly. However, it can be confirmed that any PV cells to be used will be PFAS-free. To ensure this measure is secured, the Proposed Development Parameters **[REP1-029]** were updated at Deadline 1 in relation to Work No.1 (design) to note: "*The solar PV cells will be PFAS (per-and poly fluoroalkyl substances) free*". Requirement 6(2) in the Draft DCO **[REP1-007]** requires the detailed design of the Proposed Development to be in accordance with the Proposed Development Parameters.

Ref. No.	IP Name	Theme	Scopwick and Kirkby Parish Council Written Submission / Summary of Written Submission	Applicants Response to Scopwick and Kirkby Parish Council Written Submission
				Regarding potential harm caused by any potential BESS fire, a variety of assessments have been carried out to address potential areas of risk from the BESS as detailed in the ES **[APP025 - APP-179]**. The Proposed Development includes embedded design mitigation and protection measures to reduce fire/explosion risk, which are detailed in the Framework BSMP **[APP-198]**. These measures include an automatic cooling system which will be integrated into the BESS to stop or reduce battery cell thermal runaway propagation. The BESS is designed so that in the event one cell overheats/catches fire, there is sufficient distance between the cells to mitigate the risk of this spreading (to keep a fire isolated to a single cell (to the extent which it is possible to control this)). This layout has been developed in consultation with the LFRS and has taken account of guidance from the NFCC. Communication with the LFRS will continue through the detailed design and construction stages. The LFRS would be expected to let a BESS fire burn out, but the focus of the Framework BSMP **[REP1-031]** is to prevent a fire occurring. There have been very few utility scale BESS fires in the UK to date, all of which were built prior to the current NFCC safety guidance, meaning that the components / setup which caused these fires are no longer permitted for use, and therefore will not be used within the BESS of the Proposed Development. The Framework BSMP **[REP1-041]** is to be developed into a detailed BSMP, substantially in accordance with the Framework BSMP, as secured under Requirement 7 of Schedule 2 to the Draft DCO **[REP1-007]**.
REP 1-063	Scopwick and Kirkby Parish Council	Supply Chain	Concern regarding the potential use of solar panels and batteries manufactured within supply chains linked to forced labour. Full transparency regarding equipment sourcing must be required. No consent should be granted for equipment associated with modern slavery, and wherever possible materials should be sourced from verifiable, ethical suppliers, including UK-produced components.	The Applicant wishes to ensure the construction, operation and decommissioning of the Proposed Development being undertaken is pursuant to an ethical procurement policy and has made this a legal obligation under the Draft DCO **[REP1-007]**. This is via commitments made within the Framework Employment and Skills Supply Chain Plan (ESSCP). Under Requirement 19 of Schedule 2 of the Draft DCO, a detailed ESSCP, substantially in accordance with the Framework ESSCP, must be submitted to the relevant planning authority for approval. The ESSCP must be implemented as approved. The Applicant has responded to comments relating to the manufacture of solar infrastructure in further detail in the following sections of the **Applicant's Response to Relevant Representations [REP1-047]:** • **Table 7-19 on Page 375**

5.5 Thorpe on the Hill Parish Council [REP1-066]

Table 5-5: Applicant's Responses to Parish Councils – Thorpe on the Hill Parish Council

Ref. No.	IP Name	Theme	Thorpe on the Hill Parish Council Written Submission / Summary of Written Representation	Applicants Response to Thorpe on the Hill Parish Council Written Representation
REP1-066	Thorpe on the Hill Parish Council	Conflicts with Thorpe on the Hill Neighbourhood Plan	Comment that parish priorities of the Thorpe on the Hill Neighbourhood Plan (NP) are conflicted (see page 31 of NP) relating to: • Community wellbeing, leisure and recreation • The local economy and promotion of tourism	Appendix B: National Policy Accordance Tables and Appendix C: Local Policy Accordance Tables of the Planning Statement **[AS-098]** set out in detail how the Proposed Development complies with the specific policies of the energy NPSs (NPS) and other national and local planning policies. With regards to planning policy, Section 6 of the Planning Statement **[AS-098]** sets out the appraisal of the Proposed Development against the relevant Energy NPSs. Within this appraisal, reference has also been made to the NPPF and local planning policies which the Applicant considers may be considered important and relevant to the Secretary of State's determination of the DCO Application. The Thorpe on the Hill Neighbourhood Plan is considered in Appendix C: Local Policy Accordance Tables of the Planning Statement **[AS-098]**. The Applicant acknowledges that, regardless of the Proposed Development being of Critical National Priority, it is necessary to consider the planning balancing to weigh potential adverse impacts against overall benefits. The planning balance is considered in Section 7.3 of the Planning Statement **[AS-098]**. In summary, it is concluded that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean that the DCO should not be granted consent. The potential impacts identified are clearly outweighed by the substantial public benefits that would arise from the provision of low-carbon energy to meet the need identified in the energy NPSs. As a result, the Proposed Development is in accordance with the relevant Energy NPS, national planning policy and the relevant development plan documents, such as the Central Lincolnshire Local Plan (2023), when considered as a whole.
REP1-066	Thorpe on the Hill Parish Council	Photomontages	Comment that 'Map 5: Landscape Character and Features' of the Thorpe on the Hill Neighbourhood Plan[2] (Page 25) should have been used by the Applicant for their photomontages rather than the ones artificially chosen to portray a less damaging impact. Concern that views to and from Thorpe on the Hill's elevated position are typically absent in the Application.	The viewpoints for assessment and production of photomontages were chosen in consultation with LCC and NKDC as representative of the views of the Site from the local surrounds.
REP1-066	Thorpe on the Hill Parish Council,	Views from Thorpe on the Hill	Concerns regarding views from the village's elevated position will be dramatically and adversely impacted. Even if screening is introduced, this will damage the open aspects of the recreational amenity. Reference is given to the Thorpe on the Hill Neighbourhood Plan which heavily emphasised the Landscape Character and Key Views. Comment that these appear to have been inadequately addressed in the proposed development.	Changes to the design have been made in the vicinity of Thorpe on the Hill in response to feedback received from Thorpe on the Hill Parish Council and local residents during statutory consultation to reduce the impact of the Proposed Development, as set out in Table 4-2 of Chapter 4: Alternatives and Design Evolution of the ES **[APP-029]**. This has included the removal of solar PV within the field south-east of Thorpe on the Hill, which is now an area of managed arable fields for bird mitigation habitat purposes (i.e. no solar infrastructure proposed), to increase the distance from the village to the Proposed Development itself, and providing additional vegetation screening along Fosse Lane. As such, the Proposed Development design provides a 300m buffer between the proposed solar infrastructure and residential receptors in Thorpe on the Hill, which is secured via the Works Plans **[AS-105]**, in that under Requirement 6 of the Draft DCO **[REP1-007]**, the detailed design of the Proposed Development must be in accordance with the Works Plans. See Figure 3-2A of the ES **[AS-022]** and the Framework LEMP **[REP1-039]** for details.

[2] Thorpe on the Hill Neighbourhood Plan (2018) Available at: https://www.n-kesteven.gov.uk/sites/default/files/2023-01/neighbourhood_plan_thorpe_on_the_hill.pdf

Ref. No.	IP Name	Theme	Thorpe on the Hill Parish Council Written Submission / Summary of Written Representation	Applicants Response to Thorpe on the Hill Parish Council Written Representation
				The Design Approach Document **[APP-186]** provides further details of all the design changes made in response to responses made to non-statutory and statutory consultation, the outcomes of environmental assessment and national and local planning policy. Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** concludes that the Proposed Development will have a moderate adverse (significant) impact during construction (in winter), reducing to a minor adverse (not significant) impact by Year 1 of operation (in winter), a minor adverse (not significant) impact by Year 15 of operation (in winter) and a negligible adverse (not significant) impact by Year 15 of operation (in summer) on the residents of Thorpe on the Hill. With regards to planning policy, Section 6 of the Planning Statement **[AS-098]** sets out the appraisal of the Proposed Development against the relevant Energy NPSs. Within this appraisal, reference has been also made to the NPPF and local planning policies which the Applicant considers may be considered important and relevant to the Secretary of State's determination of the DCO Application. The Applicant acknowledges that, regardless of the Proposed Development being of Critical National Priority, it is necessary to consider the planning balancing to weigh potential adverse impacts against overall benefits. The planning balance is considered in Section 7.3 of the Planning Statement **[AS-098]**.
REP1-066	Thorpe on the Hill Parish Council	Site Selection Process	Reference is given to National Policy Statement EN-1 and EN-3 - Paragraph 2.10.21 states that applicants should, where possible, utilise previously developed, brownfield, contaminated or industrial land, and avoid the use of Best and Most Versatile agricultural land. • Paragraph 2.10.23 requires applicants to explain their choice of site, noting this preference. Comment that the applicant has provided insufficient evidence of a rigorous assessment of reasonable alternatives, particularly those involving brownfield or industrial land with existing or close grid connection capability even if this meant widening the radius of study. Concern that the overall site layout strongly suggests that selection has been driven primarily by the availability of willing landowners. This has resulted in a highly inefficient and damaging configuration, with solar arrays located up to 10 kilometres from the proposed grid connection at Navenby. It has also led to a major concentration within the Parish Boundary of Thorpe on the Hill.	The Applicant has responded in detail to comments relating to Site Selection, including regarding justification for the Site Selection, consideration of alternatives and consideration of National Policy within **Table 7-12** of the **Applicant's Response to Relevant Representations [REP1-047]** on Page 320 - 334.
REP1-066	Thorpe on the Hill Parish Council	Lack of available grid connection	Scopwick - The Government's Clean Power 2030 initiative reinforces the importance of brownfield-led development and conflicts directly with the approach taken in this application. Furthermore, there is no confirmed grid connection. The Parish Council considers it inappropriate to grant consent for a Nationally Significant Infrastructure Project that is dependent upon a separate and currently unconsented substation proposal.	The Applicant has responded in detail to comments relating to Site Selection, including regarding concerns relating to a lack of available grid connection within **Table 7-12** of the **Applicant's Response to Relevant Representations [REP1-047]** on Page 322 - 323. In terms of the consideration of brownfield sites, refer to the Written Summaries of Oral Submissions Issue Specific Hearing 1 **[REP1-046]** which set out the brownfield sites considered as part of the site selection process as described in Appendix A Site Selection Report of the Planning Statement **[AS-098]**.
REP1-066	Thorpe on the Hill	Access from A46	The applicant was incorrect in his claim, repeated at the recent public hearings, that this proposal relied on an upgraded access from the A46, as [redacted] latest submission makes clear.	The Applicant has responded to the comments raised in **REP1-135** regarding an alternative Proposed Development in detail within **Table 6.1**.

Ref. No.	IP Name	Theme	Thorpe on the Hill Parish Council Written Submission / Summary of Written Representation	Applicants Response to Thorpe on the Hill Parish Council Written Representation
	Parish Council			
REP1-066	Thorpe on the Hill Parish Council	Road Safety	Comment that Thorpe on the Hill has become a 'rat-run', by providing a convenient means of avoiding the congested Lincoln bypass (A46), particularly at peak times, during holiday periods, and when accidents occur on the bypass Local overloads described above are a common occurrence and in such circumstances the village can grind to a complete standstill. Daily traffic flows of 3000 – 4000 per day can easily be increased by 50% as a result of such incidents and are concentrated during rush hour peaks. We strongly suggest that the Inspection process includes a visit to the village during the evening rush hour period.	Mitigation and traffic management measures to ensure safe driving will be implemented as set out within the Framework CTMP **[AS-102]** a detailed version of which is to be prepared, substantially in accordance with the framework plan, as secured under Requirement 14 of the Draft DCO **[REP1-007]**. This includes usage of committed HGV routes, see Figure 13-4 HGV Routing **[AS-072]**, none of which will pass through Thorpe on the Hill and measures to limit when vehicles can travel to and from the Site (both in terms of HGVs and construction worker traffic (the latter due to the Proposed Development working hours) in order to avoid peak traffic times, such as the evening peak. A monitoring system would be put in place along the route of all HGVs travelling to and from the Site which would record any noncompliance and to communicate any issues with the relevant contractors/suppliers. The Framework CTMP **[AS-102]** also provides details of enforcement measures should there be any instances of non-compliance. When considering the mitigation secured through the Framework CTMP **[AS-102]**, Chapter 13: Traffic and Transport of the ES **[APP-038]** establishes a negligible effect (not significant) upon A46 receptors associated with Pedestrian Delay, Fear and Intimidation, and Non-Motorised User Amenity, a negligible to minor effect (not significant) upon A46 receptors associated with Driver Delay, Road Safety and Large Loads during the construction and decommissioning of the Proposed Development. During the operational period, effects upon the A46 will be negligible, as set out in paragraph 13.7.66 of Chapter 13: Traffic and Transport of the ES **[APP-038]**.
REP1-066	Thorpe on the Hill Parish Council	Road Safety	The parish is subject to a 7.5-tonne weight restriction, but enforcement is inadequate and excessive HGV traffic is already a persistent problem. Paragraph 2.10.27 of NPS EN-3 requires applicants to consider the suitability of access routes, particularly during construction. There is a deep concern that the construction traffic will exacerbate overloads particularly during peak periods. We note that applicant refers to Traffic Management and Monitoring during the construction phase but are concerned that this may be diluted. The Parish Council would like to know how this provisional intention can form a binding commitment. The Parish Council would also like to consulted on the proposed traffic monitoring and enforcement measures.	An assessment of the potential effects relating to additional construction traffic is carried out within Chapter 13: Traffic and Transport of the ES **[APP-038]**, in accordance with the legislation and planning policy outlined in Appendix 13-A: Traffic and Transport Policy and Legislation **[APP-163]**. This assessment concludes that the Proposed Development is not expected to result in any significant effects with the proposed embedded mitigation in place contained within the Framework CTMP **[REP1-043]**. The assessment has used the shortest expected construction programme (24 months), which provides a worst-case scenario in terms of construction vehicle trips as this is based on a rapid, and so shorter, construction period that would generate the highest number of peak hour and daily road trips on the local network. LCC and National Highways in their respective capacities as local highway authority and highway authority for the strategic road network, have deemed the impacts on the road networks to be acceptable in principle **[RR-157]** and **[RR-201]**. The Framework CTMP **[AS-102]** sets out the measures, and where necessary enforcement, to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network, in order to limit potential disruptions and implications on the wider transport network. The production of a detailed CTMP (which will be substantially in accordance with the framework) for approval by LCC is secured under Requirement 14 of the Draft DCO **[REP1-007]**. This Requirement also provides that construction of the Proposed Development must then be carried out in accordance with the approved CTMP. The only section of road with a 7.5 tonne weight restriction which is proposed for use by construction traffic associated with the Proposed Development, is Fosse Lane north of the junction with the A46 (heading towards Thorpe on the Hill).

Ref. No.	IP Name	Theme	Thorpe on the Hill Parish Council Written Submission / Summary of Written Representation	Applicants Response to Thorpe on the Hill Parish Council Written Representation
				However, construction vehicles will only utilise a short distance of this road before accessing construction access C-002 (see Figure 3-1 Construction Compound and Access Locations of the ES **[AS-021]**), some distance south of the village.
REP1-066	Thorpe on the Hill Parish Council	PRoWs	Concern that **[APP-045]** is almost illegible in terms of footpath identification references.	APP-045 has been superseded by AS-020. The Applicant does not see an issue with identifying the footpath labelling and considers the figure adequate.
REP1-066	Thorpe on the Hill Parish Council,	Recreational walking Routes	Comment that Thorpe on the Hill is exceptionally well served by recreational walking routes. The bulk of Whisby Nature Park is located in the village which attracts a wide range of visitors (approx. 250,000 p.a. based upon published data) some of whom extend their visits with walks around the village. Locations in the village are specifically referred to within the Witham Valley Country Park which covers around 40 square miles: “Connecting and promoting a variety of distinct and individual public green spaces in the heart of Lincolnshire”. One of NKDCs promoted “Stepping Out” walks is illustrated at the end of Section 2.5 of **[REP1-1-061]**. This route is widely used by walkers, runners and dog-walkers, and as mentioned, attracts visitors from outside the village. Free parking is available at the village hall, making the route particularly accessible. It is promoted both by NKDC through a dedicated leaflet and via the Parish Council website. Paragraphs 2.10.35 and 2.10.36 of NPS EN-3 encourage applicants to minimise visual impacts on public rights of way and to maximise opportunities for enhancement. While construction disruption will be significant, the operational impact is permanent. The character of this walk would be fundamentally and irreversibly altered. With the exception of the section through Tunman Wood itself, the route would pass through or alongside extensive solar arrays and associated infrastructure. The recreational value, visual appeal, and contribution to community wellbeing, of this route would effectively be destroyed; it would no longer function as a “Stepping Out” walk and would need to be removed in its current form. In addition, the claims of the Witham Valley Country Park would be completed undermined by the proposed industrial solar development.	With respect to the Stepping Out route highlighted in the comment, the Thorpe on the Hill & Tunman Wood route is a 3mile (4.5 km) circular walk starting from the village of Thorpe on the Hill. The walk intersects with several PRoW within the Thorpe on the Hill parish PRoW network, which includes multiple designated footpaths and bridleways. The following PRoW are understood to be used along the route: LL|TOTH|7/3, LL|TOTH|7/2#2 and LL|TOTH|7/2#1.-mile (4.5 km) circular walk starting from the village of Thorpe on the Hill. The walk intersects with several The Applicant does not consider that the Council has identified any policy foundation, policy recognition, special status or policy protection of “Stepping Out Walks” in the context of the wider consideration of the impacts of the Proposed Development on designated Public Rights of Way in terms of landscape and visual effects, socio-economic effects and others considered as part of the Environmental Impact Assessment prepared for the Application, and the provision of new Permissive Paths. Indeed, even within the lengthy policy analysis provided by the Council in its Written Representation, the only reference to stepping out walks that the Applicant can identify is in Priority Outcome 1 of the North Kesteven Active Travel Strategy 2025 – 2030, to "*Investigate the potential for further development of ‘stepping out’ style routes and information for walking and wheeling."* The Active Travel Strategy's goal is to increase participation in active travel by enhancing infrastructure, promoting safety, and raising awareness of health and environmental benefits, supporting overall council wellbeing and climate priorities. It does not provide any particular policy status or protection for 'Stepping Out Walks'. Accordingly, the Applicant submits that it has addressed and achieved the goals identified in the Active Travel Strategy in relation to formally designated Public Rights of Way and Permissive Paths, as well as providing new Permissive Paths with the design of the Proposed Development. As a consequence, in the absence of any clear policy support for the Council’s position, the Applicant does not consider that, where a PRoWs can be identified as forming part of a Stepping Out Walk”, such a PRoW has any enhanced policy status or protection. The Applicant considers that any impacts upon such PRoWs are to be assessed in the same manner and given the same weight as any other PRoW, whether a Stepping Out Walk or not It is also important to note that the Stepping Out Walks that interact the Proposed Development require use of private land that is not a PROW or permissive path to

Ref. No.	IP Name	Theme	Thorpe on the Hill Parish Council Written Submission / Summary of Written Representation	Applicants Response to Thorpe on the Hill Parish Council Written Representation

complete these walks, and therefore they cannot be walked in their entirety currently].

Potential impacts on PRoWs, including those that coincide with promoted walking routes, are assessed in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**. The assessment treats PRoWs as part of the local recreational resource and assesses both temporary and permanent impacts arising from construction, operation and decommissioning. Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** identifies the baseline PRoW network, confirming the presence of 36 PRoWs and seven permissive paths within the Principal Site, as well as 26 PRoWs running either adjacent to or in close proximity to the Order Limits (paragraphs 12.5.30–12.5.32). A further five PRoWs may be affected by the Cable Corridor (paragraph 12.5.33). While the ES Chapter does not identify whether individual PRoWs form part of the Stepping Out Network, the assessment explicitly covers all PRoWs within 500m of the DCO Site (paragraph 12.4.6), which would include any promoted routes present within that area.

The assessment in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** considers the permanent diversion of three PRoWs: LL_Aubo_10/1, LL_THUN_2/1, and LL_TOTH_13/1 (paragraphs 12.7.31–12.7.33). Each diversion is described in terms of its existing length, the change to user journey length, and the availability of alternative routes within the wider PRoW network. For all three routes, sensitivity and magnitude of impact are assessed as low, resulting in negligible and not significant effects.

Temporary closures may be required during the construction phase; however, Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** notes that the wider PRoW network offers suitable substitute routes and therefore assesses temporary impacts as very low adverse, leading to a negligible (not significant) effect (paragraph 12.7.34). The ES confirms that all PRoWs would be reinstated following completion of relevant works.

The assessment within Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** refers to the Framework PRoWMP **[APP-195]** and sets out the approach to managing PRoW during all phases (paragraphs 12.6.5(d) and 12.7.35). This includes measures relating to signage, diversions, maintaining safe access and minimising disruption to users.

During operation, the ES notes that the three permanent diversions would remain in place and continue to result in negligible, not significant effects (paragraph 12.7.57). No additional operational impacts on other PRoWs are identified (paragraph 12.7.58). The Proposed Development would also create approximately 9.5 km of new permissive paths, which are assessed as providing a low beneficial (minor, not significant) effect by enhancing local connectivity (paragraph 12.7.59).

Overall, the assessment in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** concludes that the scale of changes to journey length, travel

Ref. No.	IP Name	Theme	Thorpe on the Hill Parish Council Written Submission / Summary of Written Representation	Applicants Response to Thorpe on the Hill Parish Council Written Representation
				patterns and access opportunities is limited, and that effects on PRoW users, whether local residents or visitors, would be negligible and therefore not significant across construction, operation, and decommissioning. From a landscaping perspective, of relevance to the PRoW used along Stepping Out routes, Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** concludes moderate adverse effects in Year 15 for Recreational users of PRoWs TOTH/7/2 and TOTH/11/1 during winter when there are no leaves on the vegetation.

5.6 Swinderby Parish Council [REP1-067]

Table 5-6: Applicant's Responses to Parish Councils – Swinderby Parish Council

Ref. No.	IP Name	Theme	Swinderby Parish Council Written Submission / Summary of Written Submission	Applicants Response to Swinderby Parish Council Written Submission
REP1-067	Swinderby Parish Council,	Scale of Development in a Rural Area	Concern regarding the scale of the Proposed Development and others delivered or in the pipeline, and the impact upon the rural environment and transformation of the rural landscape.	With regards to the scale of the Proposed Development, as set out in Section 3.4 of Appendix A: Site Selection Report of the Planning Statement **[AS-098]** a site of approximately 1,000 hectares (the equivalent to 2,471 acres) was deemed to be required, taking into account the necessary solar infrastructure to support the 240MW grid connection offer, the need for land to provide environmental mitigation and in order to retain flexibility. As detailed in the Statement of Need **[APP-184]** smaller scale solar, are not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. The Government recognises in the overarching NPS for Energy (NPS EN-1) that growth in large-scale solar schemes, alongside smaller schemes of solar or other renewable energy sources, is expected to improve the dependability of those assets as a combined portfolio, contributing to an adequate and dependable UK generation mix required to meet the UK's energy security needs, and the decarbonisation needs of the UK. Whilst smaller scale energy schemes are likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Proposed Development, in line with NPS EN-1. It should be noted that the Proposed Development does not only comprise infrastructure – for example, alongside ecological enhancement measures and habitat provision, the Order Limits also include a significant portion of retained arable land (a minimum of 181ha (447.3 acres) of retained arable land is secured via the Framework LEMP **[REP1-039]**, a detailed version of which is to be developed substantially in accordance with the Framework LEMP, as secured under Requirement 8 of the Draft DCO **[REP1-007]**). The Applicant has sought to minimise landscape and visual impacts of the Proposed Development in its pursuit of securing good design as set out in the Design Approach Document **[APP-186]**. The Applicant acknowledges that there would be some adverse landscape and visual effects resulting from the Proposed Development, as detailed within ES Chapter 10: Landscape and Visual Amenity **[AS-117]**, but considers that some impact is inevitable. This is also reflected in the Overarching NPS for Energy (EN-1), paragraph 5.10.5 which states that "virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation." The Applicant considers that significant landscape and visual effects would predominantly be in the short to medium term during construction and the early years of operation. With regards to the 'transformation of the rural landscape', it is important to note that the Proposed Development would be temporary. The Applicant is seeking consent for a 60-year operational period. Under Requirement 20 of the Draft Development Consent Order **[REP1-007]**, decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational life, the land will be returned to the landowners and available for its existing use. Although it would be the decision of the landowners whether to return the land to its existing use, any material change of use would require planning permission.

Ref. No.	IP Name	Theme	Swinderby Parish Council Written Submission / Summary of Written Submission	Applicants Response to Swinderby Parish Council Written Submission
REP1-067	Swinderby Parish Council,	Food Security	Concern regarding the amount of land identified or agreed for solar parks in Lincolnshire and Nottinghamshire and the impact upon food security.	The Applicant has responded in detail to comments regarding the Cumulative Effect of NSIPs in Lincolnshire within **Table 7-10** of the **Applicant's Response to Relevant Representations [REP1-047]** (Page 294 – 298).
REP1-067	Swinderby Parish Council	Solar on rooftops	Comment that residents do not object to solar panels on houses, warehouses and businesses and suggest these are used first.	As set out in the Statement of Need **[APP-184]** and supported by the Government's overarching NPS for Energy (NPS EN-1) and NPS for renewable energy infrastructure (NPS EN-3), while smaller-scale solar on rooftops or brownfield land contributes to decarbonisation, it is unlikely to deliver the scale of generation needed at the required pace and cost. Large-scale solar is an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Proposed Development, in line with NPS EN-1. Reasonable alternatives were considered during the site selection process (see the Appendix A: Site Selection Report of the Planning Statement **[AS-098]**), including brownfield and non-agricultural land. No suitable sites of the required scale were identified within a viable distance of the proposed grid connection near Navenby.
REP1-067	Swinderby Parish Council	Lack of robust model on energy generation	Concern regarding the lack of a robust scientifically based model on energy generation in the UK, particularly the different methods available and the quantity of electricity they can produce. The lack of a robust model on carbon capture both directly and indirectly from the atmosphere.	The decarbonisation of all sectors is essential in achieving the UK's legally binding target to achieve net zero by 2050, as per the Climate Change Act 2008 (as amended). Increasing solar generation plays a key part in this – as stated in Chapter 4: Alternatives and Design Evolution of the ES **[APP-029]**, paragraph 3.3.20 of NPS EN-1 recognises that solar (alongside wind) is the lowest cost way of generating electricity, and that analysis shows that "a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar". NPS EN-3 sets out specific policy for solar development, recognising solar as a Critical National Priority (CNP). Paragraph 2.10.9 of NPS EN-3 states that "The government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions by 2050. As such, solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector." Paragraph 2.10.10 of NPS EN-3 goes on to confirm that solar has an important role in delivering the government's goals for greater energy independence including those of the British Energy Security Strategy which sets out that the government expects a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW). The Statement of Need **[APP-184]** concludes that new solar developments such as the Proposed Development are needed to decarbonise the UK's electricity supply, provide additional low-carbon energy generation capacity in line with the expected growth in demand, and reduce national dependency on imported hydrocarbon source fuels. Chapter 4: Alternatives and Design Evolution of the ES **[APP-029]** also describes the consideration of alternatives and the design evolution of the Proposed Development, including how drawbacks and constraints associated with the Proposed Development (such as adverse effects) have been sought to be reduced or removed via embedded mitigation where possible. Other generation schemes, such as wind power, nuclear, coal, tidal, or gas fired power stations, have not been assessed due to their unsuitability at the Order Limits (in the case of a large-scale wind project and nuclear energy) or their inability to contribute to the UK's need for low-carbon electricity (in the case of coal or gas). With regards

Ref. No.	IP Name	Theme	Swinderby Parish Council Written Submission / Summary of Written Submission	Applicants Response to Swinderby Parish Council Written Submission
				to efficacy, solar produces similar amounts of energy per ha per year as onshore wind. Any future energy system must be resilient and affordable, and solar PV has been identified as being vital for a decarbonised grid and can support security of supply as part of a portfolio of different generation technologies, including wind and nuclear. Large-scale solar is an essential part of the future electricity system which must be deployed where there is the natural resource, where suitable land is available, and in proximity to available grid connection locations, such as the area local to the Proposed Development, in line with the overarching NPS EN-1. The Proposed Development represents a significant opportunity in this respect and would provide a significant contribution to the delivery of the UK Government's commitment to achieve net zero emissions by 2050 as per the Climate Change Act 2008 (as amended).
REP1-067	Swinderby Parish Council	Net carbon cost	Comment regarding the net carbon cost of manufacturing, transporting and decommissioning the solar parks.	As per Section 6.4.67 to 6.4.73 of Chapter 6 Climate Change **[REP1-017]** over the 60-year lifetime of the Proposed Development, the lifetime operational carbon intensity is a value of 25 gCO2e/kWh, which is overwhelmingly due to emissions from replacement components rather than the operation of the Proposed Development. The operational intensity of the Proposed Development is 88% lower than that of the grid average which sits at 207 gCO2e/kWh in 2025. Each kilowatt hour of electricity generated by the Proposed Development will emit 182 gCO2e less than if it was generated by the national grid. Combining this figure with the estimated lifetime output from the Proposed Development indicates an overall lifetime carbon saving, relative to the counterfactual grid average of the current (2025) energy mix, of 3,302,906 tCO2e. The carbon payback period for construction emissions is approximately 4 years of operation. Considering that the initial role of solar and other renewable energy generation is to displace fossil fuels such as gas from the grid, a payback period can be calculated when considering displacement of unabated Combined Cycle Gas Turbine (CCGT). This would be two years for the emissions in the construction phase of the Proposed Development. This will help the UK meet its national and international binding targets including the UK's Carbon Budget and the Nationally Determined Contributions in line with the Paris Agreement. As set out in paragraph 6.4.62 of Chapter 6 Climate Chage of the ES **[REP1-017]**, GHG emissions from the decommissioning phase are subject to a high degree of uncertainty, as the conditions that will apply in 2095 cannot be described with any confidence. For the purposes of the assessment, it is assumed that decommissioning emissions from the use of plant, worker travel and waste replicate the emissions produced during the construction phase. This is likely to be a conservative estimate as the emissions associated with these activities are anticipated to decrease in the future. Paragraph 6.4.63 sets out that emissions from the disposal and recovery of materials and components at the end of the Proposed Development's design life have been estimated based on a worst-case scenario that all materials and components will go to waste – 70% to recycling and 30% to landfill. This calculation is also likely to be a conservative estimate as it is anticipated that recycling rates will increase by the time of decommissioning. Emissions from the end-of-life disposal of all material and products is estimated at 282 tCO2e.

Ref. No.	IP Name	Theme	Swinderby Parish Council Written Submission / Summary of Written Submission	Applicants Response to Swinderby Parish Council Written Submission
REP1-067	Swinderby Parish Council	BESS Safety	Concern with regard to health and safety issues with the associated battery storage required in terms fire risks, impact upon flood plains and water quality.	The Applicant has responded in detail to comments regarding concerns relating to battery safety within **Table 7-14** of the **Applicant's Response to Relevant Representations [REP1-047]** (Page 337).
REP1-067	Swinderby Parish Council	Biodiversity	Impact upon biodiversity and the potential urbanisation of another rural area.	The Applicant has responded in detail to comments relating to impacts on biodiversity within **Table 7-3** of the **Applicant's Response to Relevant Representations [REP1-047]** (Page 255-259).

5.7 Wellingore Parish Council [REP1-068]

Table 5-7: Applicant's Responses to Parish Councils – Wellingore Parish Council

Ref. No.	Theme	Wellingore Parish Council Written Submission / Summary of Written Submission	Applicants Response to Wellingore Parish Council Written Submission
REP1-068	Scale and Industrialisation of the Countryside	The proposal covers approximately 2,600 acres of solar infrastructure, plus 867 acres for cabling installation, with over 1,300 lithium battery containers positioned within the wider site. This creates an industrial-scale development wholly inappropriate for a rural landscape. The setting of the cliff villages, including Wellingore, is defined by open, historic, agricultural countryside. The applicant's own line-of-sight mapping indicates that the visual setting of the cliff edge will be heavily affected, fundamentally altering the character of the area for at least 60 years. Replacing open countryside with large scale solar fields will permanently erode the rural context in which these historic villages sit. Wellingore Parish Council considers this level of landscape change completely unacceptable.	With regards to the scale of the Proposed Development, as detailed in the Statement of Need **[APP-184]** smaller scale solar schemes, are not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets for renewable energy generation and achieving net zero. The Applicant has sought to minimise landscape and visual impacts of the Proposed Development in its pursuit of securing good design as set out in the Design Approach Document **[APP-186]**. The Applicant acknowledges that there would be some adverse effects on the visual amenity of surrounding villages resulting from the Proposed Development, as detailed within Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**, but considers that these would only be in the short to medium term during construction and the early years of operation. There are no significant long term visual effects anticipated on residents of local villages as, by year 15 of operation, the proposed landscaping would have matured such that views of solar PV infrastructure within the Principal Site would be screened. While the Proposed Development covers a large site area, its scale has been informed by a comprehensive, iterative design process that has sought to minimise landscape and visual effects, developed and refined in response to consultation feedback from statutory consultees, local stakeholders and persons with land interest, with such engagement helping to shape the layout and approach to land use to minimise environmental impacts. Each village retains separation from the Principal Site by intervening farmland, existing landscape features and new mitigation planting. While the Proposed Development comprises infrastructure for solar energy generation and associated development (such as BESS), the land is not permanently changed to industrial use in land use in planning terms, and it should be noted that the Proposed Development also includes a significant amount of retained arable land.
REP1-068	Visual Impact on Wellingore and Surrounding Villages	Wellingore's elevated position on the Lincoln Edge means the village looks out across the very landscape identified for solar development. The transformation from open farmland to "solarland"—as identified by local representatives—would have a profound negative effect on: • heritage views • residential amenity	Residents of the Lincoln Cliff villages of Coleby, Boothby Graffoe, and Navenby are considered in the Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The assessment of visual effects concludes that there will be no significant operational visual effects on the residents of the assessed Lincoln Cliff villages. Table 10-12 of Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** provides the following summary:

Ref. No.	Theme	Wellingore Parish Council Written Submission / Summary of Written Submission	Applicants Response to Wellingore Parish Council Written Submission
		• the conservation setting of cliff villages • the tourism and recreational value of the landscape The proposed 1km "study area" adopted by the applicant does not accurately reflect the real extent of visibility, given the prominence of the cliff and the open vistas that define the villages' character.	"*Views across the Cable Corridor will remain unchanged in comparison to the existing views. The cable will be buried underground and will not affect the views to the north and east. Changes in views across the Principal Site will be barely perceptible due to the distance and intervening vegetation. There will be change in colour resulting from the distribution of the PV arrays across the fields. The onsite substation is going to be screened by the scattered woodland across Malborough Fen and Aubourn Fen*." Chapter 12 Socio-economics and Land use of the ES **[AS-016]** includes an assessment of potential effects on tourism/recreational amenity and residential amenity arising from the Proposed Development. Section 12.5 identifies the size of the visitor economy and recognises that the villages of Coleby, Bassingham, Navenby and Aubourn contain visitor and recreational attractions, and that there is also a network of PRoWs in the surrounding area which may be used by visitors. With due consideration given to other assessment findings set out in ES Chapter 10: Landscape and Visual Amenity **[AS-117]**, ES Chapter 11: Noise and Vibration **[APP036]**, ES Chapter 13: Traffic and Transport **[APP-038]** and ES Chapter 14: Other Environmental Topics (Section 14.2: Air Quality) **[APP-039]** as appropriate, the assessment in Section 12.7 of Chapter 12 Socio-economics and Land use of the ES **[AS-016]** concludes that overall the impact of the Proposed Development on tourism/recreation receptors and residential receptors is not significant during the construction/ decommissioning and operational phases. As set out in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**, the LVIA Study Area comprises a 2km radius from the DCO Site Boundary. In order to conclude that the 2km Study Area was a proportionate and representative geographic area, an initial area of search of 5km from the DCO Site Boundary was first investigated via desk-based reviews, a Zone of Theoretical Visibility (ZTV) and fieldwork.
REP1-068	Construction and Decommissioning Impacts	The project proposes: • 2.5 years of construction • 2 years of decommissioning • regular replacement cycles for panels, cabling, and battery infrastructure During these prolonged phases, Wellingore and neighbouring villages will experience: • significant HGV traffic • noise and dust • disruption on rural roads not designed for large engineering works • potential road safety risks for residents, schools, and pedestrians This level of disruption is disproportionate and would negatively affect community wellbeing for many years.	Chapter 3: The Proposed Development of the ES **[REP1-015]** provides an overview of the construction, operation, and decommissioning phases. Table 3-11 of this chapter presents the indicative design life of key equipment, which ranges from 10 years to 40 years. The replacement of this equipment will therefore be staggered, as and when needed, except for any site wide repowering which may occur during operation. The latter will be less intensive than impacts during construction and are not predicted to cause likely significant effects. The Applicant has responded in detail to comments regarding concerns relating to Traffic and Transport within **Table 7-7** of the **Applicant's Response to Relevant Representations [REP1-047]** (Page 278). The Applicant has responded in detail to comments regarding concerns relating to noise within **Table 7-7.5** of the **Applicant's Response to Relevant Representations [REP1-047]** (Page 265). The Applicant has responded in detail to comments regarding concerns relating road safety within **Table 7-7** of the **Applicant's Response to Relevant Representations [REP1-047]** (Page 279).

Ref. No.	Theme	Wellingore Parish Council Written Submission / Summary of Written Submission	Applicants Response to Wellingore Parish Council Written Submission
REP1-068	Battery Safety and Proximity	The application includes more than 1,300 lithium battery shipping containers. Lithium battery installations of this scale present well-documented fire and explosion risks, and require major emergency planning resources. Wellingore Parish Council has previously been involved in assessing similar risks for other proposed storage sites in the area, and remains deeply concerned that insufficient consideration has been given to: • fire mitigation • rural emergency service response capacity • water contamination risks • long term management of hazardous technology The location of such significant hazardous infrastructure within a rural setting is inappropriate and potentially dangerous.	The Applicant has responded in detail to comments regarding concerns relating to battery safety within **Table 7-14** of the **Applicant's Response to Relevant Representations [REP1-047]** (Page 337).
REP1-068	Lack of Demonstrable Need	According to the Government's National Energy System Operator (NESO) "Connection Reform Results" (January 2026), large-scale battery sites are already over three times oversupplied, and the urgent national need for further solar deployment has reduced significantly. If the strategic benefit is minimal, the justification for imposing major local harm is fundamentally weakened. Wellingore Parish Council believes the proposed development fails the planning balance test.	The need for the Proposed Development is set out fully in the Statement of Need **[APP-184]**. The UK's transition to a low-carbon energy system is necessary to avoid the effects of climate change. Increasing solar generation plays a key part in achieving the UK's legally binding target to achieve net zero by 2050, in line with the Climate Change Act 2008 (as amended) – as stated in Chapter 4: Alternatives and Design Evolution of the ES **[APP-029]**, paragraph 3.3.20 of NPS EN-1 recognises that solar (alongside wind) is the lowest cost way of generating electricity, and that analysis shows that "a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar" – and is critical to the provision of adequate low-carbon electricity to meet increasing demands. Any future energy system must be resilient and affordable, and solar PV has been identified as being vital for a decarbonised grid and can support security of supply as part of a portfolio of different generation technologies, including wind and nuclear. Large-scale solar is an essential part of the future electricity system which must be deployed where there is the natural resource, where suitable land is available, and in proximity to available grid connection locations, such as the area local to the Proposed Development, in line with the overarching NPS EN-1. The Proposed Development represents a significant opportunity in this respect and would provide a significant contribution to the delivery of the UK Government's commitment to achieve net zero emissions by 2050. There is no planning policy requirement at either the national or local level to assess or limit renewable energy development on the basis of a perceived "oversupply" within a particular county or area. The NPSs support the delivery of renewable energy infrastructure to meet national decarbonisation, energy security and climate change targets, which are need-based at a national scale.
REP1-068	Assessment of Alternatives	Thousands of acres of commercial and industrial rooftops remain unused for solar generation nationwide. Prioritising high quality agricultural land and sensitive landscapes before exhausting rooftop and brownfield options contradicts the principles of sustainable site selection. The applicant has not adequately demonstrated why lower impact alternatives have been dismissed.	The Applicant has responded in detail to comments relating to site selection and the assessment of alternatives within **Table 7-12** of the **Applicant's Response to Relevant Representations [REP1-047]** (Page 320).
REP1-068	Cumulative Impact	This application follows closely after the Springwell Inquiry and forms part of a series of extremely large energy schemes across the district. When combined, these projects exceed the size of the City of Lincoln itself. For local communities, the cumulative effect is overwhelming and unsustainable. Each approval sets precedent for further erosion of countryside, progressively industrialising the area. Wellingore Parish Council urges the Inspector to consider cumulative harm as a critical factor in this examination.	The Applicant has responded in detail to comments relating to cumulative impacts within **Table 7-10** of the **Applicant's Response to Relevant Representations [REP1-047]** (Page 294).

5.8 Thurlby Parish Meeting [REP1-069]

Table 5-8: Applicant's Responses to Parish Councils – Thurlby Parish Meeting

Ref. No.	Theme	Thurlby Parish Meeting Written Submission / Summary of Written Representations	Applicants Response to Thurlby Parish Meeting Written Representations
REP1-069	General	Thurlby Parish objects to the Fosse Green Energy planning application, citing serious concerns about site selection, lack of detail, safety, landscape impact, and the applicant's financial credibility.	The Applicant notes the Parishes Council's comment and has responded to the concerns in detail in the points below.
REP1-069	Context and Setting	Thurlby is a small historic hamlet surround by farmland and open spaces with few houses, minimal lighting, open skies, a 1,000-year-old church, and war graves of national and international importance. The proposal would surround the hamlet on three sides with solar panels close to homes, listed buildings, and ancient monuments.	As shown on the Works Plans **[AS-105]**, the Proposed Development is a considerable distance from Thurlby. At its closest point, the Proposed Development is approximately 380m north west of the Proposed Development to the nearest residential property. Land within the Order Limits does have a predominantly rural character; however, consideration of the landscape has been integral to the design of the Proposed Development. The design has sought to respect the wider landscape and the intrinsic value of the countryside and natural environment. The Design Approach Document **[APP-186]** explains the design principles that were developed at an early stage, and which provided a framework for evolution of the design of the Proposed Development. The Design Principles prepared for the Proposed Development establish a clear framework for delivering good design. This includes, for example, where the Principal Site layout sought to avoid siting solar PV and BESS infrastructure immediately surrounding residential dwellings and small settlements to minimise the potential for adverse impacts on visual amenity and glint and glare. With regards to light pollution, as secured within the Framework OEMP **[REP1-033]** (ref. LV-O3), the proposed lighting has been designed to avoid light pollution and adverse effects. The following mitigation has been embedded: • No areas of the Proposed Development will be continuously lit. • Operational lighting will be triggered by Passive Infra-red Detector (PID) systems, which will be installed around the perimeter of the Proposed Development. • Lighting will be directional with care to minimise potential for light spillage beyond the DCO Site particularly towards neighbouring properties, habitats, highways or waterways. • Lights installed will be of the minimum brightness and/or power rating capable of performing the desired function. • Light fittings will be used to reduce the amount of light emitted above the horizontal (reduce upward lighting). • The lighting of the primary substation will be motion sensor triggered, that would operate from dusk. • Low level lighting on specific operational units will be triggered by motion sensors, from dusk. • The inward facing CCTV cameras will typically use night-vision technology and will not require additional lighting. Production of a detailed OEMP, which is to be developed substantially in accordance with the Framework plan, will be secured under Requirement 13 of the **Draft DCO [REP1-007]**.

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			The historic landscape aspects are considered within Appendix 7-E Historic Landscape Character Assessment of the ES **[APP-128]** (with the detailed assessment of the potential effects upon heritage assets presented within Appendix 7-D: Detailed Heritage Asset Setting Assessment of the ES **[APP-127]**) and the Applicant is of the opinion that a proportionate level of assessment with regard to historic landscape (and its contribution to the significance of heritage assets) was undertaken taking into account the overall significance and impacts from the Proposed Development. Assets in Thurlby (Grade II* listed Church of St Germain, Grade II Rectory and Thurlby Hall) were also assessed in detail. The assessment concluded that the Proposed Development was designed to ensure the rural experience of the assets is retained (with solar panels introduced at distance of c. 480m south of the Rectory, 590m west, 510m north-west of the Hall and 500m north-west and 360m north-east of the Church). This will result in no change to the physical fabric of the Listed Buildings, their relationship with their associated garden plots, the adjacent roads, and the fields directly surrounding their plots and the rural context of the setting of the Listed Buildings will be unaffected, resulting in no harm to the assets' significance.
REP1-069	Impact on Thurlby	Owing to the lack of substantive detail, and the position that much of what detail is available, being caveated/classified by the applicant as "indicative"; it is very difficult for us to determine exactly to what extent all these solar panels and associated structures will impact onto the hamlet. Maps have been very vague and wide ranging in the lack of detail and have been difficult to obtain on a scale that we as a Parish can understand. They seem to illustrate a wide indicative area but no definitive facts.	The application has been submitted at "outline" design stage, which is common practice for Development Consent Order applications of this nature. The Order Limits and Proposed Development Parameters **[REP1-029]** define the extent of the authorised development and provide certainty over the scale and location of the Proposed Development. The Rochdale Envelope approach has been adopted for environmental assessment, as set out in Chapter 5: Environmental Impact Assessment Methodology of the Environmental Statement (ES) **[APP-030]**. The Rochdale Envelope provides a framework for assessing the maximum (and where relevant, minimum) parameters, including the limits of deviation (e.g. development extents or specific maximum heights) as relevant, for the Proposed Development where flexibility needs to be retained. This approach also ensures that the worst-case scenario is assessed. The result is that the impacts of the Proposed Development will only be equal to or less than those concluded in the assessments of the ES. The detailed design of the Proposed Development will be developed post-consent but will be required to remain within the parameters assessed and authorised by the DCO. Further control will be secured through the Requirements included within the **Draft DCO [REP1-007]**, which provide that the approval of the relevant planning authority (in consultation with relevant statutory bodies) is required in relation to detailed layout, landscaping and environmental management measures.
REP1-069	Site Selection and National Policy	It is believed that Fosse Green Energy (FGE) misrepresents National Policy in this regard when they state *"the proposed location is suitable and aligns with national policy, including EN-1 and EN-3."* The first key point is that of "Proximity to Infrastructure" and that EN-1 and EN-3 both emphasise that sites should: • Be reasonably close to grid connection points (substations, transmission lines).	The Grid Connection Statement **[APP-200]** confirms that the Applicant has secured a connection to the proposed National Grid substation near Navenby. As stated in Section 2.3 of Appendix A: Site Selection Report of the Planning Statement **[AS098]** the Applicant was approached by a group of landowners who were willing to provide land north of the A46 at Morton Manor and Housham Grange, which comprises a large area of contiguous land, for the purposes of a nationally significant infrastructure project related to solar energy generation. Following a review of available capacity in the transmission network, the Applicant identified a line in and line out connection into the

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		• To choose sites that can achieve a grid connection to an existing electricity substation with capacity. • Minimise the need for extensive new infrastructure, especially long grid connections. • Support efficient delivery and operation of the energy system. • That Grid accessibility is a material locational consideration.	400kV Overhead Line close to Whisby Hall. A desk top review of the site to consider planning and environmental constraints concluded that the site was viable, and accordingly, a formal application was made to National Grid for a connection into the 400kV Overhead Line. However, National Grid informed the Applicant that this point of connection (POC) was not available and instead the Applicant was offered and subsequently secured a POC at the proposed National Grid substation near Navenby, which was a location capable of serving multiple customers, including the Applicant. Following confirmation of the POC, further land was secured to the south of the A46 which brought the site closer to the proposed National Grid substation near Navenby to support delivery of the Proposed Development. As Appendix A: Site Selection Report of the Planning Statement **[AS-098]** further sets out in paragraph 2.3.3, given the identification of the Site for the Proposed Development was driven by the availability of deliverable land and site suitability in line with the requirements of policy and in recognition of the need to consider reasonable alternatives, the Applicant sought to assess the Site against other potential alternative sites to ensure it was the most suitable taking into account operational requirements, national and local planning policy and planning and environmental constraints. No suitable sites of the required scale were identified within a viable distance of the proposed grid connection near Navenby.
REP1-069	Site Selection and National Policy	The second key point is that of “Land Use”. National Policy (NPS EN-3 -reference Paras 2.10.21, 2.10.23, 2.10.17) prioritises the use of brownfield, previously developed, contaminated and industrial land for solar projects. • There are numerous and various alternative locations which would have emerged from a proper, professional site selection process across the UK. This is a Nationally Significant Infrastructure Project and should be taking a National perspective on appropriate sites compliant with National Policy. • The FGE Site Selection Report (Para 2.3.1, Appendix A, document APP-185) clearly states that the site was selected as the result of an approach from local landowners. It was not selected following a search for sites that would utilise the types of land that NPS EN-3 prioritises for solar deployment (brownfield, previously developed, contaminated and industrial land) or sites that could achieve a connection to the existing grid infrastructure, as also prioritised by NPS EN-3. The Site Selection Report only considers alternative sites within a small area of Lincolnshire, indeed North Kesteven for a National project. • The proposed justification by FGE for this application is founded upon the National requirement to develop “green energy resources” rather than a North Kesteven or even Lincolnshire requirement. • Please note that Lincolnshire is viewed as a net exporter of electricity to the rest of the UK due to having an oversupply of electricity for local Lincolnshire requirements.	As set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**, the identification of the site for the Proposed Development was driven by the availability of deliverable land and site suitability in accordance with the requirements of policy. Section 2 of Appendix A: Site Selection Report of the Planning Statement **[AS-098]** sets out the relevant policy, and Section 3.3 describes how planning and environmental constraints were considered, taking into account the requirements of policy. For example, internationally and nationally designated biodiversity sites were excluded and in terms of flood risk which requires a sequential approach, the Applicant considered land at lower risk of flooding (Flood Zone 1) in the search for an unconstrained site before introducing Flood Zones 2 and 3 into the area of search at a later stage. Appendix A: Site Selection Report of the Planning Statement **[AS-098]** also sets out how the Applicant sought to reduce the need for the use of Compulsory Acquisition powers, meaning that the availability of landowners willing to lease land for the Proposed Development was an important consideration. Taking account of the suitability of the location for solar infrastructure, the availability of a network connection, appraisal of planning and environmental constraints and willing landowners, the Site was selected to be taken forward for the Proposed Development. Following selection, and through the process of design evolution, the Applicant has sought to minimise impacts wherever possible. The site selection process seeks to verify the location of the Proposed Development by considering whether the site is the most suitable for the purposes of the Proposed Development taking into account operational requirements, national and local planning policy and environmental constraints. As set out in the Statement of Need **[APP-184]** and supported by the Government’s overarching NPS for Energy (NPS EN-1) and NPS for renewable energy infrastructure

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			(NPS EN-3), while smaller-scale solar on rooftops or brownfield land contributes to decarbonisation, it is unlikely to deliver the scale of generation needed at the required pace and cost. Large-scale solar is an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Proposed Development, in line with NPS EN-1. Reasonable alternatives were considered during the site selection process (see the Appendix A: Site Selection Report of the Planning Statement **[AS-098]**), including brownfield and non-BMV land. No suitable sites of the required scale were identified within a viable distance of the proposed grid connection near Navenby. The Proposed Development has been designed to minimise impacts on BMV land, with only 1.5 ha (3.7 acres) of Grade 3a land permanently lost to ecological enhancement which is noted as likely to be beneficial to the soil resource, although it is acknowledged that the withdrawal of land from agricultural production has been established as a minor adverse effect. Regarding the comment that no consideration has been given to the risk of oversupply as a result of the various proposals, there is no planning policy requirement at either the national or local level to assess or limit renewable energy development on the basis of a perceived “oversupply” within a particular county or area. The NPSs support the delivery of renewable energy infrastructure to meet national decarbonisation, energy security and climate change targets, which are need-based at a national scale, not constrained by administrative boundaries such as Lincolnshire. Where multiple schemes exist or are proposed, cumulative effects are assessed in accordance with established guidance (e.g. GLVIA3), which consider the potential cumulative impacts associated with multiple developments, rather than the concept of ‘oversupply’.
REP1-069	Site Selection and National Policy	The Clean Power 2030 Initiative further contradicts and undermines FGE’s site selection. This initiative emphasises strategic site selection for energy infrastructure, with key conditions and criteria used for selecting site locations highlighting:- • Proximity to existing grid infrastructure, • Brownfield land — previously developed and now disused — is explicitly preferred for clean energy infrastructure due to faster permitting and community acceptance. In summary, we contend that an appropriate Site Selection process for an application for renewable energy installations – especially solar – should be conducted in line with National Policy and on a National Perspective rather than exclusively in a small, focussed section of land in North Kesteven, Lincolnshire.	The Applicant notes this comment and has responded to the proximity to existing grid connection in the rows preceding this within this table. Paragraph 2.10.29 of NPS EN-3 states that while land type should not be a predominating factor in determining the suitability of the site location, preference should be given to using brownfield and non-BMV land. Appendix A: Site Selection Report of the Planning Statement **[AS-098]** outlines that local authority brownfield land registers were consulted to identify the opportunities to utilise brownfield land. Specifically, this was in Stage 3 of the site selection process, where an assessment of brownfield land within the area of search was undertaken including land within the boundaries of NKDC, South Kesteven District Council, East Lindsey District Council, West Lindsey District Council and the City of Lincoln Council. The Written Summaries of Oral Submissions Issue Specific Hearing 1 **[REP1-046]** set out the brownfield sites considered. Sites smaller than 1ha were discounted due to their inability to provide a viable land parcel of 40ha (99 acres), either individually or when combined with other brownfield sites. The Applicant identified 40ha (99 acres) as this is the size that would constitute one circuit at the chosen Medium Voltage of 33kV for the Proposed Development which would avoid the need for splitting circuits between smaller parcels involving a higher environmental impact for more interconnecting cables and avoids the need for more third party land.

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			Of the sites over 1ha in size, none were large enough to provide a viable land parcel of at least 40ha (99 acres), therefore no individual brownfield site from the register provided an adequate area to facilitate a large-scale solar project over 50 MW. Furthermore, two of the three sites have planning permission for residential development or for residential/mixed use development. Table 5-1 of Appendix A: Site Selection Report of the Planning Statement **[AS-098]** details these sites and Figure 7 shows these sites on a plan. The search of PDL identified no land of sufficient size to facilitate a large-scale solar project either individually or in combination with other sites. In conclusion, no suitable areas of brownfield or non-agricultural land at the appropriate scale were found within a viable search area of the point of connection at the proposed National Grid Substation near Navenby.
REP1-069	BESS	The recent National Energy System Operator's (NESO) announcement, of 8th December 2025, recognised that the position on achieving the UK government's target capacity had reached a status of being three times oversubscribed in actual and development pipeline capacity. Consequently, the proposed BESS in this application is surplus to national need and should be withdrawn from the application. Further, the lack of detail about what the applicant is actual proposing, both undermines the Parish's ability to comprehend what it might be facing, and curtails our ability to properly comment. Consequently, our comments are restricted to the following. If the applicant is not withdrawing the BESS element of this project: • We request that the Inspectorate require the applicant to urgently clarify what is actually being planned. • We request that the Inspectorate require the applicant to urgently evidence the grid connection status.	The Applicant considers that the BESS has been thoroughly and appropriately designed, with the design developed in consultation with LFRS, taking account of guidance from the NFCC, as set out in the Framework BSMP **[REP1-041]**. A description of the BESS component of the Proposed Development is provided in ES Chapter 3: The Proposed Development **[REP1-015]**. Regarding the comment that no consideration has been given to the risk of oversupply of BESS, there is no planning policy requirement at either the national or local level to assess or limit renewable energy development on the basis of a perceived "oversupply". The NPSs support the delivery of renewable energy infrastructure to meet national decarbonisation, energy security and climate change targets, which are need-based at a national scale. Where multiple schemes exist or are proposed, cumulative effects are assessed in accordance with established guidance (e.g. GLVIA3), which consider the potential cumulative impacts associated with multiple developments, rather than the concept of 'oversupply'. The reference to the NESO announcement relates to projects which were given a connection notification to connect by 2030 (Phase 1) and by 2035 (Phase 2). The Applicant still expects to receive a connection offer for the BESS and is currently discussing this with NESO and awaiting further news. The Grid Connection Statement **[APP-200]** confirms that the Applicant has secured a connection to the proposed National Grid substation near Navenby.
REP1-069	BESS	Regardless of the lack of detail provided by the application, there are serious, founded concerns regarding BESS safety. • We would like to draw the Inspectorate's attention to the latest advice from the UK Health and Safety Executive which raises serious and well-documented concerns regarding the safety of Battery Energy Storage Systems (BESS). • If the proposal is to distribute multiple BESS "compounds" across the site, this significantly increases the land area affected and exacerbates the adverse impact on the landscape. • Whether the units are clustered or dispersed, the applicant's reliance on an overly optimistic accident rate is not credible. In particular, the assertion that a fire would not spread to adjacent units and that contaminated fire-fighting water would not enter local watercourses is unsupported by real-world evidence.	The Applicant emphasises that the potential safety risks of BESS are well known in 2025, whereby design requirements, standards and guidance have evolved in response to greater understanding. The Electric Power Research Institute (EPRI) BESS Failure Incident Database was established in 2021 as an information tool for both energy storage industry stakeholders and the public. Statistically, the significant global increase in BESS deployments means that there will be a likely increase in the number of failure events. However, BESS failure rates have dropped by 98% worldwide between 2018 to 2024 as lessons learned from BESS failure events have been incorporated into BESS design, testing requirements, control and monitoring systems, safety standards, and construction and operations best practices. With regards to fire safety, the Framework BSMP **[REP1-041]** considers the latest advice from the NFCC, H&S, and UKHSA, and sets out design and mitigation measures to be implemented as part of the Proposed Development detailed design. The Applicant has

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		• Planning permission should not be granted until clearer and more stringent national guidance is in place regarding minimum safe separation distances between BESS installations. • Given the distinct and substantial safety risks involved, the BESS element should be the subject of a separate planning application and assessed independently from the associated solar development.	consulted the NFCC guidelines and engaged with LFRS throughout the pre-application phase, whereby close consultation will continue with LFRS throughout the planning process. The provision of a detailed CEMP, OEMP, DEMP and BSMP, which are to be substantially in accordance with the framework plans, is secured under Requirements 12, 13, 20 and 7 of the Draft DCO **[REP1-007]** respectively. It should be noted that the breach of any commitments under a DCO amounts to a criminal offence and the provisions and Requirements of a DCO are enforceable by the Local Planning Authority. The Applicant's Framework BSMP **[REP1-041]** was drafted to comprehensively address all key BESS safety requirements through failure prevention, monitoring / control systems, and hazard mitigation systems / protocols. These are specifically documented in the Framework BSMP **[REP1-041]** under the following sections: • Section 1.3: Potential BESS Failure • Section 1.4: Safety Objectives • Section 1.5 Consultation with Lincolnshire Fire & Rescue Service (LFR) • Section 1.6: Relevant Safety Guidance for the Scheme (UK and International) • Section 2: BESS Safety Requirements • Section 3: BESS Construction and Operation Requirements • Section 4: Firefighting Requirements • Section 5: Pre-construction Requirements secured through the DCO Section 5 documents how the detailed design phase of the Proposed Development will consider the lifecycle of the battery system from installation to decommissioning. At the detailed design stage, risk assessment tools will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit. These tools and reports will ensure that there are no significant off site impacts on the local community. Section 4.5 of the FBSMP documents how BESS fire pollution issues will be addressed (fire emissions and water pollution). Section 5.1.10 of the FBSMP stipulates that Emergency Response Plans (ERPs) covering construction, operation and decommissioning phases will be developed once a construction team, and an operator have been appointed. These plans will be developed in consultation LFRS and other local emergency services to include the adequate provision of firefighting equipment onsite and ensure that fire, smoke, and any release of toxic gases from a thermal runaway incident does not significantly affect site operatives, first responders, and the local community. The provision of a detailed BSMP, which is to be substantially in accordance with the framework plan, is secured under Requirement 7 of the Draft DCO **[REP1-007]**. The Proposed Development includes embedded design mitigation and protection measures to reduce fire/explosion risk, which are detailed in the Framework BSMP **[REP1-041]**. These measures include an automatic cooling system which will be integrated into the BESS to stop or reduce battery cell thermal runaway propagation. The

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			BESS is designed so that in the event one cell overheats/catches fire, there is sufficient distance between the cells to mitigate the risk of this spreading (to keep a fire isolated to a single cell (to the extent which it is possible to control this)). This layout has been developed in consultation with the LFRS and has taken account of guidance from the NFCC. Communication with the LFRS will continue through the detailed design and construction stages. It should be noted that there have been only two operational fires for utility scale BESS fires in the UK to date, both of which were built prior to the current NFCC safety guidance, meaning that the battery type and design which caused these fires no longer adhere with the NFCC guidelines, and therefore will not be used within the BESS of the Proposed Development. Control of firewater runoff is set out within Appendix 9-D Framework SWDS **[REP1-025]**. This states that swales will be lined with an impermeable membrane or similar to prevent any pollution associated with fire water runoff from entering the ground. Automatic penstock control valves will also be used in the event of a fire to prevent any pollution associated with fire water runoff from entering the local watercourses without prior testing. A detailed drainage strategy will be prepared, to be substantially in accordance with the framework, as secured by Requirement 10 of the Draft DCO **[REP1-007]**. These measures will ensure that there will be no significant effects arising from the potential contamination of surface water or groundwater. The comment that distributed BESS would be worse from a landscape and visual perspective is noted, however the Applicant disputes this and refers the parish council to Chapter 10 Landscape and Visual **[AS-117]** which does not attribute any likely significant effects to the distributed BESS. The height of the distributed BESS (a maximum 3.5m (Proposed Development Parameters **[REP1-029]**)) and commitment to space them at least 150m from residential receptors (Framework BSMP **[REP-041]**) has adequately reduced the visual effects of these components.
REP1-069	Funding and Corporate Structure	Funding - Planning Inspectorate Scheme Reference EN010154 Application Document Reference EN010154/APP/4.2 There is considerable concern arising from the financial nature, and lack of corporate substance of the applicant and its corporate connections. There appears to be just a trail of debt, no capital and an absence of employees, extending from FGE through its connections to Canadian Solar Projects Ltd in the UK and then internationally to the Netherlands and Canada. In the applicant's Funding Statement, 1.2 Corporate Structure, it states that the majority shareholder (72.5%) in the applicant is Rugeley West Solar Ltd (RWS), which is an entity owned by Recurrent Energy. However, in RWS's Companies House accounts it appears that the "significant control" is held by CS UK Holdings III Ltd. who in turn has "1 person with active control – Canadian Solar UK Projects Ltd". The latter, in turn, has "1 person with active control – Canadian Solar Inc. Active, Canada, and states "that it is a wholly owned subsidiary of Canadian Solar Inc".	The financial position of the Applicant and the proposed funding structure for the Proposed Development is detailed within the Funding Statement **[AS-014]** This document sets out the estimated current capital cost for the Proposed Development and the Proposed Development funding strategy, including confirmation that Recurrent Energy has access to significant funds to implement the Proposed Development. Fosse Green Energy Limited is a company registered in England and Wales with Companies House (Company number 13438725). It is owned by Windel Energy Ltd, a company registered in England and Wales, and Rugeley West Solar Limited, another company registered in England and Wales. Rugeley West Solar Limited is owned by CS UK Holdings III Limited which is part of Recurrent Energy which is a subsidiary of Canadian Solar Inc. Both companies have a strong UK presence, with over 100 Recurrent Energy employees located in the UK. It should be noted that the Proposed Development is intended to benefit the English ownership as well as the Canadian Solar investors – the Applicant will remain an English company during the operation of the Proposed Development.

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		It is unclear whether Recurrent Energy (in whichever of its forms based in the Netherlands) actually owns RWS as stated, or is merely a corporate division of Canadian Solar Inc which engages with it operationally. We note that the Inspectorate in its letter, EN010154 Date: 22 August 2025, queried the Funding position of the applicant – we support this challenge.	
REP1-069	Landscape and Visual Impact	The visual impact of this area will change irretrievably from open fields to an industrial landscape. .	The Applicant has sought to minimise landscape and visual impacts of the Proposed Development in its pursuit of securing good design as set out in the Design Approach Document **[APP-186]**. The Applicant acknowledges that there would be some adverse effects on the visual amenity of surrounding villages resulting from the Proposed Development, as detailed within Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**, but considers that these would only be in the short to medium term during construction and the early years of operation. There are no significant long term visual effects anticipated on residents of local villages as, by year 15 of operation, the proposed landscaping would have matured such that views of solar PV infrastructure within the Principal Site would be screened. While the Proposed Development covers a large site area, its scale has been informed by a comprehensive, iterative design process that has sought to minimise landscape and visual effects, developed and refined in response to consultation feedback from statutory consultees, local stakeholders and persons with land interest, with such engagement helping to shape the layout and approach to land use to minimise environmental impacts. The Proposed Development does not physically surround any village, the individual areas of proposed infrastructure are located at varying distances from settlements and are separated by existing landscape features, agricultural land, and new planting. Although nearby villages lie in relative proximity to parts of the Proposed Development, the Proposed Development has been designed such that it does not physically surround any of these villages. Instead, each village retains separation from the Principal Site by intervening farmland, existing landscape features and new mitigation planting. While the Proposed Development comprises infrastructure for solar energy generation and associated development (such as BESS), the land is not permanently changed to industrial use in land use planning terms, and it should be noted that the Proposed Development also includes a significant amount of retained arable land.
REP1-069	Landscape, Traffic, Noise and Pollution Impacts	Lincolnshire has an age-old agricultural foundation which surrounds isolated dwellings and hamlets such as ours. It is not only the solar panels that will impact the landscape, but the construction of the project, traffic, noise, pollution for at least two to two and a half years.	Impact on Daily Life and Residential Amenity **Traffic** An assessment of the potential effects relating to additional construction traffic, is set out within Chapter 13: Traffic and Transport of the ES **[APP-038]**, in accordance with the legislation and planning policy outlined in Appendix 13-A of the ES **[APP-163]**. This concludes that the Proposed Development is not expected to result in any significant effects with the proposed embedded mitigation in place. The Framework CTMP **[REP1-043]** sets out the measures to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network, in order to limit potential disruptions and implications on the wider transport network. Production of a detailed CTMP is secured under Requirement 14 of the Draft DCO **[REP1-007]**. The assessment has used the shortest expected construction programme (24 months), which provides a worst-case scenario in terms of construction vehicle trips as this is based on a rapid, and so shorter, construction period that would generate the highest number of peak hour and daily road trips on the local network. LCC and National Highways in their capacities of being responsible for the local and strategic road networks, respectively,

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have deemed the impacts on the road networks to be acceptable in principle **[RR-157]** and **[RR-201]**.

The Framework CTMP **[AS-102]** sets out the measures to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network, in order to limit potential disruptions and implications on the wider transport network.. In particular, and where practicable, HGV routing is expected to follow the most direct routes to and from the construction access points from the A46 for the Principal Site and to/ from the A15 for the Cable Corridor. This approach avoids HGV movements through surrounding villages such as Thurlby. The Framework CTMP **[AS-102]** will restrict HGVs to routes which avoid smaller surrounding villages when travelling to/ from the construction compounds as illustrated by HGV routing plan shown in Figure 13-4 **[APP-110]**,The CTMP establishes controls to ensure that any construction traffic routed close to surrounding villages is appropriately managed, with measures in place to protect pedestrian, cyclist and equestrian safety and to maintain the quiet character of the village as far as practicable. Specifically, regarding Clay Lane, it should be noted that the Proposed Development proposes to use this as an operational access only, where development traffic levels will be nominal. No construction traffic will use Clay Lane. Clay Lane/ Station Road/ Lincoln Lane is an existing junction and will only be used in the operational phase, by small numbers of routine maintenance vehicles predominantly.

Production of a detailed CTMP, which is to be developed substantially in accordance with the Framework plan, will be secured under Requirement 14 of the Draft DCO **[REP1-007]**.

Noise and disturbance

As explained in Chapter 3: The Proposed Development of the ES **[REP1-015]**, construction activity is expected to last between 24 and 30 months. Noise from construction activity, including piling, is assessed in Chapter 11: Noise and Vibration of the ES **[APP-036]**. With the embedded and additional mitigation measures, identified in Section 11.6 and 11.8 respectively and secured through the Framework CEMP **[REP1-031]**, significant adverse effects on health and quality of life from construction noise are not expected. Results presented for receptor R12 in Table 1114 of Chapter 11: Noise and Vibration of the ES **[APP-036]** show that construction noise levels in Norton Disney will be below the level at which adverse effects on the quality of life would occur. Furthermore, construction noise levels have been predicted under the worst-case assumption that all construction activity would be occurring simultaneously when, in practice, given the size of the Order Limits, activities in any given location will only occur for a fraction of the full construction schedule.

Table 11-19 of Chapter 11: Noise and Vibration of the ES **[APP-036]** presents the results of the operational noise calculations under a series of reasonably worst-case assumptions, such as the wind blowing from the source to the receiver. While it is true that substation transformers can produce a low-frequency hum, this would not be perceptible in Norton Disney given its distance from the substation site and no receptors will be significantly adversely affected by operational noise.

With reference to R12 in Table 11-19 of Chapter 11: Noise and Vibration of the ES **[APP-036]**, operational noise levels from the Proposed Development in Norton Disney are

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			expected to be well below the existing background sound level (i.e. the 'relative quiet' of a location) in the area. In addition, the Framework OEMP **[REP1-033]** (ref. NV-01) makes a commitment that the final operational noise levels from the Proposed Development will be no higher than those predicted in Chapter 11: Noise and Vibration of the ES **[APP-036]**; modelling will be undertaken at the detailed design phase (as secured by measure NV-01 of the Framework OEMP **[REP1-033]**) to confirm the noise levels at sensitive receptors will not exceed these thresholds. Production of a detailed OEMP, which is to be developed substantially in accordance with the Framework plan, will be secured under Requirement 13 of the Draft DCO **[REP1-007]**. Furthermore, Requirement 16 of the Draft DCO **[REP1-007]** ensures that the operational noise levels set out in Table 11-21 of Chapter 11: Noise and Vibration of the ES **[APP-036]** are to be complied with. **Dust and Air Quality** As outlined in Chapter 3: The Proposed Development **[REP1-015]**, construction activity is expected to last between 24 and 30 months. Potential impacts from dust and air quality during construction are assessed in Chapter 14 Other Environmental Topics of the ES **[APP-039]**, Section 14.2: Air Quality. With the embedded mitigation measures identified within Section 14.2: Air Quality (Paragraph 14.2.50 onwards) of Chapter 14: Other Environmental Topics of the ES **[APP-039]** and additional measures (such as the development and implementation of a Dust Management Plan) which are secured through the Framework CEMP **[REP1-031]** (ref. AQ-C1), Framework OEMP **[REP1-033]** (ref. AQ-O1) and Framework DEMP **[REP1-035]**, (ref. AQ-D1), significant adverse effects on health, amenity, or local air quality from construction dust are not expected. Production of a detailed CEMP, OEMP and DEMP, which are to be developed substantially in accordance with the Framework plans, will be secured under Requirements 12, 13 and 20 of the Draft DCO **[REP1-007]** respectively. The assessment considers reasonably worst-case assumptions, including dry weather conditions and the presence of earthworks and heavy construction traffic. Dust-generating activities will be temporary and localised, and mitigation measures such as water suppression, wheel washing, and material handling controls will be implemented in accordance with best practice and Institute of Air Quality Management (IAQM) guidance. The ES concludes that, with these controls in place, dust deposition on sensitive receptors such as homes, gardens, and crops will be minimised and will not result in significant adverse effects. The commitments to air quality mitigation measures included within the Framework CEMP **[REP1-031]** (ref. AQ-C1), which is to be developed into a detailed CEMP substantially in accordance with the Framework plan, as secured under Requirement 13 of the Draft DCO **[REP1-007]**, will ensure that these commitments are reflected in the detailed CEMP and communicated to all contractors.
REP1-069	Temporary vs Permanent	There is then the ongoing maintenance, lighting, high hedges forming a 'tunnel' effect. Forty to sixty years is hardly 'temporary' and in reality the land will never be able to be returned to growing crops thus impacting on our food security. Jobs will have been lost in all sectors connected with agriculture including haulage companies, seed and fertiliser suppliers and other smaller suppliers who are dependent on the countryside for their livelihood.	**Operational Lifespan** The reference to temporary is correct in planning terms as although the infrastructure will remain for 60 years, it will be removed at decommissioning in line with the measures set out in the Framework DEMP **[REP1-035]**, a detailed version of which is to be developed, substantially in accordance with the framework plan, as secured under Requirement 20 of Schedule 2 of the Draft DO **[REP1-007]**. The non-permanent and reversible nature of a solar NSIP with 60 year consent has also been acknowledged in the Secretary of State's decisions on a number of solar NSIPs, such as Tillbridge Solar Farm, Mallard Pass Solar

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Project, West Burton and Gate Burton Energy Parks, which have all been granted consent. Under Requirement 20 of the Draft DCO **[REP1-007]**, decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational life of the Proposed Development, the substation will be decommissioned and the land will be available for its current use, although the landowners would choose how the land is to be used and managed.

During the operational phase of the Proposed Development, any disruption resulting from replacement or repairs would be minimal – as stated in Chapter 3: The Proposed Development of the ES **[REP1-015]** (ref. Section 3.5), activity on the Principal Site will be limited and would be restricted principally to vegetation management, equipment maintenance and servicing, periodic replacement of components, periodic fence inspection, and monitoring to ensure the continued effective operation of the Proposed Development. It is anticipated that maintenance and servicing would include the inspection and, if required, renewal and removal, reconstruction, refurbishment or replacement of faulty or broken equipment, but not the removal, reconstruction or replacement of the whole of Work No. 1 (as defined in Schedule 1 of the Draft DCO **[APP016]**) at the same time. Maintenance activity would be phased and would therefore be considerably less intensive than during construction. The Framework OEMP **[REP1-033]** secures mitigation and management measures to be implemented during the operational phase of the Proposed Development to minimise disruption, for example (ref. NV-O1) modelling will be undertaken at the detailed design phase to confirm the noise levels at sensitive receptors will be no higher than the levels presented within the table at NV-O1. The provision of a detailed OEMP, which is to be substantially in accordance with the framework plan, is secured via Requirement 13 of the Draft DCO **[REP1-007]**.

Lighting and security systems

With regards to light pollution, as secured within the Framework OEMP **[REP1-033]** (ref. LV-O3), the proposed lighting for the Proposed Development has been designed to avoid light pollution and adverse effects, including the following:

- No areas of the Proposed Development will be continuously lit.
- Operational lighting will be triggered by Passive Infra-red Detector (PID) systems, which will be installed around the perimeter of the Proposed Development.
- Lighting will be directional with care to minimise potential for light spillage beyond the Order Limits particularly towards neighbouring properties, habitats, highways or waterways.
- Lights installed will be of the minimum brightness and/or power rating capable of performing the desired function.
- Light fittings will be used to reduce the amount of light emitted above the horizontal (reduce upward lighting).
- The lighting of the primary substation will be motion sensor triggered, that would operate from dusk.
- Low level lighting on specific operational units will be triggered by motion sensors, from dusk.
- The inward facing CCTV cameras will typically use night-vision technology and will not require additional lighting.

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Production of a detailed OEMP, which is to be developed substantially in accordance with the Framework plan, will be secured under Requirement 13 of the Draft DCO **[REP1-007]**.

Hedgerows

As noted in the Framework LEMP **[REP1-039]** (ref. paragraphs 4.1.8 – 4.1.13), all solar PV panels and associated infrastructure have been sited within the existing field pattern, protecting existing vegetation, and maximising the natural screening provided by field boundary vegetation which will be supplemented with additional planting. The solar PV panels and associated infrastructure have been sited to preserve, as far as possible, cross valley views from Thorpe-on-the-Hill and important views towards Lincoln Cathedral from Tunman Hill. Larger infrastructure, such as the Onsite Substation and BESS Compound, have been located within areas of enclosed landscape, bound by frequent small woodlands and hedgerows, to minimise potential visual effects.

New and enhanced hedgerows have also been proposed to provide screening where appropriate. The detailed design of the Proposed Development must be in accordance with the Design Commitments, as secured by Requirement 6 of the Draft DCO **[REP1-007]**.

As secured in the Framework LEMP **[REP1-039]** the existing hedgerows will be managed at a minimum height of 3m (ref. Paragraph 5.2.10), whilst proposed hedgerows will be planted and managed between 3-4m (ref. paragraph 5.3.14) for the operational lifetime of the Proposed Development. The Framework CEMP **[APP-189]** (ref. ID GG-C1) also notes that “Native hedgerows will be planted/infilled and maintained to deliver a minimum height at least the same as the upper edge of the panels, which is currently proposed to be 3.5m”. These heights are sufficient to avoid a line of sight from the modelled receptors to the maximum upper edge of the proposed panels, which is 3.5m. The staggered planting of native hedgerows (as detailed in the Framework LEMP **[REP1-039]**, combined with directional, low-level lighting, will minimise any linear “tunnelling effect” along boundaries and ensure that visual permeability and landscape character are maintained. No areas are proposed to be permanently lit.

Job and Food Security

The Applicant recognises that there are concerns relating to the potential for the Proposed Development to impact upon food production. It is important to place the scale and nature of land use into context. As considered in Chapter 12: Socio-Economics and Land Use **[AS-016]**, the total land area required for the Proposed Development represents approximately 0.09% of the total farmland within the East Midlands, and therefore constitutes a very small proportion of the regional agricultural resource. Furthermore, research undertaken by the Applicant in 2024 indicates approximately 50% of the land within the proposed Principal Site is currently used for the cultivation of non-food crops. Of this, the majority (approximately 81%) is grown for use as fuels for carbon-intensive energy sources, rather than for direct human or animal consumption. As such, while the land is agricultural in character, its current use does not solely support food production. The Proposed Development would therefore result in a limited and proportionate change in land use, set against the wider regional context and the Proposed Development’s contribution to cleaner energy generation.

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			Following decommissioning, as set out in the Framework DEMP **[REP1-035]** (ref. paragraph 2.3.5), the land will be returned to the landowners and available for its current use, although it will be the decision of the landowners as to how they use and manage the land. The provision of a detailed DEMP, which is to be substantially in accordance with the framework plan, is secured via Requirement 20 of the Draft DCO **[REP1-007]**. With regards to economic and other benefits of BMV land, Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** has considered this as part of the assessment undertaken, for example giving consideration to the existing jobs supported by the agricultural land. As noted in paragraph 12.7.52 of this chapter, it has been confirmed by all landowners that no job losses are expected as a result of the removal of agricultural land. It is expected that when the rent revenues from the land start, there will be additional jobs created on their farms offsite as landowners diversify their land further with the underlying financial stability of the rental income.
REP1-069	Cumulative Impact	The cumulative impact of the many schemes in Lincolnshire should be taken into account as they will have an unacceptable impact on the character of the landscape	The Applicant acknowledges the concern regarding the cumulative impact of the Proposed Development on the Lincolnshire countryside and local amenity. A detailed Cumulative Effects Assessment has been undertaken and is presented in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. The Proposed Development has been subject to an iterative design process to minimise impacts on local amenity. Embedded mitigation measures have been incorporated into the design of the Proposed Development such as new planting, enhanced management of existing vegetation, and the introduction of offsets to reduce visibility of infrastructure from nearby settlements. These measures are designed to reduce the visual dominance of the development and limit the contribution of the Proposed Development to cumulative impacts. Regarding the cumulative landscape and visual impact, as summarised in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]** (ref. paragraph 15.5.24), significant adverse cumulative effects are identified on landscape and visual amenity receptors, however the significance of effect attributed to the Proposed Development alone is not increased when considering these other developments alongside the Proposed Development, as reported in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The following significant cumulative effects were established during construction, where the magnitude of effect is higher than that of the Proposed Development in isolation. During construction: • Major Adverse (significant) landscape cumulative effects upon the North Kesteven District landscape sub-area Witham and Brant Vales due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction. Additionally, changes are anticipated to the visual amenity of users of the Viking Way (PRoW Cole/2/1 and BooG/2/2 – see Figure 2-2 Public Rights of Way Plan of the ES **[AS-020]** for the location of these PRoW) as a result of the Proposed Development together with ID95 Application Reference: PL/0087/23, North Hykeham Relief Road(as per Chapter 15: Cumulative Effects and Interactions of the ES **[APP040]**), resulting in a Major adverse effect which is significant.

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- Moderate Adverse (significant) landscape cumulative effects on the North Kesteven landscape sub-area Limestone Heath due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction as a result of the Proposed Development together with ID63 Application Reference: EN010149 (as per Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**), Springwell Energy Farm and ID103 Application Reference: EN0110016 (as per Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**), Leoda Solar Farm, resulting in a Moderate adverse effect which is significant.

Moderate Adverse (significant) landscape cumulative effects on the North Kesteven landscape sub-area Limestone Heath due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction as a result of the Proposed Development together with ID63 Application Reference: EN010149 (as per Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**), Springwell Energy Farm and ID103 Application Reference: EN0110016 (as per Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**), Leoda Solar Farm, resulting in a Moderate adverse effect which is significant.

During operation (year 15) it is considered there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development and other solar NSIPs in the vicinity. With regards to the changing nature of the landscape, it is important to note that the Proposed Development is not permanent. The Applicant is seeking consent for a 60-year operational period. Under Requirement 20 of the Draft Development Consent Order **[REP1-007]**, decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational life, the land will be returned to the landowners and available for its existing use. Although it would be the decision of the landowners whether to return the land to its existing use, any material change of use would require planning permission.

The potential for significant cumulative landscape and visual effects of other NSIP scale solar schemes at greater distances from the Proposed Development has also been considered within Joint Interrelationship Reports prepared for the respective examinations of such schemes, including, Springwell Solar Farm **[EN10149]**, Tillbridge Solar Project **[EN010142]**, West Burton **[EN010132]**, and Cottam **[EN010133]**. These Reports found that, given the notable distances and lack of intervisibility between these schemes and the Proposed Development, there was no potential for significant cumulative effects.

As set out in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**, the permanent loss of BMV land as a result of the Proposed Development relates to the permanent loss of 1.5ha of Grade 3a to ecological enhancements, which is noted as likely to be beneficial to the soil resource, although it is acknowledged that the magnitude of impact relates to the withdrawal of land from agricultural production, and therefore is established as a minor adverse effect.

It is estimated that the solar NSIPs in Lincolnshire, together with the Proposed Development, account for approximately 1.4% of the BMV land in the County of Lincolnshire. Whilst there is a degree of uncertainty around this proportion (based upon available data and associated limitations of study) it is indicative that the solar NSIPs represent a small proportion of BMV land in the County. It is anticipated that these solar NSIPs, like the Proposed Development, will be temporary developments and reversible

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			(although the Applicant cannot speak for other applicants), whereby the land utilised for the Proposed Development is projected to be returned to the landowners and expected to be returned to pre-development use (i.e. agriculture) following decommissioning (although the landowners would choose how the land is to be used and managed), except for relatively small areas used for habitat creation, such as woodland planting, which is anticipated to be retained. As a result, no significant cumulative effects on agricultural land were identified for the Proposed Development when considered alongside the solar NSIPs identified in Section 12.10 Cumulative Assessment of Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**.
REP1-069	Tourism and Local Economy	The visual impact will also be felt on the tourism industry in this area as this is the second largest economy after agriculture. There are walking routes and caravan parks within the proposed site around Thurlby and as mentioned previously visitors come from all around the Country and the World to walk, stay on the caravan parks and remember those in the Commonwealth War Graves and other military graves in the grounds of the historic Church. Additionally, the immediate area is host to what has become an internationally recognised and visited music festival – The Lost Village. This is a significant social and financial event for our area which will be at risk if this industrialisation of our community proceeds.	Chapter 12 Socio-economics and Land use of the ES **[AS-016]** includes an assessment of potential effects on tourism/recreation arising from the Proposed Development (ref. Section 12.7) comprising consideration of impacts on local accommodation facilities, recreational receptors and visitor attractions. Section 12.5 identifies the size of the visitor economy and recognises that surrounding villages contain visitor and recreational attractions, and that there is also a network of Public Rights of Way (PRoWs) in the surrounding area which may be used by visitors. With due consideration given to other assessment findings set out in Chapter 10: Landscape and Visual Amenity **[AS-117]**, Chapter 11: Noise and Vibration **[APP-036]**, Chapter 13: Traffic and Transport **[APP-APP-038]** and Chapter 14: Other Environmental Topics (Section 14.2: Air Quality) **[APP-039]** as appropriate, the assessment in Section 12.7 concludes that overall the impact of the Proposed Development on tourism/recreation receptors is not significant during the construction/ decommissioning and operational phases. In respect of views from/for these receptors specifically, a Framework LEMP **[REP1-039]** has been prepared to accompany the DCO application to provide visual mitigation. Section 12.7 of Chapter 12 Socio-economics and Land use of the ES **[AS-016]** also includes an assessment of potential effects on businesses arising from the Proposed Development. Taking into account the assessment findings presented in the ES Chapters set out above this assessment concludes that there would be no significant effect on local businesses during the construction/ decommissioning and operational phases.
REP1-069	Traffic and Highways	Another main issue of concern is the traffic that will be generated around our hamlet. The routing of HGVs through Thurlby is potentially dangerous. These are unclassified roads, in some places barely wide enough for two cars to pass and two HGVs trying to pass on the narrow roads destroys verges and kerbs. The roads are hardly fit for purpose as it is and the extra input of HGVs, additional vehicles for workers and continued maintenance is not acceptable in this area. Vehicles are frequently parked on Bassingham Road in Thurlby which can create a traffic hazard and make access for large vehicles more dangerous. Clay Lane, another road identified as a 'suitable' route is also very narrow, potholed and has no passing places, hardly suitable for existing traffic and definitely not suitable for heavy vehicles.	The potential effects of construction traffic on the environment and local road infrastructure, including on safety, have been appropriately assessed in Chapter 13: Traffic and Transport of the ES **[APP-038]**, following the relevant legislation and planning policy in Appendix 13-A **[APP-163]**. This includes both Bassingham Road, and Clay Lane. The assessment concludes that the Proposed Development is not expected to result in any significant effects upon traffic and transport receptors with the proposed embedded mitigation in place. The assessment has used the shortest expected construction programme (24 months), which provides a worst-case scenario in terms of construction vehicle trips (a more condensed construction programme would result in a higher intensity of vehicle trips, the worst-case scenario would be the maximum trips per day) as this is based on a rapid, and so shorter, construction period that would generate the highest number of peak hour and daily road trips on the local network. In addition, LCC and National Highways in their capacity of being responsible for the local and strategic road networks, respectively, have deemed the impacts on the road networks to be acceptable in principle **[RR-157]** and **[RR-201]**.

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			The Framework CTMP **[AS-102]** sets out the measures to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network, in order to limit potential disruptions and implications on the wider transport network. HGV routing is expected to follow the most direct routes to and from the construction access points from the A46 for the Principal Site and to/ from the A15 for the Cable Corridor. The Framework CTMP **[AS-102]** will restrict HGVs to routes which avoid smaller surrounding villages when travelling to/ from the construction compounds as illustrated by HGV routing plan shown in Figure 13-4 **[APP-110]**. The CTMP establishes controls to ensure that any construction traffic routed through Thurlby is appropriately managed. Production of a detailed CTMP, which is to be developed substantially in accordance with the Framework plan, is secured under Requirement 14 of the Draft DCO **[REP1-007]**.
REP1-069	Consultation	The points raised above are of considerable concern to Thurlby Parishioners and we object to this proposed development. We request that an Open Forum Hearing is arranged at which the applicant will present firm and final design layouts/locations rather than the “indicative” design circulated thus far.	The application has been submitted at “outline” design stage, which is common practice for Development Consent Order applications of this nature. The Order Limits and Proposed Development Parameters **[REP1-029]** define the extent of the authorised development and provide certainty over the scale and location of the Proposed Development. The Rochdale Envelope approach has been adopted for environmental assessment, as set out in Chapter 5: Environmental Impact Assessment Methodology of the Environmental Statement (ES) **[APP-030]**. The Rochdale Envelope provides a framework for assessing the maximum (and where relevant, minimum) parameters, including the limits of deviation (e.g. development extents or specific maximum heights) as relevant, for the Proposed Development where flexibility needs to be retained. This approach also ensures that the worst-case scenario is assessed. The result is that the impacts of the Proposed Development will only be equal to or less than those concluded in the assessments of the ES. The detailed design of the Proposed Development will be developed post-consent but will be required to remain within the parameters assessed and authorised by the DCO. Further control will be secured through the Requirements included within the Draft DCO **[REP1-007]**, which provide that the approval of the relevant planning authority (in consultation with relevant statutory bodies) is required in relation to detailed layout, landscaping and environmental management measures. Furthermore, a Community Liaison Group is secured through Requirement 5 of Schedule 2 of the Draft DCO **[REP1-007]** which requires the establishment of a community liaison group prior to the commencement of the Proposed Development. Such a group has already been established by the Applicant and will continue during construction and operation. This group provides an opportunity for the local community to engage with the Applicant, learn about the detailed design post consent, express concerns, and be kept up to date.

6. Applicant's Response to Written Representations at Deadline 1 – Members of the Public

6.1 Members of the Public

Table 6-1: Applicant's Response to Members of the Public

Ref. No.	IP Name	Theme	Summary of Members of the Public Written Representations	Applicants Response to Members of the Public Written Representations
Site Selection and Alternatives				
REP1-121, REP1-122, REP1-131, REP1-132	Joanne Mawditt, John Morris, Allyson Julie Sorrell, Martin Robert Sorrell	Size and Scale	Concern regarding size and scale of the Proposed Development across small villages.	Appendix A: Site Selection Report of the Planning Statement **[AS-098]** demonstrates how the Applicant has sought to identify a suitable site that is as least environmentally constrained as possible whilst delivering the benefits of large-scale solar with regards to the contribution to the delivery of the UK Government's commitment to achieve net zero emissions by 2050. With regards to the scale of the Proposed Development, as set out in Section 3.4 of Appendix A: Site Selection Report of the Planning Statement **[AS-098]** a site of approximately 1,000 hectares (the equivalent to 2,471 acres) was deemed to be required, taking into account the necessary solar infrastructure to support the 240MW grid connection offer, the need for land to provide environmental mitigation and in order to retain flexibility The Applicant has responded in more detail to comments relating to Size and Scale of the Proposed Development in detail within Table 5-3, Section 1 of the **Applicant's Response to Relevant Representations [REP1-047]** (Page 180).
REP1-092, REP1-093, REP1-096 REP1-105, REP1-108, REP1-091, REP1-115, REP1-119, REP1-121, REP1-122, REP1-131, REP1-132	Robert Brewer, Theresa Brewer, Michael Campbell, Paul Hathaway, John Morris, Joanne Mawditt, Ruth Abrahams, Allyson Julie Sorrell, Martin Robert Sorrell, Carl Anton John Koenen, Philip John Heard	Site Selection - Brownfield Land and Rooftop Solar	Comment that large production sites should be sited in the appropriate locations. Small sites intended to serve the local community and supply them with cheaper electricity, will be restricted on what is available nearby. Comment that the Proposed Development does not conform with National Planning Policy which states that brownfield land should be prioritised, in line with NPS EN-3 so that these industrial categories of land are used rather than BMV and quality productive farmland. The Applicant misrepresents National Policy Statements EN-1 and EN-3. The statement that a search was done within 15km radius of the possible but currently non-existent Navenby substation does not meet the criteria for a proper search for a suitable alternative site since there is no compelling reason to have restricted it so narrowly. Comment that solar should be on rooftops and brownfield sites.	The Applicant has responded to comments relating to Site Selection in detail within Table 7-12 of the **Applicant's Response to Relevant Representations [REP1-047]**. The Applicant recognises that the use of brownfield land (alongside other locations for solar development), has an important role to play in decarbonisation. However, on their own, smaller scale solar schemes, including on brownfield land, are not likely to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. The Government recognises in the overarching NPS for Energy (NPS EN-1) that growth in large-scale solar schemes, alongside smaller schemes of solar or other renewable energy sources, is expected to improve the dependability of those assets as a combined portfolio, contributing to an adequate and dependable UK generation mix required to meet the UK's energy security needs, and the decarbonisation needs of the UK. Whilst brownfield solar and other smaller scale energy schemes are likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection locations, such as the area local to the Proposed Development, in line with NPS EN-1. Paragraph 2.10.29 of the NPS for renewable energy infrastructure (NPS EN-3) states that while land type should not be a predominating factor in determining the suitability of the site location, preference should be given to using brownfield and non-agricultural land. As demonstrated above, these land types were identified within the area of search by checking the local authority brownfield register and drawing on local knowledge. However, no suitable areas of brownfield or non-agricultural

Ref. No.	IP Name	Theme	Summary of Members of the Public Written Representations	Applicants Response to Members of the Public Written Representations
				land at the appropriate scale were found within a viable search area of the point of connection at the proposed National Grid Substation near Navenby. A full assessment of the site selection process is provided in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**. It concludes that the location of the Proposed Development comprises a suitable site when compared with other potential alternative sites and taking into account planning and environmental constraints and operational considerations. Consultation on the Proposed Development was ongoing throughout the design process prior to submission, as detailed in the Consultation Report **[APP-023]** and Consultation Report Appendices **[APP-024]**.
REP1-096, REP1-108 REP1-111, REP1-124, REP1-134	Michael Campbell, Andrew Keeling, Councillor Marianne Overton, Marc Williams, Philip John Heard	Site Selection - Opportunistic	Comment that the applicant has not proven that the use of agricultural land is "necessary". Concern that the site was chosen opportunistically after being offered by local landowners, not through a national or policy-led site selection process. The applicant's site selection is based on a landowner(s) request, as explained by the applicant. The choice of sites on such a narrow area, 10-15km from a rather arbitrarily placed substation shows insufficient evidence of an appropriate site selection as in EN3.	With regards to the loss of agricultural land, this has been carefully considered through the site selection process (as set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**) and also through the sensitive design of the Proposed Development in order to minimise the impact on BMV land and agricultural operations. Appendix A: Site Selection Report of the Planning Statement **[AS-098]** demonstrates how the Applicant considered non BMV land before BMV land and how the Applicant assessed the site against other potential alternative sites to ensure it was the most suitable, taking into account operational requirements, national and local planning policy and planning and environmental constraints, including the consideration of the loss of BMV agricultural land. Paragraph 3.6.2 of Appendix A: Site Selection Report of the Planning Statement **[AS-098]** sets out that the availability of willing landowners is an important consideration at Stage 5 in order to assemble a site that is deliverable and meets the policy requirements in relation to compulsory acquisition. The availability of willing landowners reduces and potentially avoids the need for Compulsory Acquisition powers to be used. With this in mind, and to maximise development and efficiency, the Applicant then sought to identify a principal site in as few land ownership parcels as practically possible within the search area. Suitable landowners were approached by the Applicant to discuss inclusion of their landholdings into the potential project. As described previously, the site selection process seeks to verify the location of the Proposed Development by considering whether the site is the most suitable taking into account operational requirements, national and local planning policy and environmental constraints.
REP1-115	Carl Anton John Koenen	Site Selection – Thorpe on the Hill	The applicant has given no particular consideration to the residents of Thorpe on the Hill given the overall scale of the proposed development.	The Proposed Development seeks to avoid and mitigate impacts on the environment and sensitive receptors where possible. For Thorpe on the Hill specifically, as set out in Table 4-1 of the Design Approach Document **[APP-186]**, there were design responses received at non statutory consultation, which included the provision of additional planting, screening measures, and buffers, including on land southeast of Thorpe on the Hill to reduce visual impacts which were included as part of the Proposed Development. Also, additional buffers were provided at the Cathedral View Holiday Park and on land southeast of Thorpe on the Hill to reduce noise and visual impacts. Furthermore, following statutory consultation, solar PV was removed from a field to the south east of Thorpe on the Hill and instead will be used for landscaping and biodiversity use as shown on the Works Plans **[AS-105]**.

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REP1-111, REP1-117	Andrew Keeling, Anthony Magri	Assessment of Alternatives	Concern regarding the fact that no alternatives were considered prior to the Site selection. Comment as to whether sites were considered nationally.	Chapter 4 Alternatives and Design Evolution of the ES **[APP-029]** sets out the alternatives considered, as follows: • Consideration of a 'no development' scenario as an alternative to the Proposed Development, however this was not considered a reasonable alternative to the Proposed Development as it would not deliver the renewable electricity generation capacity or storage proposed. • Other generation schemes, such as wind power, nuclear, coal, or gas fired power stations, however these were not assessed given their unsuitability at the Site (in the case of a large-scale wind project and nuclear energy) or their inability to contribute to the UK's need for low carbon electricity (in the case of coal or gas). • A smaller scheme, although this would not deliver the same generation capacity or energy security and climate change benefit as the Proposed Development and, as such, would not represent a reasonable alternative. • Site selection, which is explained in Appendix A: Site Selection Report of the Planning Statement **[AS-098]**, • Alternative solar technologies, e.g solar panel and arrangement of BESS. • Alternative site layouts, which evolved iteratively taking into consideration the outcomes of environmental assessment, the Design Vision and Design Principles, the functionality of the Proposed Development, and feedback from stakeholders during both the non-statutory and the statutory consultation process. • Alternative cable corridors. • Alternatives put forward at the statutory consultation. In terms of site selection, as described previously, the site selection process seeks to verify the location of the Proposed Development by considering whether the site is the most suitable taking into account operational requirements, national and local planning policy and environmental constraints. As stated in paragraph 2.3.1 of Appendix A: Site Selection Report of the Planning Statement **[AS-098]**, the Applicant was approached by a group of landowners who were willing to provide land north of the A46 at Morton Manor and Housham Grange, which comprises a large area of contiguous land, for the purposes of a nationally significant infrastructure project related to solar energy generation. Following a review of available capacity in the transmission network the Applicant identified a line in and line out connection into the 400kV Overhead Line close to Whisby Hall. A desk top review of the site to consider planning and environmental constraints, concluded that the site was viable, and accordingly, a formal application was made to National Grid for a connection into the 400kV Overhead Line. However, National Grid informed the Applicant that this point of connection (POC) was not available and instead the Applicant was offered and subsequently secured a POC at the proposed National Grid substation near Navenby, which was a location capable of serving multiple customers, including the Applicant.
REP1-112, REP1-134	Alistair King, Marc Williams	Alternative Sources of	Comment that offshore wind and small modular nuclear reactors (SMRs) should be prioritised.	Solar forms an important part of a diverse portfolio of energy generating facilities that are required in the UK; which is recognised in NPS EN-1.

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		Energy Production	Comparing the Proposed Development with currently available Small Modular Reactors which produce 300 MW at a 90% capacity factor, thereby producing 2,365,200 MWh of energy per year on approximately 40 acres of land. This would power 21,900 homes per acre of land used - throughout the year compared to 110 homes per acre for solar.	Solar power is cheaper to install per MW than both offshore wind and nuclear power, and the average panel still retains 80% of its efficiency after 20 years. Additionally, the Proposed Development will be re-powered throughout its lifetime to ensure consistent generation. Furthermore, by co-locating BESS with solar PV, the benefits of the renewable energy generated by the Proposed Development are maximised. BESS enables time-shifting of solar output, absorbing energy when generation exceeds demand and discharging it during system peaks in demand. This reduces curtailment, increases utilisation of solar capacity, and can provide ancillary services to the power grid. Further information is provided in the Statement of Need **[APP-184]**.
REP1-124, REP1-125,	Councillor Marianne Overton, Charles Peter Overton,	Alternative – Land at Hykeham	There is a clear and credible alternative. Land at Hykeham — located close to the National Grid — offers a far more appropriate site should the project proceed at all. This land is already industrial or allocated for development and would significantly reduce environmental harm, visual intrusion, and the permanent loss of productive farmland.	Appendix A: Site Selection Report of the Planning Statement **[AS-098]** outlines how opportunities for solar arrays on brownfield or previously developed land (PDL) were considered and accordingly local authority brownfield land registers were consulted to identify the opportunities to utilise PDL. Although it is not clear exactly where the land in Hykeham referred to in the representation is located, there is no land at Hykeham identified on North Kesteven District Council's or the City of Lincoln's brownfield land registers, and therefore no sites were considered in this location. As set out in Appendix A: Site Selection Report of the Planning Statement **[AS-098]** an assessment of brownfield land within the area of search was undertaken including land within the boundaries of NKDC, South Kesteven District Council, East Lindsey District Council, West Lindsey District Council and the City of Lincoln Council. Sites smaller than 1ha were discounted due to their inability to provide a viable land parcel of 40ha (99 acres), either individually or when combined with other brownfield sites. The Applicant identified 40ha (99 acres) as this is the size that would constitute one circuit at the chosen Medium Voltage of 33kV for the Proposed Development which would avoid the need for splitting circuits between smaller parcels involving a higher environmental impact for more interconnecting cables and avoids the need for more third party land. Of the sites over 1ha in size, none of the sites were large enough to provide a viable land parcel of at least 40ha (99 acres), therefore no individual brownfield site from the register provided an adequate area to facilitate a large-scale solar project over 50 MW. Furthermore, two of the three sites have planning permission for residential development or for residential/mixed use development. Table 5-1 of Appendix A: Site Selection Report of the Planning Statement **[AS-098]** details these sites and Figure 7 shows these sites on a plan. The search of PDL identified no land of sufficient size to facilitate a large-scale solar project either individually or in combination with other sites. In conclusion, no suitable areas of brownfield or non-agricultural land at the appropriate scale were found within a viable search area of the point of connection at the proposed National Grid Substation near Navenby.
REP1-135	Mark Wheater	Alternative - Proposed at Statutory Consultation	An alternative scheme was proposed in APP-029 Environmental Statement, section 4.9 Alternatives Proposed at Statutory Consultation. The applicant rejected the proposal on four grounds however, I respectfully do not agree with the	The alternative layout considered in APP-029 would have reduced the solar capacity in this part of the Site from 175MW to 90MW. The 130MW is if bird mitigation land were omitted in this part of the Site, but this would have then also led to likely significant effects on ground nesting birds, which the Applicant has sought to avoid. It is therefore a change of 85MW, which would have led to a

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			developer's reasons for rejecting the alternative site. I have set out the reasons for this below: 1) The area would result in a reduction of 175MW to 130MW. This reduction can be made up elsewhere within the wider DCO site away from residential houses and be made up from the overplanting ratio of 1.59. 2) The alternative layout does not align with the design vision which is to maximise renewable energy generation across the site. This in my view isn't a design vision in accordance with good design principles in the NPS. A design vision would be to deliver a sustainable scheme which fits into local landscape and is integrated with the local community and which can be valued by all. 3) Some of the solar development area (small area) is outside the DCO and therefore could not be delivered. At the time of consultation, the boundary should not have been finalised before representations were considered and CPO powers exist to secure additional land, therefore this should not have been a reason to reject the proposal. The area concerned is only a small section of land when compared to the wider site. 4) Access from A46. The principle in the alternative scheme was to avoid traffic coming through the village and this could be achieved on the same basis as the applicant's latest scheme and therefore doesn't need to be on the A46 as shown in my alternative design but, could use the access points proposed by the applicant in this application (AS-025 Site Access Location Plan Rev 2 Operational access 0-002) See plan below . My plan would therefore need to be amended to reflect this.	missed opportunity to deliver the renewable energy that maximises the grid connection offer. The design vision is presented in Section 3.8 of the Design Approach Document **[APP-186]**: "To seek to maximise the renewable energy generation across the site for the agreed export capacity with National Grid Electricity Transmission, whilst aligning with national planning policy and aiming to minimise environmental effects, supporting the delivery of the Government's objectives and commitments for the development of a secure, reliable, and affordable supply of energy while also meeting decarbonisation targets." The Applicant disagrees that maximising renewable energy cannot form part of the design vision for the Proposed Development. The Applicant is keen to deliver a solar farm where the landowners are willing participants. The Applicant is under a duty to only use compulsory acquisition powers where it is necessary, justifiable and as a last resort, and therefore did not consider the suggested land outside the Order limits. In addition, the additional land suggested was located to the south east of Thorpe on the Hill, and following feedback received during the statutory consultation, the Applicant removed solar PV panels from a field to the south east of Thorpe on the Hill which instead will be used for landscaping and biodiversity use as shown on the Works Plans **[AS-105]**. Providing solar PV panels in this location would therefore have been contrary to the design evolution of the Proposed Development. The suggestion to use the access point directly off the A46 included in the DCO Application is noted, however this was discounted following liaison with National Highways for the reasons set out in paras 4.9.4 to 4.9.7 of Chapter 4 of the ES: Alternatives and Design Evolution **[APP-029].**
Climate				
REP1-108	Philip John Heard	GHG Assessment	The Applicant has not adopted the worst case 'Rochdale Envelope' in assessing GHG emissions from the manufacture of solar PV Panels. If similar data to that for the proposed Springwell Solar Development were used, the projected emissions would be a magnitude of 3 times greater. This has resulted in a lower predicted carbon intensity figure than reality; the carbon intensity figure is even higher if there is no justification for exceeding a 40 year time consent. Based on the Secretary of State's remarks, the Applicant's GHG comparison with an OCGT is inappropriate.	The Rochdale Envelope approach has been adopted for environmental assessment, as set out in Chapter 5: Environmental Impact Assessment Methodology of the ES **[APP-030]**. The Rochdale Envelope provides a framework for assessing the maximum (and where relevant, minimum) parameters, including the limits of deviation (e.g. development extents or specific maximum heights) as relevant, for the Proposed Development where flexibility needs to be retained. This approach also ensures that the worst-case scenario is assessed. The result is that the impacts of the Proposed Development will only be equal to or less than those concluded in the assessments of the ES. Chapter 6: Climate Change **[REP1-017]** presents a comparison against an Open Cycle Gas Turbine for informative purposes because this technology was used to top-up the grid during times of peak demand in a way that battery technology has since largely replaced. Paragraph 6.4.78 of this chapter explains: "These figures are inevitably subject to a degree of uncertainty, but they illustrate the fact that the use of battery energy storage, when used for grid balancing purposes, is likely to result in significant additional carbon savings over its operational lifetime. These additional carbon savings from use of battery energy storage for grid balancing are

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				not factored into the overall GHG assessment, which therefore represents a conservative, worst-case scenario". The comparison is therefore for information only and is not used in the calculations on which the assessment is based. It therefore does not affect the conclusions of the ES.
REP1-108	Philip John Heard	GHG Emissions	APP-031 (Chapter 6) gives 2 different figures for construction GHG emissions (229,637 tCO2e stated in Para 6.4.49 and 280,682 tCO2e stated in Table 6-8) and 2 different figures for emissions from component replacements (477,829 tCO2e stated in Para 6.4.55 and 472.234 tCO2e stated in Table 6-10); could the Applicant please state which are correct.	The latest version of this chapter is REP1-017. The figures quoted in Table 6-8 and Table 6-10 are correct. This does not affect the conclusions of the assessment, which have been based on the numbers presented in these tables.
Landscape and Visual				
REP1-092, REP1-093, REP1-096, REP1-105, REP1-124, REP1-125, REP1-126, REP1-127, REP1-131, REP1-132, REP1-134, REP1-135,	Robert Brewer, Theresa Brewer, Michael Campbell, Paul Hathaway, Councillor Marianne Overton, Charles Peter Overton, Mrs Diane Plumb, Helen Nunziatina Joan Powell, Allyson Julie Sorrell, Martin Robert Sorrell, Marc Williams, Mark Wheater	Visual Impact of the Proposed Development	The effect of the industrialisation of the landscape, in such a quiet rural and agricultural area will be cause great harm to the residents, as well as affecting visitors, tourists and the local economy.	The Applicant has responded to comments regarding visual impact of the Proposed Development in detail within Table 7-4 on Page 260 of the **Applicant's Response to Relevant Representations [REP1-047].** With regards to the impact of the Proposed Development on visitors, tourists and the local economy, Chapter 12 Socio-economics and Land use of the ES **[AS-016]** includes an assessment of potential effects on tourism/recreation arising from the Proposed Development (ref. Section 12.7) comprising consideration of impacts on local accommodation facilities, recreational receptors and visitor attractions. Section 12.5 identifies the size of the visitor economy and recognises that the villages of Coleby, Bassingham, Navenby and Aubourn contain visitor and recreational attractions, and that there is also a network of Public Rights of Way (PRoWs) in the surrounding area which may be used by visitors. With due consideration given to other assessment findings set out in Chapter 10: Landscape and Visual Amenity **[AS-117]**, Chapter 11: Noise and Vibration **[APP-036]**, Chapter 13: Traffic and Transport **[APP-APP-038]** and Chapter 14: Other Environmental Topics (Section 14.2: Air Quality) **[APP-039]** as appropriate, the assessment in Section 12.7 concludes that overall the impact of the Proposed Development on tourism/recreation receptors is not significant during the construction/ decommissioning and operational phases. In respect of views from/for these receptors specifically, a Framework LEMP **[REP1-039]** has been prepared to accompany the DCO application to provide visual mitigation. Section 12.7 of Chapter 12 Socio-economics and Land use of the ES **[AS-016]** also includes an assessment of potential effects on businesses arising from the Proposed Development. Taking into account the assessment findings presented in the ES Chapters set out above this assessment concludes that there would be no significant effect on local businesses during the construction/ decommissioning and operational phases.
REP1-115, REP1-117	Anthony Magri, Carl Anton John Koenen	Landscape Impact on Thorpe on the Hill	The Landscape and Visual impact of this development on Thorpe on the Hill parish would be enormous - greater than that for any of the other villages impacted by the proposal. Screening will have little bearing on this as the hilltop location means that from many vantage points we will look over the screening and down onto the panels. Has Fosse Green Energy fully considered the effect on the character and appearance of the development on Thorpe on the Hill? What further mitigation	The Applicant acknowledges that there will be some landscape and visual effects as a result of the Proposed Development. Receptors will be most impacted during the construction phase, and the number of significant effects will drop by half at Year 1 of operation. The significant effects will further reduce as the mitigation planting will be established by Year 15 (a chosen year of assessment to align with industry practices), replacing the vegetation lost at the construction phase, enhancing landscape pattern, and helping integrate the Proposed Development within the surrounding landscape. Specifically, residents of Thorpe on the Hill and

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			could be offered bearing in mind the comments above about screening? Concern there is a disproportionate land use within Thorpe on the Hill	Bassingham will experience moderate adverse effects during construction, but are not expected to experience any adverse effects during operation of the Proposed Development. It should be noted that the Applicant has sought to further minimise the visual impact of the Proposed Development upon residential receptors in close proximity to the Proposed Development. Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** concludes that the Proposed Development will have a moderate adverse (significant) impact during construction (in winter), reducing to a minor adverse (not significant) impact by Year 1 of operation (in winter), a minor adverse (not significant) impact by Year 15 of operation (in winter) and a negligible adverse (not significant) impact by Year 15 of operation (in summer) on the residents of Thorpe on the Hill. The Framework LEMP **[REP1-039]** outlines the landscape and ecology impact avoidance measures that would be implemented prior to, and during, construction of the Proposed Development, as well as the habitat restoration, enhancement, management and monitoring measures to be implemented once the Proposed Development is operational. When making a decision on the DCO Application, the Secretary of State will need to balance these impacts against the urgent need and critical national priority for the Proposed Development as set out in the energy NPSs. Changes to the design have been made in the vicinity of Thorpe on the Hill in response to feedback received from Thorpe on the Hill Parish Council and local residents during statutory consultation to reduce the impact of the Proposed Development. This has included the removal of solar PV within the field south-east of Thorpe on the Hill, which is now an area of managed arable fields for bird mitigation purposes (i.e. no solar infrastructure proposed), to increase the distance from the village to the Proposed Development itself, and providing additional vegetation screening along Fosse Lane. As such, the Proposed Development design provides a 300m buffer between the proposed solar infrastructure and residential receptors in Thorpe on the Hill. See Figure 3-2A of the ES **[AS-022]** and the Framework LEMP **[REP1-039]** for details. The Design Approach Document **[APP-186]** provides further details of all the design changes made in response to responses made to non-statutory and statutory consultation, the outcomes of environmental assessment and national and local planning policy.
REP1-112	Alistair King	Landscape and Visual assessment methodology	Concern regarding the assessment of Landscape and Visual Effects. The use of a very precise methodology for LVIA assessment gives the impression that the results are precise. It leads to both the authors and readers believing that they have a more accurate assessment of harms than they actually have. The applicant has selected a very limited number of viewpoints (35 within or adjacent to the site and 9 within the Zone of Theoretical Visibility) despite the extensive scale of publicly accessible land, roads and footpaths across the area. Given that many hundreds of miles of these routes may have views of the proposed infrastructure, the chosen viewpoints equate to roughly one per tens of miles and cannot reasonably represent the range of impacts. This approach gives a misleading	The assessment of landscape and visual effects has been carried out in accordance with industry methodology – as explained in Chapter 10 Landscape and Visual Amenity **[AS-117]**, and agreed with LCC and NKDC. The viewpoints which have been assessed were also agreed with the host councils and are considered representative of groups of receptors. The approach to defining the LVIA study area has been described within Appendix 10-B: Landscape and Visual Impact Assessment Methodology **[APP-149]** of this ES. This has also included the consideration of longer distance views, details of which are provided in Appendix 10-G Landscape and Visual Amenity Study Area Analysis **[APP-154]** of this ES. Figure 10-9 Scoping Viewpoint Locations of the ES **[APP-096]** illustrates the location of selected viewpoints.

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			impression of precision and does not provide a comprehensive basis for assessing harm to views. Concerns of subjectivity bias – example 1: Viewpoint 22 analysed in Table 38 of Appendix 10-F - The 'Visual Susceptibility' is judged Medium and 'Value of Views' judged Medium. The 'Visual Sensitivity' is determined as a combination of these and judged as Medium. This is the main (and only) public footpath to the west of Bassingham out to and over the River Witham. Immediately after exiting the enclosed part of the path between properties the walker enters onto the elevated footbridge. It is the first vista of open countryside after leaving the town, and the combination of river and green fields is a delight. The Susceptibility, Value and Visual Sensitivity of this view should be High. The applicant analysis defines the Operation Year 1 Winter as Medium and Years 15 Summer and Winter as Low. The methodology then interprets year 15 'Level of Effect and Significance' as 'Minor Adverse' – interpreted as insignificant therefore not counting as a harm. No amount of mitigation would improve the views of acres of panels which were once open fields. Where hedges are used, they will not hide the panels from the elevated position on the bridge, and will adversely affect the character of the ongoing walk, including the option heading north by turning the open aspect into viewless tunnels. Walkers would judge this as highly adverse and very significant. The continuing 'Level of Effect and Significance' should be 'Major (Significant)'. Example 2: Viewpoint 7 (Figure 10-7) - This is analysed in: Table 51: Users of Fosse Lane, Haddington Labe and the A46 overbridge **[EN010154-000494-6.3 ES Appendix 10-F Visual Assessment Table 51]**. (note that the applicants' photos just show two views south west directly along the line of the A46 - see two images below giving the north and north westerly view) The Visual Susceptibility, Value of Views and Visual Sensitivity are judged Medium. This road leads up and over the A46 and for travellers heading north this is the first sight of Thorpe on the Hill and the surrounding high ground to the north and north west. As such it is a very pleasant vista, fostering anticipation of the open countryside to follow. The Susceptibility, Value and Visual Sensitivity of this view should be High. The applicant analysis further defines the Operation Year 1 Winter as Low and Years 15 Summer and Winter as Low, and thus year 15 'Level of Effect and Significance' as 'Minor Adverse' – interpreted as insignificant and not counting as a harm Example 3: viewpoint 4 (View south-west from PRoW TOTH/6/1) **[EN010154- 000183-6.2 Fig 10-7]** This is analysed in: Table 32: Recreational users of PRoW TOTH/6/1 and	The scope of visual receptors and representative viewpoints was agreed with AAH Consultants on behalf of North Kesteven District Council and Lincolnshire County Council after extensive consultation, as detailed within Table 10-3 of Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. It was agreed that it was proportionate for the scope of photomontages to be primarily focussed on those viewpoints representative of people that are likely to experience significant effects at year 15, although photomontages previously prepared at PEIR stage have also been updated to demonstrate how the design has evolved. With reference to Figure 10-7: Zone of Theoretical Visibility - Barrier Earth with Viewpoint Locations **[AS-059]** the agreed scope of photomontages included Viewpoints 3, 11, 17, 22, 27, 29, 30, 32, 33, 34, and 35. In terms of the photomontage type with reference to LI TGN 06/19, it was agreed to prepare Type 3/4 photomontages at year 1 winter, year 15 winter and year 15 summer for the large majority of these. The exceptions being for Viewpoints 3, 22, 27 that are anticipated to not experience significant effects at year 15, and so did not warrant a year 15 summer photomontage.

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			TOTH/6A/1 **[EN010154-000494-6.3 ES Appendix 10-F Visual Assessment Table 51]**. The Visual Susceptibility, Value of Views and Visual Sensitivity is judged Medium. The applicant states: "The views are experienced by recreational users of Public Rights of Way, where appreciation of the view is unlikely to be the primary interest, as such the susceptibility is Medium". This is part of the popular 'Stepping Out' path network and its key feature is the stunning views and open character of the area. The Stepping Out leaflet describes the area as having '… lovely views back to the village'. What is more, this kind of higher landscape is quite rare in the area and thus highly valued. For this reason, the applicants' initial assessments of Medium should be High. The year 15 assessments of 'Minor adverse' (insignificant) is wrong by any reasonable judgment. Furthermore, the planned mitigation for this area, i.e. tall hedgerows to screen the panels, will have i) limited effect due to undulation of the land, and ii) create a 'tunnelling' effect on paths thus destroying the open views that are a key feature of the area, and why it is so popular as a 'stepping out' route.	
REP1-112	Alistair King	Underestimation of people affected (Landscape and visual)	The assessment takes insufficient account of the number of people affected by the landscape harm in general, or at the specific viewpoints. There are more than 10,000 people directly affected in the immediate vicinity, then tens of thousands more visitors and people travelling through the region.	The assessment of landscape and visual effects has been carried out in accordance with industry methodology – as explained in Chapter 10 Landscape and Visual Amenity **[AS-117]**, and agreed with LCC and NKDC. The viewpoints which have been assessed were also agreed with the host councils and are considered representative of groups of receptors.
REP1-106, REP1-108	Philip John Heard, Anne Heard	Landscape and Visual Effects - Hedgerows	Comment regarding the potential impacts of the Proposed Development on tourism, landscape character and vegetation management. The comment raises concern that the proximity of the development to the Lancaster Bomber statue near Norton Disney could deter visitors and harm local tourism due to the perceived industrialisation of the surrounding landscape. It challenges the Applicant's conclusion that landscape and visual effects attract only moderate negative weight, noting acknowledged long-term moderate to major adverse effects and highlighting cumulative impacts from multiple nearby solar, BESS and substation schemes within a circa 15 km radius. The comment also questions the proposed landscape strategy, arguing that extensive new hedgerows and tall planting would fundamentally alter the traditionally open character of the landscape. Finally, it highlights a lack of clarity and consistency in the documentation regarding hedgerow removal, noting that almost 2 km of hedgerow is proposed to be removed for access, which is considered disproportionate and inadequately explained.	Paragraph 12.7.28 of Chapter 12 Socio Economics and Land Use **[AS-016]** provides an assessment of tourism effects and concludes there will be no significant effects on local tourism activities/venues. Chapter 10 Landscape and Visual Amenity **[AS-117]** considers visual impacts on Norton Disney, which are considered to be negligible due to the distance and screening. The Lancaster Bomber statute is not specifically assessed in either chapter because it is 3.5km from the Proposed Development and therefore outside of the Study Area and Area of Influence within which it is considered that the Proposed Development could have an effect. There is also woodland screening between the Order limits and the statue, which further minimises any potential effect. It is not considered there would be likely significant effects on the Lancaster Bomber statue setting or tourism associated with the statue. With regards to the moderate negative weight attributed to landscape and visual effects, it is the Secretary of State who will determine the planning weight. Chapter 10 Landscape and Visual Amenity **[AS-117]** provides an assessment of impacts at each viewpoint attributed to the Proposed Development and along with other cumulative schemes in the area. Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** notes at paragraphs 10.10.8-10.10.38 that significant cumulative landscape and visual effects are only anticipated during the construction of the Proposed Development in

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				addition to the North Hykeham Relief Road, Springwell Energy Farm and Leoda Solar Farm. By operation once the landscape mitigation of each scheme has established, it is judged that there would be no significant cumulative landscape and visual effects, including from other large scale solar farm developments, such that the predominantly agricultural land use will remain a defining characteristic of the landscape character areas identified within the published character assessments. The landscaping strategy includes allowing some hedges to grow and the planting and infilling of other hedges. This is considered in keeping with the landscape and will have beneficial ecological effects, but it is acknowledged would change the nature of views in some places. ES Figure 3-17 Maximum Vegetation Removal Plan **[AS-029]** illustrates the maximum extent of vegetation removal to construct the Proposed Development. Paragraph 3.2.2 of the Biodiversity Net Gain Report **[APP-194]** clarifies that "A total of 3.48 km of hedgerow habitat will be lost as a result of the Proposed Development. A further 14.20 km of hedgerows will be retained in their current condition. Enhancement works are proposed for 50.38 km of hedgerow habitat, while 19.16 km of new hedgerow habitat will be created."
REP1-106	Anne Heard	Landscape and Visual Cumulative Effects	The Applicant has commented on the cumulative effects of the proposed development and each of the other developments in turn, they have not considered all of these developments together which would have a greater impact in visual and landscape terms. The Applicant has understated the visual and landscape impacts of the proposed development on the Limestone Heath. Even after the mitigation planting has matured, the impact of the 15m high transformers of the Navenby substation and other BESS infrastructure all clustered in this area will still be visible and permanently change the character of the area. The Applicant has understated the extent of the visual and landscape impacts of the proposed development in that these extend over a much larger area than the Limestone Heath. The impact will affect the lives of thousands of residents and many communities from Thorpe on the Hill in the north to Scopwick in the east, Leadenham in the south and Norton Disney in the west. Travelling across the landscape these developments will be visible and change the nature of the arable landscape to an industrialised area.	Regarding the cumulative landscape and visual impact, as summarised in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]** (ref. paragraph 15.5.24), significant adverse cumulative effects are identified on landscape and visual amenity receptors, however the significance of effect attributed to the Proposed Development alone is not increased when considering these other developments alongside the Proposed Development, as reported in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The following significant cumulative effects were established during construction, where the magnitude of effect is higher than that of the Proposed Development in isolation. During construction: • Major Adverse (significant) landscape cumulative effects upon the North Kesteven District landscape sub-area Witham and Brant Vales due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction. Additionally, changes are anticipated to the visual amenity of users of the Viking Way (PRoW Cole/2/1 and BooG/2/2) as a result of the Proposed Development together with ID95 Application Reference: PL/0087/23, North Hykeham Relief Road, resulting in a Major adverse effect which is significant. • Moderate Adverse (significant) landscape cumulative effects on the North Kesteven landscape sub-area Limestone Heath due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction as a result of the Proposed Development together with ID63 Application Reference: EN010149, Springwell Energy Farm and ID103 Application Reference: EN0110016, Leoda Solar Farm, resulting in a Moderate adverse effect which is significant. During operation (year 15) it is considered there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development.

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				The potential for significant cumulative landscape and visual effects of other NSIP scale solar schemes at greater distances from the Proposed Development has also been considered within the Joint Interrelationship Reports prepared for the respective examinations of such schemes, including, Springwell Solar Farm **[EN10149]**, Tillbridge Solar Project **[EN010142]**, West Burton Solar Project **[EN010132]**, and Cottam Solar Project **[EN010133]**. These Reports found that, given the notable distances and lack of intervisibility between these schemes and the Proposed Development, there was no potential for significant cumulative effects. With regard to impacts on residents of nearby villages, the Applicant has assessed these in accordance with industry guidance, principally the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3), within Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The visual amenity of residents living in Thorpe on the Hill and Norton Disney is predicted to experience non-significant residual effects due to the provision of offsets between the edge of solar PV infrastructure within the Principal Site and the settlement edge, together with the introduction of new planting along field boundaries. The visual amenity of residents living in Leadenham and Scopwick are also predicted to experience non-significant residual effects due to them being located over 2km from the cable corridor, and the cable being buried and comprising no above ground infrastructure.
Socio-Economics and Land Use				
REP1-093,REP1-106, REP1-121, REP1-126, REP1-127, REP1-131, REP1-132,	Theresa Brewer, Joanne Mawditt, Mrs Diane Plumb, Helen Nunziatina Joan Powell, Allyson Julie Sorrell, Martin Robert Sorrell, Anne Heard	Food Security	Food Security is supposed to be an important priority for the nation, and part of achieving net zero, so it should be part of the balance in refusing this project.	The Applicant recognises that there are concerns relating to the potential for the Proposed Development to impact upon food production. It is important to place the scale and nature of land use into context. As considered in Chapter 12: Socio-Economics and Land Use **[AS-016]**, the total land area required for the Proposed Development represents approximately 0.09% of the total farmland within the East Midlands, and therefore constitutes a very small proportion of the regional agricultural resource. Furthermore, research undertaken by the Applicant in 2024 indicates approximately 50% of the land within the proposed Principal Site is currently used for the cultivation of non-food crops. Of this, the majority (approximately 81%) is grown for use as fuels for carbon-intensive energy sources, rather than for direct human or animal consumption. As such, while the land is agricultural in character, its current use does not solely support food production. The Proposed Development would therefore result in a limited and proportionate change in land use, set against the wider regional context and the Proposed Development's contribution to cleaner energy generation. It should be noted that the Order Limits include a significant portion of retained arable land (a minimum of 181ha (447.3 acres) of retained arable land is secured via the Framework LEMP **[REP1-039]**, a detailed version of which is to be developed substantially in accordance with the framework plan, as secured under Requirement 8 of the Draft DCO **[REP1-007]**), which allows current farming practices to continue whilst also providing other benefits, such as mitigation for ground nesting birds. This retained arable land includes approximately 116ha (286.6 acres) of Subgrade 3a BMV agricultural land.

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REP1-106	Anne Heard	Loss of BMV land	The IEMA guidelines sets out that the permanent sealing above 20ha of agricultural land is of a high impact magnitude and in the case of BMV land gives rise to a major impact which is significant in terms of the EIA. The total amount of agricultural land which will be permanently lost is not the 4.6 ha stated by the Applicant but at least 20.43 ha comprising solar station compounds, swales, BESS compound, onsite substation, access points and internal tracks in addition to the areas of planting and habitat creation.	There is not 20 ha or more land permanently sealed by the Proposed Development. The 4.6 ha referred to relates to land assessed as permanently lost in Chapter 12: Socio-Economics and Land Use **[AS-016]**. This is because it is proposed planting that does not need to be removed to decommission the Proposed Development and would therefore likely be left in place when the Applicant exits the site. The landowners would be able to still revert this 4.6 ha back to arable farmland after the Proposed Development if they choose. The remainder of the Proposed Development will be removed during decommissioning, and therefore is not permanent. The **Draft DCO [REP1-007]** provides for a 60 year lifetime in operation before decommissioning is required to ensure these effects are not permanent. The Applicant does acknowledge however that the operational effects are long term and reversible. The Solar Stations, BESS Compound, and Onsite Substation will include some areas of concrete pads, therefore sealing the ground, within gravel compounds. The swales and access tracks will be crushed stone or gravel and therefore still able to drain, and not sealed as such. This infrastructure will all be removed during decommissioning and are therefore not permanent. With regards to concreted areas, the Framework DEMP **[REP1-035]** notes (ref. paragraph 1.1.4) that decommissioning works will include the process of removing all solar PV array infrastructure including modules, mounting structures, cabling inverters and transformers and concrete foundations to those elements. This would be done in line with the measures outlined in the Framework SMP **[AS-100]**. The provision of a detailed DEMP and detailed SMP, which would be substantially in accordance with the relevant frameworks, is secured via Requirements 20 and 15 of the Draft DCO **[REP1-007]** respectively.
REP1-091, REP1-121, REP1-124, REP1-125, REP1-127, REP1-131, REP1-132	Ruth Abrahams, Joanne Mawditt, Councillor Marianne Overton, Charles Peter Overton, Helen Nunziatina Joan Powell, Allyson Julie Sorrell, Martin Robert Sorrell,	Loss of Productive Farmland	Losing productive farmland is a mistake and it will mean fewer farming jobs with a knock on effect on all sorts of agricultural services.	As noted in Chapter 12: Socio-Economics and Land Use **[AS-016]** paragraph 12.7.52, it has been confirmed by all landowners that no job losses are expected as a result of the removal of agricultural land. It is expected that when the rent revenues from the land start, there will be additional jobs created on their farms offsite as landowners diversify their land further with the underlying financial stability of the rental income.
REP1-099, REP1-100, REP1-124, REP1-125, REP1-127, REP1-131, REP1-132	Andrew Cronin, Lisa Cronin, Councillor Marianne Overton, Charles Peter Overton, Helen Nunziatina Joan Powell, Allyson Julie Sorrell, Martin Robert Sorrell	Impact on the Local Economy	Given the rural location and the proximity of historic Lincoln there are a lot of tourist dependent businesses which will suffer if the area undergoes this kind of massive industrialisation. Not just hotels/B&Bs/campsites/restaurants/pubs/cafes/museums and other visitor attractions but also fuel stations, small shops and traders at markets will all see income decline as visitors go elsewhere to enjoy unspoilt landscapes.	Chapter 12 Socio-economics and Land use of the ES **[AS-016]** includes an assessment of potential effects on tourism/recreation arising from the Proposed Development (ref. Section 12.7) comprising consideration of impacts on local accommodation facilities, recreational receptors and visitor attractions. Section 12.5 identifies the size of the visitor economy and recognises that the villages of Coleby, Bassingham, Navenby and Aubourn contain visitor and recreational attractions, and that there is also a network of Public Rights of Way (PRoWs) in the surrounding area which may be used by visitors. With due consideration given to

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				other assessment findings set out in Chapter 10: Landscape and Visual Amenity **[AS-117]**, Chapter 11: Noise and Vibration **[APP-036]**, Chapter 13: Traffic and Transport **[APP-APP-038]** and Chapter 14: Other Environmental Topics (Section 14.2: Air Quality) **[APP-039]** as appropriate, the assessment in Section 12.7 concludes that overall the impact of the Proposed Development on tourism/recreation receptors is not significant during the construction/ decommissioning and operational phases. In respect of views from/for these receptors specifically, a Framework LEMP **[REP1-039]** has been prepared to accompany the DCO application to provide visual mitigation. Section 12.7 of Chapter 12 Socio-economics and Land use of the ES **[AS-016]** also includes an assessment of potential effects on businesses arising from the Proposed Development. Taking into account the assessment findings presented in the ES Chapters set out above this assessment concludes that there would be no significant effect on local businesses during the construction/ decommissioning and operational phases
REP1-096, REP1-106 REP1-108	Michael Campbell, Philip John Heard, Anne Heard	Restoration of Land to former State	Claims that land is "temporary use" are rejected; land will not realistically return to food production. Negative impacts on agricultural employment and supply chains. The Applicant "will ensure that the ALC grades will be unaltered …" Exactly how will the Applicant ensure this? Developments of this timescale on land to be returned to its previous quality are not proven in this respect; the Applicant has provided no evidence to the contrary. Soil compaction may take years to recover or could even be permanent. The report by ADAS dated March 2023 "The impact of solar photovoltaic (PV) sites on agricultural soils and land" notes that a key residual impact on land is soil compaction, that at the point of decommissioning there is likely to be residual compaction within the soil	The Applicant is applying for a 60-year operational period for the Proposed Development, which is secured under Requirement 20 of the Draft DCO **[REP1-007]**, which provides that decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational lifetime of the Proposed Development, it will be decommissioned in line with the controls set out within the Framework DEMP **[REP1-035]** (the provision of a detailed DEMP, which is to be substantially in accordance with the framework plan, is secured under Requirement 20 of the Draft DCO **[REP1-007]**), with the land reinstated to its original condition, and returned to the landowners who would choose how the land is to be used and managed. It should be noted that the breach of any commitments under a DCO amounts to a criminal offence and the provisions and Requirements of a DCO are enforceable by the Local Planning Authority. The Framework SMP **[REP1-037]** a detailed version of which is secured via Requirement 15 of the Draft DCO **[REP1-007]**, contains industry standard good practice mitigation measures to reduce impacts on soil which will ensure that the ALC grade will be unaltered through operation and decommissioning of the Proposed Development. It should be noted that improvements in soil quality over time due to absence of intensive farming have been studied and reported. For example, research by Lancaster University[3] suggests that with good management (diverse planting, low-intensity grazing, minimal soil compaction), solar farms can boost soil-carbon storage over time.
REP1-093	Theresa Brewer	Impact of Witham Valley Country Reserve	Concerns regarding impact of the Proposed Development on the Witham Valley Country Reserve and Whisby Nature Park.	The habitat creation, biodiversity enhancement and landscaping, designed into the Proposed Development will result in an increase in the diversity of plants, birds and insects as well as other fauna, a significant improvement as compared to intensive arable agriculture. The design of the Proposed Development will link the habitat creation and increase in biodiversity into the green and blue infrastructure in the wider landscape including the Witham Valley Country Park and the Local Nature Recovery Network.

[3] Appropriate Management of Solar Farms Can Boost Soil Carbon Levels (2024) Lancaster University

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				As stated in Table 8-14 of Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]**, due to the embedded mitigation secured within the Framework CEMP **[APP-189]** (such as pollution control and dust suppression), there is expected to be no impact pathways, either directly or indirectly, that would impact upon the integrity or functioning of Whisby Nature Park LNR. The integration of soft landscaping within the design of the Proposed Development includes measures to increase connectivity across the Order Limits and in the wider ecological network, noting the opportunities to form ecological connections to Whisby LNR. The provision of a detailed CEMP, to be substantially in accordance with the framework plan, is secured via Requirement 12 of the Draft DCO **[REP1-007]**.
REP1-124, REP1-125,	Councillor Marianne Overton, Charles Peter Overton,	Reduction in countryside amenity for residents	The introduction of concrete infrastructure, wire fencing, security compounds, and artificial lighting would be visually intrusive and fundamentally alien to the rural character of the area. Furthermore, the fenced nature of the site would restrict public access and channel walkers into limited routes, depriving them of the freedom, openness, and tranquillity that define a genuine countryside experience.	The Applicant acknowledges that there will be some landscape and visual effects as a result of the Proposed Development. Land within the Order Limits does have a predominantly rural character; however, consideration of the landscape has been integral to the design of the Proposed Development. The design has sought to respect the wider landscape and the intrinsic value of the countryside and natural environment. The Design Approach Document **[APP-186]** explains the design principles that were developed at an early stage, and which provided a framework for evolution of the design of the Proposed Development. Specifically, the Design Approach Document **[APP-186]** sets out the Design Vision of the Proposed Development which is “to seek to maximise the renewable energy generation across the site for the agreed export capacity with National Grid Electricity Transmission, whilst aligning with national planning policy and aiming to minimise environmental effects, supporting the delivery of the Government’s objectives and commitments for the development of a secure, reliable, and affordable supply of energy while also meeting decarbonisation targets.” From the Design Vision, Design Principles were developed which, from the outset sought to deliver a high quality design that reflects the characteristics of the Site, takes into account the requirements of national and local policy and is informed by the outcomes of both Non-Statutory and Statutory Consultation, and environmental assessment. The Design Principles prepared for the Proposed Development establish a clear framework for delivering good design. This includes, for example, where the Principal Site layout sought to avoid siting solar PV and BESS infrastructure immediately surrounding residential dwellings and small settlements to minimise the potential for adverse impacts on visual amenity and glint and glare. The consideration of planning and environmental constraints in site selection is further explained in Appendix A: Site Selection Report of the Planning Statement **[AS-098]** and the Design Approach Document **[APP-186]** sets out how the design of the Proposed Development has evolved. It details how the design has been influenced by site selection and site context, how it has addressed the findings of the environmental assessment, how it has evolved through both Statutory and Non-Statutory Consultation, and how it aligns with the Design Vision and Principles.

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				With regards to light pollution, as secured within the Framework OEMP **[REP1-033]** (ref. LV-O3), the proposed lighting has been designed to avoid light pollution and adverse effects. The following mitigation has been embedded: • No areas of the Proposed Development will be continuously lit. • Operational lighting will be triggered by Passive Infra-red Detector (PID) systems, which will be installed around the perimeter of the Proposed Development. • Lighting will be directional with care to minimise potential for light spillage beyond the DCO Site particularly towards neighbouring properties, habitats, highways or waterways. • Lights installed will be of the minimum brightness and/or power rating capable of performing the desired function. • Light fittings will be used to reduce the amount of light emitted above the horizontal (reduce upward lighting). • The lighting of the primary substation will be motion sensor triggered, that would operate from dusk. • Low level lighting on specific operational units will be triggered by motion sensors, from dusk. • The inward facing CCTV cameras will typically use night-vision technology and will not require additional lighting. Production of a detailed OEMP, which is to be developed substantially in accordance with the Framework plan, will be secured under Requirement 13 of the Draft DCO **[REP1-007]**. The historic landscape aspects are considered within Appendix 7-E Historic Landscape Character Assessment of the ES **[APP-128]** (with the detailed assessment of the potential effects upon heritage assets presented within Appendix 7-D: Detailed Heritage Asset Setting Assessment of the ES **[APP-127]**) and the Applicant is of the opinion that a proportionate level of assessment with regard to historic landscape (and its contribution to the significance of heritage assets) was undertaken taking into account the overall significance and impacts from the Proposed Development. This assessment identified that some of the field boundaries within the Order Limits qualify as 'important' hedgerows under the archaeology and history criteria of the Hedgerows Regulations 1997. Of these, there are several areas of surviving interconnected field boundaries (and further isolated or truncated important hedgerows). The Proposed Development would be contained within the existing field boundaries (with the exception of localised removal to facilitate circulation and access where required) and would therefore have no impact on the historical integrity of historically important hedgerows of the Order Limits. As stated in the Framework CEMP **[APP-189]** (ref. CH-C2), the Proposed Development will seek to retain any hedgerows deemed 'important' under the archaeology and history criteria of the Hedgerows Regulations 1997. With regard to any localised removal of Important Historic Hedgerows (as per the Hedgerow Plan **[AS-013]** and Appendix 7-E **[APP-128]**) to facilitate construction, where hedge removal is required for visibility splays only, where practical they will be trimmed down to a height to be agreed with County Highways, most likely 0.9m, so that it is not removed altogether and can regrow after construction. Production of

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				a detailed CEMP, which is to be developed substantially in accordance with the Framework plan, will be secured under Requirements 12 of the Draft DCO **[REP1-007]**. In summary, taking into account the potential effects of the Proposed Development and mitigation to be implemented, it can be concluded that the Proposed Development would not lead to significant effects upon the historic landscape, including 'important' hedgerows, as established in Chapter 7: Cultural Heritage of the ES **[APP032]**. Assets in Thurlby (Grade II* listed Church of St Germain, Grade II Rectory and Thurlby Hall) were also assessed in detail. The assessment concluded that the Proposed Development was designed to ensure the rural experience of the assets is retained (with solar panels introduced at distance of c. 480m south of the Rectory, 590m west, 510m north-west of the Hall and 500m north-west and 360m north-east of the Church). This will result in no change to the physical fabric of the Listed Buildings, their relationship with their associated garden plots, the adjacent roads, and the fields directly surrounding their plots and the rural context of the setting of the Listed Buildings will be unaffected, resulting in no harm to the assets' significance.
REP1-124, REP1-125, REP1-096	Councillor Marianne Overton, Charles Peter Overton, Michael Campbell	Impact on Visitors and Tourism	Tourism is the second-largest local economic sector. Harm to: Walking routes and caravan parks, visitors to Commonwealth War Graves and historic church sites, the internationally recognised "Lost Village" music festival, industrialisation risks damaging the area's visitor appeal and economy.	Chapter 12: Socio-economics and Land use of the ES **[AS-016]** includes an assessment of potential effects on tourism/recreation arising from the Proposed Development (ref. Section 12.7) comprising consideration of impacts on local accommodation facilities, recreational receptors and visitor attractions. Section 12.5 identifies the size of the visitor economy and recognises that the villages of Coleby, Bassingham, Navenby and Aubourn contain visitor and recreational attractions, and that there is also a network of Public Rights of Way (PRoWs) in the surrounding area which may be used by visitors. With due consideration given to other assessment findings set out in Chapter 10: Landscape and Visual Amenity **[AS-117]**, Chapter 11: Noise and Vibration **[APP-036]**, Chapter 13: Traffic and Transport **[APP-APP-038]** and Chapter 14: Other Environmental Topics (Section 14.2: Air Quality) **[APP-039]** as appropriate, the assessment in Section 12.7 concludes that overall the impact of the Proposed Development on tourism/recreation receptors is not significant during the construction/ decommissioning and operational phases. In respect of views from/for these receptors specifically, a Framework LEMP **[REP1-039]** has been prepared to accompany the DCO application to provide visual mitigation. Section 12.7 of Chapter 12 Socio-economics and Land use of the ES **[AS-016]** also includes an assessment of potential effects on businesses arising from the Proposed Development. Taking into account the assessment findings presented in the ES Chapters set out above this assessment concludes that there would be no significant effect on local businesses during the construction/ decommissioning and operational phases.
REP1-113, REP1-114	Gordon Kobish, Sue Kobish	Conflict of Land Use	Conflict of land use around Stocking Wood area in particular. The land proposed for solar panels is already in use (and has been for some years) for intensive crop growing (239 acres (93.08 hectares) in total) for supplying the crop for the Digester located at South Hykeham for the production of electricity (1). This facility at South Hykeham is of 'Significant Importance' as	Any fields currently growing biomass where solar PV is proposed will become solar PV. Land allocated for landscaping and habitat creation will equally become planted vegetation and grassland. The Applicant acknowledges that some of the Site is used currently for biomass production. Similarly parts of the Site are used to grow wheat and barley that are distilled into bioethanol for adding to petrol for vehicles. Demand for the latter is expected to reduce during the Proposed

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			to warrant avoidance of it by realignment of Lincoln Eastern Bypass route)(2),construction of which is due to start shortly (early 2026). The fields around Stocking Wood adjacent to Clay Lane in the TOTH area allocated for solar panels ('Solar Infrastructure') by FGE. Digestate lagoon with storage capacity of 8378 cubic metres located close by adjacent to/access from Clay Lane. The South Hykeham digester also operates a similar operation at Thurlby (with similar storage lagoon and land use) (3) where FGE has designated land as 'Other areas which may be required for landscaping and habitat creation' (the latter is hardly compatible with intensive crop growing for digester). How will these activities continue – or will FGE be replacing one established carbon neutral electricity production system with another, the latter to the detriment of the aesthetics of the area, the appearance of the countryside and the e[ect on the quality of life of the local population choosing to enjoy their immediate countryside and visitors attracted to NKDC's promoted 'Stepping Out' route within the NKDC's promoted 'Witham Valley Country Park'	Development lifetime, as petrol cars are gradually phased out, making land in the UK used for this purpose available for other uses. Solar PV is also a more efficient way to produce electricity on a per hectare basis than growing biomass. The Applicant understands the Digester facility has a large catchment area for crops and is able to source fuel from other parts of Lincolnshire. The environmental effects have been assessed in the Environmental Statement and are summarised in a Non-Technical summary **[AS-097]**. The Planning Inspectorate will assess the planning balance to determine if the Proposed Development should be given consent.
REP1-106	Anne Heard	Socio-Economics Assessment of Cumulative Impacts	In paragraph 12.10.5 of Chapter 12 Socio-Economics and Land Use (AS-016) the Applicant sets out the cumulative development schemes which it has taken into account. This list omits the planning application 25/0533/FUL for the 1GW Bess by Navenby Energy Limited at Hill Rise Coleby and the Screening Opinion 23/0584/EIASCR and Scoping Opinion 23/0390/EIASCO for a 400 MW BESS on land north of Green Man Road Navenby.	Figure 15-3 **[AS-078]** illustrates the location of the short list of cumulative developments. The Brant BESS scheme is labelled as ID108 and NKDC reference 25/0533/FUL. The 23/0584/EIASCR and Scoping Opinion 23/0390/EIASCO for a 400 MW BESS on land north of Green Man Road Navenby are for the Navenby BESS scheme, ID86 and its submitted NKDC planning application is reference 25/0491/FUL (it is noted the full planning application site for the Navenby BESS is on the other side of Green Man Road to the original screening and scoping requests). Chapter 15 Cumulative Effects and Interactions **[APP-040]** includes a description of these schemes and their status at the time of writing the ES. These schemes are mentioned in Paragraph 12.5.43 of Chapter 12 Socio Economics **[AS-016]** as part of the assessment of Development Land. Paragraph 12.10.5 bullet l of the same chapter mentions ID 86 – Navenby BESS Project - 25/0491/FUL is included as part of the cumulative effect assessment. The Brant BESS scheme is included within Chapter 15 Cumulative Effects and Interactions **[APP-040]** and was therefore considered as part of the assessment, but was omitted in error in Paragraph 12.10.5.
Biodiversity and Nature Conservation				
REP1-121, REP1-127, REP1-131, REP1-132	Joanne Mawditt, Helen Nunziatina Joan Powell, Allyson Julie Sorrell, Martin Robert Sorrell	Habitat Fragmentation	Habitat fragmentation and the disruption of wildlife corridors for birds, reptiles, and insects cannot be mitigated by simple landscaping. Comments concerned about impacts of the Proposed Development on local wildlife.	It should be noted that the assessment presented in Chapter 8 Ecology and Nature Conservation of the ES **[REP1-019]** identified no significant adverse effects upon ecological receptors as a result of the construction, operation and decommissioning of the Proposed Development. Significant beneficial effects will be established during operation upon a variety of habitat types (including woodland, grassland and hedgerows), for example new hedgerow planting and bolstering of existing defunct hedgerows will increase connectivity across the Order Limits for species such as bats. Additional grassland and conservation margins provided adjacent to and beneath the solar PV panels in the Principal Site, and larger permanent grassland fields, including in arable field margin in retained arable fields, will increase the

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				diversity of flora in comparison to existing intensive agriculture and provide new habitat niches to encourage fauna such as invertebrates and birds. Habitats such as woodland and hedgerows within, and surrounding, the Order Limits will be protected and buffered, wherever practicable, by a minimum of 15m from the Proposed Development. The buffer zones will be in accordance with British Standard Recommendations BS 5837:2012, as stated in the Framework CEMP **[APP-189]**. These buffer zones will not only ensure protection, but in combination with the habitat creation proposed in the Framework LEMP **[REP1-039]**, will allow regeneration / expansion of the woodland edges and hedgerows to provide additional habitat and linkages around the area. The development of a detailed CEMP and a detailed LEMP, to be substantially in accordance with the framework plans, is secured via Requirement 12 and Requirement 8 of Schedule 2 to the Draft DCO **[REP1-007]** respectively. Requirement 12 and 8 of the Draft DCO **[REP1-007]** includes LCC and the Environment Agency (amongst other statutory bodies) as prescribed consultees in respect of the final CEMP and LEMP.
Cumulative Impact				
REP1-093, REP1-122	Theresa Brewer	Cumulative Impact – BMV Land	Concerns regarding the Cumulative Effect of Proposed Schemes in the area proposing to connect to the Navenby Substation which are all sited on BMV and quality Farmland.	As set out in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**, the permanent loss of BMV land as a result of the Proposed Development relates to the permanent loss of 1.5ha of Grade 3a to ecological enhancements, which is noted as likely to be beneficial to the soil resource, although it is acknowledged that the magnitude of impact relates to the withdrawal of land from agricultural production, and therefore is established as a minor adverse effect. It is estimated that the solar NSIPs in Lincolnshire, together with the Proposed Development, account for approximately 1.4% of the BMV land in the County of Lincolnshire. Whilst there is a degree of uncertainty around this proportion (based upon available data and associated limitations of study) it is indicative that the solar NSIPs represent a small proportion of BMV land in the County. It is anticipated that these solar NSIPs, like the Proposed Development, will be temporary developments and reversible (although the Applicant cannot speak for other applicants), whereby the land utilised for the Proposed Development is projected to be returned to the landowners and expected to be returned to pre-development use (i.e. agriculture) following decommissioning (although the landowners would choose how the land is to be used and managed), except for relatively small areas used for habitat creation, such as woodland planting, which is anticipated to be retained. As a result, no significant effects on agricultural land were identified for any of the solar NSIPs identified in Section 12.10 Cumulative Assessment of Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**.
REP1-091, REP1-096, REP1-099, REP1-100, REP1-111, REP1-112, REP1-113, REP1-114, REP1-119, REP1-131, REP1-132	Ruth Abrahams, Michael Campbell, Andrew Cronin, Lisa Cronin, Andrew Keeling, Allyson Julie Sorrell, Martin Robert Sorrell, Alistair King, Gordon Kobish, Sue Kobish, susan mackintosh sanders	Cumulative Impact of multiple solar projects in Lincolnshire	Lincolnshire is being disproportionately targeted by schemes like Springwell and Beacon Fen. This cumulative effect threatens to blanket the region between Lincoln, Newark, and Sleaford, making rural living increasingly difficult and psychologically taxing. The cumulative effect of all the solar and BESS proposals for this part of North Kesteven, if granted, will destroy our landscape and impact our lifestyle severely. No part of the district will be free from battery containers and panels. There will be nowhere to walk where solar industry does not intrude.	The Applicant acknowledges the concern regarding the cumulative impact of the Proposed Development on the Lincolnshire countryside and local amenity. A detailed Cumulative Effects Assessment has been undertaken and is presented in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. The short list of cumulative developments, inclusive of the relevant solar proposals in the area, has been agreed with NKDC and LCC and is provided in Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]**. Chapter 15: Cumulative Effects and Interactions of the ES **[APP-040]** includes an assessment of cumulative impacts between the Proposed Development and other proposed projects and land allocations. This includes consideration of the Proposed Development in-

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			The National Grid submission at the pre-examination stage references seven generation projects that are requesting a grid connection through its proposed substation at Navenby. This is a further four projects in addition to the Fosse Green Energy, Springwell and Leoda solar farms that have so far been announced. Full details of these additional projects need to be understood. The Navenby and Coleby (Brant) BESS proposals also need to be included in the consideration of cumulative impacts. The assessment needs to weigh the renewable energy benefits against the detrimental impacts on what is a relatively small rural area in terms of harms to landscape and rural character; agricultural production and economy; the amenity of resident communities; and countryside recreation	combination with Springwell Energy Farm (ID 63), Leoda Solar Farm (ID 103), Brant Energy Storage Scheme (ID 108 – it is assumed this is the Coleby BESS referred to in the comment), Navenby BESS (ID 86), and the proposed National Grid substation near Navenby (ID 105). The Proposed Development has been subject to an iterative design process to minimise impacts on local amenity. Embedded mitigation measures have been incorporated into the design of the Proposed Development such as new planting, enhanced management of existing vegetation, and the introduction of offsets to reduce visibility of infrastructure from nearby settlements. These measures are designed to reduce the visual dominance of the development and limit the contribution of the Proposed Development to cumulative impacts. The Applicant has responded in further detail to comments regarding cumulative effects and effect interactions within **Table 7-10 (Page 294)** of the **Applicant's Response to Relevant Representations [REP1-047]**.
REP1-099, REP1-100, REP1-124,	Andrew Cronin, Lisa Cronin, Councillor Marianne Overton,	Cumulative Traffic and Transport Impacts	Lincolnshire County Council, as Highway Authority, must consider cumulative construction impacts. The proposal conflicts with: Local Plan Policy LP25 (Transport and Accessibility). Overlapping construction periods across several NSIPs would generate prolonged HGV movements on rural roads, adversely affecting safety, accessibility and local amenity. These cumulative impacts have not been convincingly addressed.	An assessment of the potential effects relating to additional construction traffic including on severance, driver delay, road traffic incidents and safety is carried out within Chapter 13: Traffic and Transport of the ES **[APP-038]**, in accordance with the legislation and planning policy outlined in Appendix 13-A: Traffic and Transport Policy and Legislation **[APP-163]**. This assessment considers vulnerable road users, such as pedestrians, cyclists and horse-riders, when establishing the sensitivity of the road links and junctions assessed, as noted in Table 13-7 of Chapter 13: Traffic and Transport of the ES **[APP-038]**. This assessment concludes that the Proposed Development is not expected to result in any significant effects with the proposed embedded mitigation in place. The assessment has used the shortest expected construction programme (24 months), which provides a worst-case scenario in terms of construction vehicle trips as this is based on a rapid, and so shorter, construction period that would generate the highest number of peak hour and daily road trips on the local network. Section 13.10 of Chapter 13: Traffic and Transport of the ES **[]** details the cumulative traffic and transport assessment undertaken by the Applicant. In summary, based on the details set out in Table 13-45, the cumulative effects expected on Traffic and Transport receptors within the Study Area are likely to be Slight Adverse or Neutral (Not Significant), therefore not warranting any further assessment. Details related to the cumulative assessment methodology, baseline and assumptions have been agreed with LCC. LCC and National Highways in their respective capacities as local highway authority and highway authority for the strategic road network, have deemed the impacts on the road networks to be acceptable in principle **[RR-157]** and **[RR-201]**.
REP1-104	James Gallagher	Cumulative Effects Assessment	The Fosse Green Energy (FGE) construction phase is anticipated to be 2031- 33 (based upon a connection offer of 30 May 2033 to the proposed Navenby substation with that construction being completed in late 2029). The applicant has made assumptions that allow the exclusion of other energy schemes from the cumulative assessment in paragraph 13.10.8 of Environmental Statement chapter 13 on traffic (APP 038). The assessments are based upon a peak year for construction traffic quoted as "2032" in paragraph 13.10.6 of	Lincolnshire County Highways have reviewed the assessment on traffic and transport (Chapter 13 **[APP-038]**) and the Applicant will provide an update on points of agreement and disagreement in its Statement of Common Ground with LCC at Deadline 3. The Applicant has based the cumulative effect assessment in Chapter 13 **[APP-038]**) on the available information in the public domain at the time. To assume all the cumulative developments will be constructed at the same time would overestimate the impact on traffic and transport. Current available information

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			that document. The assumptions on which the exclusions are based are somewhat dubious. For example: 13.10.8.h relates to a BESS application (NKDC ref 25/0491/FUL) for land south of Green Man Road (note 13.10.8.h incorrectly refers to the site as being north of Green Man Road) and states "It is anticipated that the scheme would be fully operational by 2034. Therefore, this has been screened out of this cumulative assessment due to the lack of temporal overlap between the Proposed Development and the scheme". It is not clear why being fully operational by 2034 precludes an overlap with the NGE construction phasing of 2031-33. Furthermore, at the public consultation event for the BESS, in March 2025, it was stated that both projects shared parent companies and so would co-ordinate their works on Green Man Road to minimise construction costs. 13.10.8.o relates to Gorse Hill Lane, Wellingore BESS (NKDC ref 24//0075) and says "Based on the screening opinion decision dated May 2024, the scheme has been deemed as not an EIA Development and therefore does not require an Environmental Statement to assess its impact. It is anticipated that the scheme would be fully operational by 2032. Therefore, it has been screened out of this cumulative assessment due to the lack of temporal overlap". It should be noted that the applicant said 24/0075 does not need an Environmental Statement and that may have led to an assumption that less time would be needed to secure planning permission and hence construction complete before FGE begins construction; in fact NKDC on 9 May 2024 said "the proposals are EIA development. An Environmental Statement will therefore be required in support of any future planning application." 13.10.8.q. relates to Leoda Solar Farm and states "Based on the information provided within the EIA Scoping Report (January 2025), the anticipated construction phase is expected to commence in 2028 and continue for a period of 24 to 36-months". Local residents now understand that timetables are slipping. One reason is that promotors of new energy projects are unlikely to commit to significant construction costs until there is certainty about the operational date of the National Grid Navenby Substation (NGNS) which is unlikely to be late 2029 - there is therefore likely to be slippage in the start date of schemes intending to connect to NGNS, like Springwell, with resultant “bunching” of construction periods. Commercial considerations mean that if NGNS is operational in 2029, it makes sense to bring forward FGE construction from the dates assumed in Chapter 13. Indeed, in paragraph 2.1.2 of Grid Connection Statement (APP 200), the applicant states an intention to negotiate an advancement in the connection queue. Whilst this advancement may or may not be granted, it fundamentally undermines the applicant's cumulative impact assessment. Finally , the applicant asserted during ISH 1 session 4 at 13:39	shows the proposed energy generating and BESS projects in the area will connect to the proposed NGET substation near Navenby NESO at different years. An update is expected later in 2026 and – although the connection dates may change slightly – the Applicant still expects varying connection years for these cumulative schemes. This means the construction periods for these BESS projects should not overlap with the peak construction period for the Proposed Development. Please note that the construction traffic associated with the Cable Corridor vehicle movements is shown in the ’12-Hour Weekday (07:00-19:00)’ column of Table 13-26 within Chapter 13: Traffic and Transport of the Environmental Statement **[APP-038]**, as shown below. This table is incorrectly titled as ‘Construction Traffic Impact (2032) – Principal Site – Development Peak Hours’ **[emphasis applied]**, however, this does include cable route traffic as well as principal site traffic. As can be seen by the table, an increase of 60 vehicle movements over a 12-hour weekday is anticipated at each of Junctions 9-12. These are associated with the Cable Corridor construction activities – for reference, the forecast peak daily and hourly construction movements for the Cable Corridor are set out in Table 4 of the Framework Construction Traffic Management Plan **[AS-102]**, which identifies that cable route construction vehicles will be timed to occur outside peak hours (aside from one shuttle bus two-way movement between 08:00 and 09:00 and again between 17:00 and 18:00). As noted in paragraph 13.7.16: “*It can be observed that the screening results presented above indicate that all of the receptors located within the Cable Corridor have been screened out owing to the low number of additional vehicle trips and have therefore not been assessed further*.”

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			"section 2.6 of en three sets out that where flexibility is sought, as is the case with the proposed development, applicants should assess the worst case, environmental, social and economic effects of the proposed development to ensure that the impact of the project as it may be constructed have been 6 properly assessed, as confirmed in chapter five, environmental impact assessment methodology of the environmental statement". There is no evidence that the applicant has applied this methodology to the cumulative traffic assessments. My suspicion is that the assessment of the Highways Authority of a neutral cumulative traffic impact was based just on the applicant's scoping assumptions. If this is the case, then it would seem appropriate to ask Lincolnshire County Council to reappraise the cumulative traffic impacts based upon a range of plausible construction timings. In the Environmental statement chapter 13 on traffic, there is a "Table 13-26: Construction Traffic Impact (2032) – Principal Site – Development Peak Hours". The table shows no development impact from construction traffic associated with the principal site at junctions J9/10/111/12 which I accept. However, there will be an impact at these junctions from the connection corridor but I can't find a similar table for the corridor. I queried this with the enquiry support team before the ISHs were held in the first week of January but was advised to contact the applicant which I have done but not as yet received a reply. Can I ask that a similar table be provided for the corridor impact?	
Safety				
REP1-093, REP1-099, REP1-100, REP1-113, REP1-114, REP1-131, REP1-132	Theresa Brewer, Andrew Cronin, Lisa Cronin, Allyson Julie Sorrell, Martin Robert Sorrell, Sue Kobish, Gordon Kobish	BESS Fire Safety	Concerns regarding the wish to build BESS anywhere near residential areas, or where the prevailing wind would carry fumes to residential areas. Likewise, operations of the RAF airbases and the air ambulance service which operates out of RAF Waddington are being put at risk. There is also a small but nevertheless real risk of long-burning fires and catastrophic explosion from thermal runaway which would impact people, animals, vehicles, buildings and infrastructure within a wide radius. At present the applicant's proposals are too vague for the Fire Service to be able to comment meaningfully on the BESS arrangements. The applicant seems satisfied that the availability of a few hours of firefighting water is sufficient. Given that battery fires may need cooling for days there is not enough regard being given to what happens when this initial water supply runs out. Where will the water come from? There are regular problems with low water pressure or interruptions to supply here in TOTH, and no water at all if the local pumps malfunction. Nor are there any detailed proposals to build a protective bund for the BESS areas to prevent potential soil and groundwater contamination.	The Proposed Development includes embedded design mitigation and protection measures to reduce fire risk, which are detailed in the Framework BSMP **[REP1-041]**. These measures include an automatic cooling system which will be integrated into the BESS to stop or reduce battery cell thermal runaway propagation. The BESS is designed so that in the event one cell overheats/catches fire, there is sufficient distance between the cells to mitigate the risk of this spreading (to keep a fire isolated to a single cell (to the extent which it is possible to control this)). This layout has been developed in consultation with the LFRS and has taken account of guidance from the NFCC. Communication with the LFRS will continue through the detailed design and construction stages. LFRS in foreseeable and credible emergency response scenarios would most likely adopt a defensive firefighting strategy by using water on neighbouring areas such as battery enclosures and structures to cool down and prevent further fire spread. This approach ensures that environmental pollution risks are minimised and is in line with NFCC Guidance which states "If it can be confirmed that the recommended firefighting tactic for the BESS is to defensively fire fight and boundary cool whilst allowing the BESS to consume itself, this will reduce the water requirements, and thus the drainage/environmental protection requirements significantly.". The focus of the Framework BSMP **[APP-189]** is to prevent a fire occurring. There have been very few utility scale BESS fires in the UK to date, all of

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			Comment that reassurance is required that the latest guidance is being applied, for example the National Fire Chiefs Council (NFCC) guidance and that comments from the UK Health and Security Agency are being taken into account. Lithium-ion BESS installations pose known risks, including thermal runaway, long-duration fires and toxic emissions. EN-1 requires that risks to public safety are fully assessed and demonstrably acceptable. Lincolnshire County Council's responsibilities for emergency planning and public safety require clear evidence that: - credible worst-case scenarios have been assessed - emergency response arrangements are deliverable - cumulative BESS risk has been fully considered This assurance has not been provided.	which were built prior to the current NFCC safety guidance, meaning that the components / setup which caused these fires are no longer permitted for use, and therefore will not be used within the BESS of the Proposed Development. The Framework BSMP **[REP1-041]** is to be developed into a detailed BSMP, substantially in accordance with the Framework BSMP, as secured under Requirement 7 of Schedule 2 to the Draft DCO **[REP1-007]**. It is noted that the LFRS are a named consultee on this Requirement, and as such the LFRS will have the opportunity to review the detailed BSMP prior to any approval. As noted in the Framework BSMP **[REP1-041]**, (at paragraph 4.3.3), each indicative BESS area design will contain a minimum of two firewater storage units of no less than 230,000 litres in capacity, capable of delivering 1,900 litres per minute for 2 hours, in line with the NFCC Guidance. The Applicant has consulted NFCC guidelines and engaged with LFRS throughout the pre-application phase and will ensure that the detailed BSMP includes any subsequent revisions made to NFCC guidelines. Close consultation will continue with LFRS throughout the detailed design stage The Applicant has responded in detail to comments regarding safety and fire risk as a result of the BESS within **Table 7-14** (Page 337) of the **Applicant's Response to Relevant Representations [REP1-047].**
REP1-096, REP1-108	Michael Campbell, Philip John Heard	BESS	The application lacks clarity on whether BESS will be centralised or dispersed and on Grid connection status. Comment that dispersed BESS would increase land take and landscape harm. Accident rate assumptions are considered unrealistic and no clear national guidance exists on safe separation distances. It is requested that the BESS element is withdrawn or clarification is given on evidence of grid connection and a separate planning application for BESS is submitted. Whether the units are clustered or dispersed, the applicant's reliance on an overly optimistic accident rate is not credible. In particular, the assertion that a fire would not spread to adjacent units and that contaminated fire-fighting water would not enter local watercourses is unsupported by real-world evidence.	The Proposed Development does include the flexibility at this stage for a centralised or distributed BESS. BESS is an important component of the transition to net zero and providing flexibility to the energy system. Design Principle 11 in the Design Approach Document **[APP-186]** sets out that the Proposed Development will ensure that battery safety is managed through appropriate siting away from sensitive receptors and ensuring the inclusion of embedded design mitigation measures to minimise risks. This Principle has led to a Design Commitment, which will be secured under Requirement 6 of Schedule 2 of the Draft DCO **[REP1-007]**. This is Design Commitment BA1 which states that the centralised BESS, if chosen, will be sited a minimum of 200m from residential receptors. The design of the Proposed Development includes integrated mitigation and protection measures are detailed in the Framework BSMP **[REP1-041]**. The BESS layout has been developed in consultation with the LFRS and has taken account of guidance from the NFCC. The provision of a detailed BSMP is secured under Requirement 7 of Schedule 2 of the Draft DCO **[REP1-007]** and will be substantially in accordance with the framework. Under this Requirement, the detailed BSMP must be approved.
Proposed Development Design				
REP1-126, REP1-128, REP1-131, REP1-132	Mrs Diane Plumb, Malcolm Robert Ramsay, Allyson Julie Sorrell, Martin Robert Sorrell	Solar Efficiency	Comment on the efficiency of a project of this scale in a region characterised by a lack of consistent high-intensity sunlight compared to other latitudes. Comment on the likelihood of a technological breakthrough rendering the Proposed Development obsolete during its 60-year operational lifespan.	The Applicant acknowledges that the energy generated by solar PV panels is intermittent in nature, due to factors associated with the UK climate and seasonal variations. While efficiency varies by technology and conditions, solar panels are designed to maximise energy production even in less-than-ideal conditions, such as local weather conditions. Innovations in panel design and materials continue to enhance efficiency, making solar power a viable and effective renewable energy source. Overplanting for panel degradation leads to more time in the year when the export capacity is achieved during periods of sub-optimal weather. By co-locating battery energy storage systems (BESS) with solar PV, the Applicant is able to

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				maximise the benefits of the renewable energy generated by the Proposed Development. BESS enables time-shifting of solar output, absorbing energy when generation exceeds demand and discharging it during system peaks in demand. This reduces curtailment, increases utilisation of solar capacity, and can provide ancillary services to the power grid. Further information is provided in the Statement of Need **[APP-184]**. The solar farm is still considered critical national infrastructure irrespective of whether the BESS would be constructed, and able to make a positive contribution to providing renewable energy to the UK grid mix, as outlined in the Statement of Need **[APP-184]**. The ability to replace panels, where it is economical and practical to do so, part way through the lifetime of the Proposed Development allows for the implementation of any advancements in the technology to maximise the renewable generation onsite.
REP1-093	Theresa Brewer	Cable Corridor	Further information requested regarding the Cable Corridor and what the end result will look like. Will there be fencing or inspection points and what would these look like, including what size they would be.	All cables for onsite connections and grid export will be buried underground, there will be no above ground physical features. The only above ground cables are those that may be attached to the rear of panels. The undergrounding of the cables is included within the relevant Work No's of the Proposed Development Parameters **[REP1-029]** – this is secured by Requirement 6 Detailed design approval of the Draft DCO **[REP1-007]**. As stated, Section 2.3 of the Framework DEMP **[REP1-035]** provides flexibility as to the method of cable decommissioning. Cables and cable ducting could either be left in situ or removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open up the entire length of the Cable Corridor. The mode of cable decommissioning for the Cable Corridor and interconnecting cables will be dependent upon government policy, the preferences of the County and best practice at the time of the decommissioning phase. Should the County wish for the connection cables to be removed, this would be discussed and agreed prior to decommissioning
REP1-093, REP1-103, REP1-115	Theresa Brewer, Carl John Anton Koenon	Density of the Proposed Development around Thorpe on the Hill	Concerns regarding density of the Proposed Development around Thorpe on the Hill and impacts on the community with regards to access and recreation, views of agricultural fields and health and wellbeing. The community of Cathedral View (within the Parish boundary of Thorpe on the Hill) will be encased on three sides by solar panels. NPS EN-3 (para 2.10.35 & 2.10.36 clearly encourages applicants to minimize visual impacts on public rights of way and to maximize opportunities for enhancement which has not been taken into account by the applicant.	Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** concludes that the Proposed Development will have a moderate adverse (significant) impact during construction (in winter), reducing to a minor adverse (not significant) impact by Year 1 of operation (in winter), a minor adverse (not significant) impact by Year 15 of operation (in winter) and a negligible adverse (not significant) impact by Year 15 of operation (in summer) on the residents of Thorpe on the Hill. The Framework LEMP **[REP1-039]** outlines the landscape and ecology impact avoidance measures that would be implemented prior to, and during, construction of the Proposed Development, as well as the habitat restoration, enhancement, management and monitoring measures to be implemented once the Proposed Development is operational. When making a decision on the DCO Application, the Secretary of State will need to balance these impacts against the urgent need and critical national priority for the Proposed Development as set out in the energy NPSs. Changes to the design have been made in the vicinity of Thorpe on the Hill in response to feedback received from Thorpe on the Hill Parish Council and local residents during statutory consultation to reduce the impact of the Proposed Development. This has included the removal of solar PV within the field south-east

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				of Thorpe on the Hill, which is now an area of managed arable fields for bird mitigation purposes (i.e. no solar infrastructure proposed), to increase the distance from the village to the Proposed Development itself, and providing additional vegetation screening along Fosse Lane. As such, the Proposed Development design provides a 300m buffer between the proposed solar infrastructure and residential receptors in Thorpe on the Hill. See Figure 3-2A of the ES **[AS-022]** and the Framework LEMP **[REP1-039]** for details. The Design Approach Document **[APP-186]** provides further details of all the design changes made in response to responses made to non-statutory and statutory consultation, the outcomes of environmental assessment and national and local planning policy.
REP1-093	Theresa Brewer	Quantity of Battery Storage	Concern regarding the quantity of battery storage on the Site and that batteries are to be used for storing off-site energy.	The main purpose of the BESS is to increase the operational efficiency of the on-site solar PV panels by ensuring that energy generated by them can be stored when demand is low and released to the grid when it is needed. The BESS will also support the wider grid by providing a balancing mechanism that enables the import of power from, and the export of power to the grid. In this way battery storage will play a key role in transitioning to net zero with the additional storage capacity also benefitting the wider electricity system. The Planning Statement **[AS-098]** and Statement of Need **[APP-184]** both discuss the supporting planning policy for co locating a BESS with solar PV and highlight the ability of this combination to support the National Electricity Transmission System. The inclusion of a BESS will be a major contributing factor to the success of the Proposed Development by ensuring that surplus electricity generation on peak sunny days is stored rather than wasted, but also in its ability to support the wider Electricity System by importing electricity when there is excess electricity in the National Electricity Transmission System and exporting it when demand is high.
REP1-113, REP1-114	Gordon Kobish, Sue Kobish	Temporary vs Permanent	How can the siting of this solar panels and associated batteries scheme, with its associated land changes and infrastructure be classed as 'temporary' when it is designed to be in place for 60 years? We note FGE state that any infrastructure in the ground below 0.9 metres will be left and not removed during the decommissioning process. This, surely, means that the scheme is a permanent feature and cannot in any way be classed as 'temporary'?	The 60-year lifetime is considered appropriate for the Proposed Development and aligns with some other consented solar projects, whereby the 60-year lifetime of the Proposed Development will provide urgently needed low-carbon renewable electricity and be a critical part of the national portfolio of renewable energy generation that is required to decarbonise its energy supply quickly and contribute to the transition to net zero. The Applicant has responded to comments relating to the justification for the duration of the Proposed Development in the following sections of the **Applicant's Response to Relevant Representations [REP1-047]:** • **Table 3-1 (Section 2)** on Page 94, in response to **RR-210** • **Table 7-11** on Page 308, in response to **RR-222** • **Table 7-13** on Page 327, in response to **RR-027, RR-095, RR-192, RR-228, RR-245, RR-273, RR-276** As stated, Section 2.3 of the Framework DEMP **[REP1-035]** provides flexibility as to the method of cable decommissioning. Cables and cable ducting could either be left in situ or removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open up the entire length of the Cable Corridor. The mode of cable decommissioning for the Cable Corridor and interconnecting cables will be dependent upon government policy, the preferences of the County and best practice at the time of the decommissioning

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				phase. Should the County wish for the connection cables to be removed, this would be discussed and agreed prior to decommissioning.
REP1-108	Philip John Heard	Length of Operation	NPS EN-3 states an applicant is required to 'seek consent' for a time-period above 40 years. Where has the Applicant done this and with what justification?	Paragraph 4.1.21 and Paragraph 4.1.22 of the Planning Statement **[AS-098]** discusses the time limited consent of the Proposed Development. Paragraph 4.1.22 states the Applicant is seeking a time limited consent for the Proposed Development to be in operation for 60 years, with decommissioning to take place following cessation of operation. A 60-year time limited consent will maximise the renewable energy generation of the Proposed Development and allow for replacement of panels halfway through if there is a loss in output capacity. A 60-year time period also allows flexibility for technological advancements in PV arrays after a few decades, should it be available. The operational life of the Proposed Development is anticipated to be 2033 to 2093. With regards to the duration of the operation of the Proposed Development, it should be noted that the non-permanent and reversible nature of a solar NSIP with 60 year consent has also been acknowledged in the Secretary of State's decisions on Tillbridge Solar Farm, Mallard Pass Solar Project, West Burton and Gate Burton Energy Parks which have all been granted development consent.
REP1-108, REP1-113, REP1-114	Gordon Kobish, Sue Kobish, Philip John Heard	Firewater Storage	Is the amount of water required for firefighting to last 2 hours or 4 hours? (discrepancy at Examination 1 which, I believe, was established at 4 hours)? How much water (cubic metres and/or gallons) will be required? Can local water authority (currently Anglian Water) have such capacity and pressure etc. to supply? Would storage reservoirs be necessary and be requested? If so where and how much area of land would be needed together with safety measures and where would they be sited? It was stated at the Examination hearing that in case of fire at a battery container 'there are measures in place to stop the spread of fire to adjacent containers and batteries'. No questioning as to what these measure/s were on this, not even from Lincolnshire Fire & Rescue Representative! What are these measures? How would they work? Are such measures tried and tested? From research, no such measures apart from large spaces in between containers) seem to be available – such separating measures will increase the area of land needed for battery storage.	As noted in the Framework BSMP **[REP1-041]**, which has been updated and will be submitted to the Examination at the next available examination deadline (at paragraph 4.3.3), each indicative BESS area design will contain a minimum of two firewater storage units of no less than 230,000 litres in capacity, capable of delivering 1,900 litres per minute for 2 hours, in line with the NFCC guidance. The Applicant has consulted NFCC guidelines and engaged with LFRS throughout the pre-application phase and will ensure that the detailed BSMP includes any subsequent revisions made to NFCC guidelines. Close consultation will continue with LFRS throughout the detailed design stage. A Water Resources Assessment (WRA) was completed for Anglian Water Services (AWS) consultation, and will be submitted to the Examination at the next available Examination deadline. The WRA includes best estimates of water use at the time of submission of the DCO Application. In response to the WRA submission, AWS confirmed via email, on 28 May 2025 and 23 December 2025 that they are able to provide the Applicant with the water to meet all outlined requirements (both domestic and non-domestic) during the construction and operational phases of the Proposed Development. The Applicant has responded in detail to comments regarding safety and fire risk as a result of the BESS within **Table 7-14** (Page 337) of the **Applicant's Response to Relevant Representations [REP1-047].**
Decommissioning				
REP1-093, REP1-106 REP1-108, REP1-113, REP1-114, REP1-124	Theresa Brewer, Gordon Kobish, Sue Kobish, Anne Heard, Councillor Marianne Overton, Philip John Heard	Decommissioning Responsibility and Funding	Comment regarding responsibility during the decommissioning stage and whether the land will be cleared of solar and returned in a fit state for agricultural use. Clarity required on funding mechanisms. Applicant has not demonstrated credible technical, financial, or logistical plans for end-of-life management. It is necessary that, throughout the life of the project, there is a requirement that secures funds for decommissioning and	The Applicant has responded to comments regarding responsibility during decommissioning in detail within **Table 7-17** (Page 359) of the **Applicant's Response to Relevant Representations [REP1-047].**

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			remediation at the end of temporary life, such as a performance bond. It has been argued that such bonds are not necessary as the scrap value proceeds would fund remediation; if correct, the cost of such a bond should be negligible to an operator. However, if such a bond is commercially unattractive during the early years of operation, funding should be set aside annually into an escrow account during the initial fifteen years of operation (as these are likely to be the most financially rewarding). It would be appropriate for the applicant at the fifteenth year stage to be required to secure a bond to cover any shortfall between the cost of remediation and the valuation of the escrow account. Furthermore, should the applicant sell the undertaking to another entity, it would be appropriate to require the new owner to secure a bond at the point of sale if the sale is prior to the fifteenth year	
REP1-124, REP1-125, REP1-131, REP1-132	Councillor Marianne Overton, Charles Peter Overton, Allyson Julie Sorrell, Martin Robert Sorrell	Decommissioning Commitment	I am concerned that once the land is classified as "previously developed," it creates a loophole for future developers to bypass greenfield protections and build permanent housing or industrial estates after the 60-year lease expires.	Under Requirement 20 of the Draft DCO **[REP1-007]**, decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of the operational life of the Proposed Development, land will be reinstated to its current quality and returned to the landowners who would then choose how the land is to be used and managed. Any material change of use would require planning permission. The Framework DEMP **[REP1-035]** submitted with the DCO Application sets out the principles and measures to be followed in the decommissioning phase of the Proposed Development. The provision of a detailed DEMP, which is to be substantially in accordance with the framework plan, is secured under Requirement 20 of the Draft DCO **[REP1-007]**. It should be noted that the breach of the terms of a DCO amounts to a criminal offence and the provisions and Requirements of a DCO are enforceable by the Local Planning Authority.
Traffic and Transport				
REP1-108, REP1-106	Philip John Heard, Anne Heard	Traffic Management	Comment regarding "*APP-038 Para 13.4.67. Although the Proposed Development is located close to several villages/settlements including Thorpe on the Hill, Haddington and Bassingham, only a small proportion of trips are expected to either originate from or pass through these villages.. Any such trips are expected to be local construction worker trips and not HGV trips ….” However, the next paragraph (13.4.68) states “Where practicable, the Framework CTMP **[EN01054/APP/7.18]** will restrict HGVs to routes which avoid these villages ….*" is it NO HGVs or only no HGVs when it is PRACTICABLE? Indeed, having specifically stated in APP-038 Para 13.4.67 that HGV trips will not pass through Haddington, APP-110 (Figure 13-4) shows HGVs being routed through the village, as well as Thurlby. So when the Applicant states “where practicable” it in fact appears to be planned that that HGVs will go through these villages.	Figure 13-4: Heavy Goods Vehicle (HGV) Routing of the ES **[AS-072]** shows HGV routings through Harmston associated with the Cable Route Corridor. The assessment of the potential effects relating to additional construction traffic is carried out within Chapter 13: Traffic and Transport of the ES **[APP-038]**. This concludes that the Proposed Development is not expected to result in any significant effects (including the links and junctions associated with Harmston) with the proposed embedded mitigation in place, as secured by the Framework CTMP **[REP1-043]**. This is agreed by LCC who state in paragraph 11.18 of their Local Impact Report **[REP1-053]** (that “*Subject to the necessary mitigations being secured and implemented, the Council concludes that traffic and transport impacts of this development during all phases of the development would be neutral.*”

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REP1-122, REP1-124	John Morris, Councillor Marianne Overton,	Adequacy of Road Infrastructure to support the Proposed Development	Concern regarding the impact of additional development traffic, cars, buses and HGV's would be significantly negative on these rural roads. The County Council Local Impact Report notes "no positive effects" in Section 11 on traffic and "adverse effects" in paragraph 11.12. As only adverse impacts have been identified, the transport impact must be termed negative irrespective of the severity. Comment regarding road infrastructure to support contractors building the Proposed Development Roads are unsuitable for heavy vehicle and are already in poor condition.	An assessment of the potential effects relating to additional construction traffic including on severance, driver delay, road traffic incidents and safety is carried out within Chapter 13: Traffic and Transport of the ES **[APP-038]**, in accordance with the legislation and planning policy outlined in Appendix 13-A: Traffic and Transport Policy and Legislation **[APP-163]**. This concludes that the Proposed Development is not expected to result in any significant effects with the proposed embedded mitigation in place, including significant disruption to local residents and businesses. The assessment has used the shortest expected construction programme (24 months), which provides a worst-case scenario in terms of construction vehicle trips as this is based on a rapid, and so shorter, construction period that would generate the highest number of peak hour and daily road trips on the local network. LCC and National Highways in their respective capacities as local highway authority and highway authority for the strategic road network, have deemed the impacts on the road networks to be acceptable in principle **[RR-157]** and **[RR-201]**. Adequate traffic management measures to ensure safe driving will be implemented as set out within the Framework CTMP **[AS-102]** a detailed version of which is to be produced, substantially in accordance with the framework plan, as secured under Requirement 14 of the Draft DCO **[REP1-007]**. This includes measures to limit when vehicles can travel to and from the Site in order to avoid peak traffic times. A monitoring system would be put in place along the route of all HGVs travelling to and from the Site which would record any noncompliance and communicate any issues with the relevant contractors/suppliers and the Framework CTMP **[AS102]** also provides details of enforcement measures should there be any instances of noncompliance. Other traffic (e.g. LGVs and cars) has been considered within the assessment presented in Chapter 13: Traffic and Transport of the ES **[APP-038]**, as set out in paragraph 13.4.65. No formal routing is proposed for non-HGV vehicles, however it is anticipated that they would in general follow main roads/ routes to access the Proposed Development. As stated in the Framework CTMP **[AS-102]** paragraph 5.4.5, a shuttle bus service will be utilised to transport construction workers from the Principal Site to the relevant Cable Corridor access (and vice versa) to reduce vehicular trips on the surrounding highway network. The Applicant has responded to Lincolnshire County Council's Local Impact Report within the **Applicant's Response to Local Impact Reports [EN010154/EXAM/9.10]**
REP1-091, REP1-096	Ruth Abrahams, Michael Campbell	Traffic and Transport (Thorpe on the Hill)	Traffic is already a significant problem for TOTH with commuter traffic cutting through, school run congestion and overweight lorries illegally passing through (and getting stuck on the narrow roads with tight bends) when there are problems on the A46 (frequent accidents and blockages occur between Carholme roundabout and Pennells roundabout).	Mitigation and traffic management measures to ensure safe driving will be implemented as set out within the Framework CTMP **[AS-102]** a detailed version of which is to be prepared, substantially in accordance with the framework plan, as secured under Requirement 14 of the Draft DCO **[REP1-007]**. This includes usage of committed HGV routes, see Figure 13-4 HGV Routing **[AS-072]**, none of which will pass through -Thorpe on the Hill and measures to limit when vehicles can travel to and from the Site (both in terms of HGVs and construction worker traffic (the latter due to the Proposed Development working hours) in order to avoid peak traffic times, such as the evening peak. A monitoring system would be put in place

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				along the route of all HGVs travelling to and from the Site which would record any non-compliance and to communicate any issues with the relevant contractors/suppliers. The Framework CTMP **[AS-102]** also provides details of enforcement measures should there be any instances of non-compliance. When considering the mitigation secured through the Framework CTMP **[AS-102]**, Chapter 13: Traffic and Transport of the ES **[APP-038]** establishes a negligible effect (not significant) upon A46 receptors associated with Pedestrian Delay, Fear and Intimidation, and Non-Motorised User Amenity, a negligible to minor effect (not significant) upon A46 receptors associated with Driver Delay, Road Safety and Large Loads during the construction and decommissioning of the Proposed Development. During the operational period, effects upon the A46 will be negligible, as set out in paragraph 13.7.66 of Chapter 13: Traffic and Transport of the ES **[APP-038]**. As such, no effects on traffic on the A46 are anticipated which would impact Thorpe on the Hill.
REP1-096, REP1-126	Michael Campbell, Mrs Diane Plumb (Thurlby)	Traffic and Transport	Risks to safety, damage to verges and kerbs, and parking-related hazards in Thurlby. Identified routes (e.g. Bassingham Road, Clay Lane) are considered wholly inappropriate. The routing of HGVs through Thurlby is potentially dangerous. These are unclassified roads, in some places barely wide enough for two cars to pass, and two HGVs trying to pass on the narrow roads destroys verges and kerbs. The roads are hardly fit for purpose as it is and the extra input of HGVs, additional vehicles for workers and continued maintenance is not acceptable in this area. Vehicles are frequently parked on Bassingham Road in Thurlby which can create a traffic hazard and make access for large vehicles more dangerous. Clay Lane, another road identified as a 'suitable' route is also very narrow, potholed and has no passing places, hardly suitable for existing traffic and definitely not suitable for heavy vehicles.	The potential effects of construction traffic on the environment and local road infrastructure, including on safety, have been appropriately assessed in Chapter 13: Traffic and Transport of the ES **[APP-038]**, following the relevant legislation and planning policy in Appendix 13-A **[APP-163]**. This includes both Bassingham Road, and Clay Lane. The assessment concludes that the Proposed Development is not expected to result in any significant effects upon traffic and transport receptors with the proposed embedded mitigation in place. The assessment has used the shortest expected construction programme (24 months), which provides a worst-case scenario in terms of construction vehicle trips (a more condensed construction programme would result in a higher intensity of vehicle trips, the worst-case scenario would be the maximum trips per day) as this is based on a rapid, and so shorter, construction period that would generate the highest number of peak hour and daily road trips on the local network. In addition, LCC and National Highways in their capacity of being responsible for the local and strategic road networks, respectively, have deemed the impacts on the road networks to be acceptable in principle **[RR-157]** and **[RR-201]**. The Framework CTMP **[AS-102]** sets out the measures to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network, in order to limit potential disruptions and implications on the wider transport network. HGV routing is expected to follow the most direct routes to and from the construction access points from the A46 for the Principal Site and to/ from the A15 for the Cable Corridor. The Framework CTMP **[AS-102]** will restrict HGVs to routes which avoid smaller surrounding villages when travelling to/ from the construction compounds as illustrated by HGV routing plan shown in Figure 13-

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				4 **[APP-110]**. The CTMP establishes controls to ensure that any construction traffic routed close to Thurlby is appropriately managed.. Production of a detailed CTMP, which is to be developed substantially in accordance with the Framework plan, is secured under Requirement 14 of the Draft DCO **[REP1-007]**.
REP1-131, REP1-132	Allyson Julie Sorrell, Martin Robert Sorrell	Traffic and Transport (Norton Disney)	A massive increase in HGVs on narrow lanes around Norton Disney poses direct risks to pedestrians, cyclists, and horse riders	The Framework CTMP **[AS-102]** sets out the measures to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network, in order to limit potential disruptions and implications on the wider transport network and adverse impacts on pedestrian, cyclist and equestrian safety. Figure 13-4 **[AS-072]** illustrates that none of the prescribed HGV routes go through, or in close proximity to Norton Disney and therefore there will be no additional direct risks to pedestrians, cyclists and horse riders.
Planning and Planning Policy				
REP1-134	Marc Williams	NSIP Status Queried	Comment that the Proposed Development would power at most 110,000 homes. Assertion that this 'is not "nationally significant" by any reasonable definition'.	As set out in section 2.2. of the Planning Statement **[AS-098]**, the Proposed Development is defined as a Nationally Significant Infrastructure (NSIP) Project under s14(1)(a), s15(1) and s15(2) of the Planning Act 2008 as it meets the following criteria: a. The Proposed Development comprises the construction of a generating station (s14(1)(a) of the PA 2008); b. The construction of a generating station is within s14(1)(a) only if when constructed, it is expected to be within s15(2) (s15(1) of the PA 2008); c. It would be located in England (s15(2)(a) of the PA 2008); d. It would not generate electricity from wind (s15(2)(aa) of the PA 2008); e. It would not be an offshore generating station (s15(2)(b) of the PA 2008); and f. Its capacity would be more than 50MW (s15(2)(c) of the PA 2008). As a result, the Applicant requires development consent under the PA 2008 in order to construct, operate and maintain the Proposed Development.
REP1-127,	Helen Nunziatina Joan Powell	Against NSIP/DCO process	Comment that Local Planning Authorities ought to determine all developments, distrust of PINS.	The Planning Act 2008 provides the legislative framework for decision making and defines the application process under which consent for NSIPs is sought. The Proposed Development is defined as a Nationally Significant Infrastructure Project (NSIP), as it consists of the construction of an onshore generating station in England with a capacity exceeding 50 megawatts (MW) in accordance with s14(1)(a), s15(1) and s15(2) of the PA 2008. As a result, the application for development consent (the application) has been submitted to the Planning Inspectorate who will examine the application on behalf of the Secretary of State for Energy Security and Net Zero, who will ultimately make the decision whether to grant consent pursuant to the PA 2008.
REP1-108, REP1-130	Barry Smith, Philip John Heard	Gate 2 Status	The need case (strategic alignment criteria) for the FGE project has not been met and therefore, it cannot meet the Gate 2 requirements that form part of the UK's Connections Reforms. Projects such as FGE, that have not met the defined Readiness Criteria (land, planning, finance) and claiming	The Statement of Need **[APP-184]** sets out the need case for the Proposed Development. In summary, electricity generation is identified as being a Critical National Priority and storage (such as BESS) is identified as having a key role to play in achieving net zero and therefore urgently needed to help meet the UK Government's energy objectives. If consented, the Proposed Development would

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			Confirmed Connection status to an as yet unapproved substation at Navenby must be challenged by the ExA or the democratic deficit surrounding the planning process for large scale solar PV projects will be brought into sharp relief. Under NESO connections reforms published in Dec 25, (https//:www.neso.enertgy/industryinformation/connections-reform) there is a graph headed “Great Britain’s new connections pipeline”. This identifies the delivery pipeline for 2030 (Phase 1) and 2035 (Phase 2). However, there is no dataset that identifies which schemes are included in these pipelines other than the TEC register. Furthermore, there is also the statement, “Batteries are significantly over supplied”. I would be grateful if you could advise what your intentions are to resolve this oversupply (some 300%) and help us to clarify whether the FGE project, “has become protected” which Gate 2 status implies. There is no evidence that National Grid considered Navenby as a strategically appropriate location for the Great Grid Upgrade programme. Rather it is the drive from developers such as FGE with inappropriately positioned large scale solar PV arrays on greenfield sites in the area that has led to the proposed placement of the Navenby substation. The way energy projects connect to the grid will be linked to strategic plans, in particular the Strategic Spatial Energy Plan (SSEP). This has led to NESO publishing the new connections queues. Projects that are “ready” and “needed” receive a confirmed connection date, connection point and queue position. FGE clearly has not achieved any of these requirements and therefore, cannot have Gate 2 (Confirmed Connection) status. The SSEP is due to publish in Autumn 27 and it appears that projects such as FGE are attempting to subvert this new Connections Reform process by pushing National Grid to meet their connection demands in advance of the creation of this strategic plan. Although it is recognised that there is a desire to front load approvals for renewable energy projects to reduce technology risk for grid projects in the period 2030-35, the recent government (NESO CP30 aligned solar) datasets published highlight that there is no shortage of solar generation capacity in this period. NESO highlight that their datasets do not account for the large scale increases in solar generation (approximately 10 GW nationally) that are occurring as a result of panels being fitted on domestic and industrial roofs. These capabilities will only	contribute to achieving the UK’s energy vision, as set out in both national policy and guidance. The status of the Proposed Development as a large-scale solar development with BESS will allow it to contribute to delivering net zero, support security of supply and contribute to affordability. The Applicant has confirmed within the Applicant’s Written Summaries of Oral Submissions for Issue Specific Hearing 1 **[REP1-046]** that the solar component of the Proposed Development has secured a Gate 2 Phase 2 prioritisation (i.e. between 2031 and 2035 inclusive) and that the BESS component of the Proposed Development has secured a Gate 1 offer, which means its connection date has not yet been confirmed and is currently indicative. The Applicant awaits confirmation from NESO of its confirmed connection date for the solar (expected to be issued no later than the end of Q3 2026), and NESO’s indicative connection date for the BESS (expected to be issued later in 2026). The Applicant does not consider that there is any reasonable basis to revise the timescales for the delivery of the Proposed Development from those currently stated. The Applicant will not commence construction of the BESS component of the Proposed Development until a Gate 2 connection agreement has been received. The identification of the site for the Proposed Development was driven by the availability of deliverable land and site suitability in accordance with policy requirements. Following a formal application to National Grid for a connection into the 400kV Overhead Line at Whisby, the Applicant was informed that this point of connection was not available and was instead offered, and subsequently secured, a point of connection at the proposed National Grid substation near Navenby. Regarding an overarching strategic spatial strategy for renewable energy across the country, the Strategic Spatial Energy Plan (SSEP) and Centralised Strategic Network Plan are in the early stages of development and are yet to be published. The SSEP is still in development, with the methodology published in May 2025. The final SSEP is not yet available, with the first iteration of the SSEP expected to be published for public consultation in Q2 2026. NPS EN-3 explains how projects such as the Proposed Development and this Application are required to meet the United Kingdom's Net Zero Targets. Solar forms an important part of a diverse portfolio of energy generating facilities that are required in the UK; which is recognised in NPS EN-1. The Government recognises in the Overarching NPS for Energy (NPS EN-1) that growth in large-scale solar schemes, alongside smaller schemes of solar or other renewable energy sources, is expected to improve the dependability of those assets as a combined portfolio, contributing to an adequate and dependable UK generation mix required to meet the UK’s energy security needs, and the decarbonisation needs of the UK. Whilst smaller scale energy schemes are likely to contribute to decarbonisation, large-scale solar is still an essential part of the future electricity system, that must be deployed where there is the natural resource, where land is available and suitable, and in proximity to available grid connection

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			continue to grow reflecting recent changes in planning policy for house building and industrial sites to implement green energy solutions. Hence, the need case (strategic alignment criteria) for the FGE project has not been met and therefore, it cannot meet the Gate 2 requirements that form part of the UK's Connections Reforms. The Centralised Strategic Network Plan (CSNP) is a whole system plan to 2050 which describes the network the UK will need to move power across the system. It will use the SSEP as its main input. Building a new substation on a greenfield site at Navenby has not been identified within this strategic planning process. Hence, FGE cannot have been provided with a confirmed connection date, connection point and queue position and therefore, cannot meet Gate 2 standards.	locations, such as the area local to the Proposed Development, in line with NPS EN-1. The Grid Connection Statement **[APP-200]** confirms the Applicant submitted an application for and subsequently received a grid connection offer from National Grid Electricity System Operator Limited (NESO) to connect the Proposed Development to the National Electricity Transmission System (NETS) at the proposed National Grid substation near Navenby.
REP1-091, REP1-117	Ruth Abrahams,	Adherence to Planning Policy	The proposal is contrary to local plans at county, district and parish levels, including local neighbourhood plans (such as Thorpe on the Hill).	A full appraisal of planning policy provided in Section 6 of the Planning Statement **[AS-098]**. Appendix C of the Planning Statement **[AS-098]** includes local policy accordance tables, including local and neighbourhood plans. As outlined in the conclusion of the Planning Statement **[AS-098]**, the Proposed Development will help meet the urgent need for infrastructure to support "energy objectives, together with the national security, economic, commercial, and net zero benefits" as set out in NPS EN-1. It is infrastructure defined as being of critical national importance. The substantial benefits of the Proposed Development clearly and demonstrably outweigh the harms that would arise with the proposed mitigation measures in place. Adverse effects would be localised, short-term, temporary and/or reversible at the end of the Proposed Development's lifetime. As a result, the Proposed Development is in accordance with national energy policy, national planning policy and the relevant development plan documents when considered as a whole. None of the limited exceptions in S104(4)-(8) of the PA 2008 apply. The overall planning balance is, therefore, overwhelmingly in favour of the grant of development consent for the Proposed Development.
REP1-129	Malcolm Robert Ramsay	Constitutional Questions	At issue (as far as the current application is concerned) is the question of: a. whether it is legitimate for central government to override local government in matters of this kind; b. whether it is legitimate for a decision of this kind to be taken by a prominent member of a political party which is ideologically committed to developments of this kind; and c. whether, in the absence of expert consensus, it is legitimate, in administrative decision-making, for clearly identifiable harms to be set aside in favour of benefits that are essentially speculative.	Under s37(2) of the Planning Act 2008 (PA 2008), an application for a Development Consent Order (DCO) must be made to the Secretary of State. Under s31 of the PA 2008, a DCO is required for development which is, or forms part of, a Nationally Significant Infrastructure Project (NSIP). Under s14(a), s15(1) and s15(2) of the PA 2008, as the Proposed Development comprises the construction, operation (including maintenance) and decommissioning of an onshore generating station in England with a capacity exceeding 50MW, the criteria for an NSIP are met. Therefore the DCO Application will be determined by the Secretary of State. The Applicant has no control over the level at which the DCO Application is determined or the individuals involved in the determination of the application, and therefore, cannot comment further on this matter.

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				As set out in the Nationally Significant Infrastructure Projects: Advice for submitting representations or comments, the Examining Authority will read and consider all comments received. NKDC and LCC are the host authorities and have the opportunity to prepare a Local Impact Report which will also be considered by the Secretary of State in determining the DCO Application.
REP1-102	Thomas Brian Fenn	Planning Policy	It is obvious from reviewing the FGE plans, including the LVIA and NKDC LIR that the environmental impacts have not been thorough enough in the consideration and require significant amendment to achieve compliance. Furthermore, I see little evidence of local resident collaboration which is a major requirement of EN-3.	The Applicant has sought to minimise landscape and visual impacts of the Proposed Development in its pursuit of securing good design as set out in the Design Approach Document **[APP-186]**. The Applicant acknowledges that there would be some adverse landscape and visual effects resulting from the Proposed Development, as detailed within Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**, but considers that some impact is inevitable. This is also reflected in the Overarching NPS for Energy (NPS EN-1), paragraph 5.10.5 which states that “virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.” Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** demonstrates that significant landscape and visual effects would predominantly be in the short to medium term during construction and the early years of operation while planting matures. For example, there are no significant long term visual effects anticipated on residents of local villages as, by year 15 of operation, the proposed landscaping would have matured such that views of solar PV infrastructure within the Site would be screened. The design presented at Application stage represents the outcome of several design iterations, including feedback from Non-Statutory and Statutory Consultation, ongoing technical engagement with stakeholders, discussions with landowners and the outcomes of environmental assessment. The Applicant went beyond the procedural requirements and engaged early in the development process allowing for the consideration of feedback at a formative stage. Both a non-statutory and statutory consultation were held, as well as a community liaison group meeting, meetings with landowners and meetings with other interested parties. The Applicant has a duty to and has taken into account all responses to the Non-Statutory and Statutory consultation. The Consultation Report **[APP-023]**, and specifically Chapter 10 and Chapter 11 of the report, explains how the Applicant has had regard to consultation responses. The consultation process was designed to engage with the local communities which may be most affected by the Proposed Development. The Applicant defined a Core Consultation Zone of 3 km from the site which received a direct mailing at each consultation and a Wider Consultation

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				Zone of 5 km from the site. This was to reach interested individuals or parties who were not only within the Core Consultation Zone. The Applicant also consulted with stakeholders including elected representatives, seldom heard groups, landowners, community organisations and statutory stakeholders as defined in s42 of the Planning Act 2008. The Applicant used a range of methods to share information about the proposals and to reach different audiences. This included digital methods - a project website, holding webinars and hosting online feedback forms, as well as holding in-person events and sending hard-copy letters to residents and other stakeholders. The consultation process was open to anyone who wished to take part and feedback could be given by letter, feedback form or email. Following submission of the DCO application the Applicant's website remains open and includes information on how to get in touch with the Applicant to share their views. Submitting Relevant Representations allows individuals to become "interested parties" for the purposes of the Examination to enable them to continue have their say in relation to the DCO Application. The Planning Inspectorate, upon receipt of the DCO Application, was required to consider whether the Applicant had carried out adequate consultation in accordance with legislative requirements. The Planning Inspectorate invited the relevant local authorities to submit an adequacy of consultation response – these can be found within the Fosse Green Energy Examination Library at AoC-001 to AoC-013. The acceptance of the DCO Application for examination confirms that it is considered that adequate and compliance consultation has been undertaken.
REP1-091, REP!-106, REP1-108, REP1-111, REP1-134	Ruth Abrahams, Andrew Keeling, Marc Williams, Philip John Heard, Anne Heard	Lack of Available Grid Connection	There should be a nearby existing grid connection, which there is not. Comment that an NSIP should not depend on a separate, unconsented substation. How can the Applicant have 'achieved' a Gate 2? A Gate 2 requires a confirmed connection date, confirmed point of connection and a queue position; how can this be achieved in the absence of a planning approved substation? The Applicant has failed to acknowledge that environmental impacts may tip the planning balance against the granting of planning permission for the Navenby substation	There is no requirement to have a grid connection or even to have secured a grid connection prior to making a DCO application. Paragraph 4.11.6 of NPS EN-1 explains that it is open to operators without a grid connection to make a DCO application and provide information in the application to demonstrate that there is no obvious reason why a network connection would not be possible. However, the Grid Connection Statement **[APP-200]** confirms that the Applicant has secured a connection to the proposed National Grid substation near Navenby. Whilst it is acknowledged there is no planning permission for the proposed substation at the time of writing, given the generally supportive national and local policy position, and on the basis that National Grid Electricity Transmission (NGET) take a responsible approach to siting, design and mitigation, in compliance with the 'Horlock Rules', there are no obvious reasons known to the Applicant why planning permission for the Navenby substation and associated overhead lines to connect it into the national grid would not be granted. NGET has stated to the Applicant that should consent not be granted the fall back is to appeal any such refusal to the Secretary of State and await determination. Under the commercial agreement between the Applicant and NGET, should no new substation at Navenby be available, it would fall to NGET to find an alternative point of connection for the Proposed Development.
REP1-091	Ruth Abrahams	Whisby Quarry Expansion	The planning application from Tarmac to substantially extend their existing operations at Whisby Quarry (LCC Planning Application EIA/02/25) will take up a large area to the west and north west of Tunman Wood and should also be taken into account when considering the cumulative effect of industrialisation for TOTH and its immediate surroundings.	The Applicant acknowledges a Scoping Opinion has been issued for the expansion of Whisby Quarry in July 2025. At the time of writing, there is no planning application submitted for these works. Cumulative effects for the Proposed Development are considered in Chapter 15 Cumulative Effects and Interactions of the ES **[APP-040]**. It is the Applicant's understanding that this is a new proposal, which was not identified by the Applicant and NKDC at the time of preparing the DCO application. The scheme is approximately 800m northwest of the Order limits and therefore sufficiently far from the Scheme that there would not be expected to

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				be significant cumulative effects on noise and vibration, air quality and dust, landscape and visual, archaeology and heritage, ecology, and other matters. There is the potential for overlap of road trips from the Proposed Development and the proposed quarry expansion to use the same road links, however there is not currently sufficient information associated with the proposed quarry expansion to assess this. Figure 13-4 **[AS-072]** shows that the HGV routes for the Proposed Development avoid any routes west of the A46 and therefore it is expected that this is the only road link where cumulative effects may occur. Given the capacity of the A46 and negligible effect identified on this road link attributed to the Proposed Development (Chapter 13 Traffic and Transport **[APP-038]**), it is not anticipated there would be any significant cumulative effects from traffic.
REP1-096 REP1-135	Michael Campbell, Mark Wheater	Compliance with NPS	In accordance with EN1 (Overarching National Policy Statement for Energy) the developer should take measures to reduce, mitigate and avoid any adverse impacts by applying good design principles in accordance with the NPS. NPS EN-3 states that proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/colocation with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage. This has not been complied with due to the severe impact on local historical villages and their communities. Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible during construction, and in particular, during operation of the site. This has not been considered and therefore is a major non-compliance. Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape. This has only been considered with a view to screening the solar panels rather than considering the historical visual impact on the village recreational amenity “public rights of way” circular footpath. Applicants should carry out a landscape and visual assessment (LVIA) and report it in the ES. Photomontage visualisations may be required to demonstrate the effects of a proposed solar far, on sensitive or valued landscapes, particularly designated landscapes, the setting of heritage assets and any nearby residential areas or viewpoints. LVIA Currently completed with major deficiencies identified.	The Proposed Development design has been informed by staged assessment work in order to remove or reduce potential impacts upon heritage assets, and reflects a proactive approach to identifying, assessing and mitigating impacts (please refer to Chapter 7: Cultural Heritage of the ES **[APP-032]**, and relevant Appendices, especially Appendix 7-B Cultural Heritage Desk Based Assessment **[APP-125]**, Appendix 7-D Detailed Heritage Asset Setting Assessment **[APP-127]**, and Appendix 7-E Historic Landscape Character Assessment **[APP-128]**). As a result, feasible mitigation measures were included in the design (embedded mitigation), including removal of panels from certain areas or planting to reduce visibility, ensuring no significant effects upon built heritage assets would be incurred, which is summarised within Chapter 7: Cultural Heritage of the ES **[APP-032]**. The Applicant has sought to minimise landscape and visual impacts of the Proposed Development in its pursuit of securing good design as set out in the Design Approach Document **[APP-186]**. The Applicant acknowledges that there would be some adverse landscape and visual effects resulting from the Proposed Development, as detailed within ES Chapter 10: Landscape and Visual Amenity **[AS-117]**, but considers that some impact is inevitable. This is also reflected in the Overarching NPS for Energy (EN-1), paragraph 5.10.5 which states that “virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.” Chapter 11: Noise and Vibration of the ES **[APP-036]** assesses the construction, operational and decommissioning noise impacts of the Proposed Development. It describes the embedded mitigation measures included in the Proposed Development and, with the commitments to minimise noise made within the Framework CEMP **[APP-189]**, Framework OEMP **[REP1-033]** and Framework DEMP **[REP1-035]**, does not identify any significant adverse noise effects as a result of the Proposed Development. The framework plans noted above are to be developed into detailed plans, substantially in accordance with the framework plans, secured under Requirements 12, 13 and 20, respectively, of the Draft DCO **[REP1-007]**. The potential for impact of Noise and Vibration on wildlife is assessed in Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]** with no significant adverse effects identified during

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			Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes. This is not the case with the current proposal and therefore non-compliant. Above ground impacts may include the effects on the setting of Listed Buildings and other designated heritage assets as well as on Historic Landscape Character. The Historic character of Thorpe on the Hill and PRoW will be impacted and therefore the plans are noncompliant.	construction, operation or decommissioning of the Proposed Development. More widely for ecology, Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]** identified no significant adverse effects upon ecological receptors as a result of the construction, operation and decommissioning of the Proposed Development. Significant beneficial effects will be established during operation upon a variety of habitat types (including woodland, grassland and hedgerows), for example new hedgerow planting and bolstering of existing defunct hedgerows will increase connectivity across the Order Limits for species such as bats. Additional grassland and conservation margins provided adjacent to and beneath the solar PV panels in the Principal Site, and larger permanent grassland fields, including in arable field margin in retained arable fields, will increase the diversity of flora in comparison to existing intensive agriculture and provide new habitat niches to encourage fauna such as invertebrates and birds. The Design Approach Document **[APP-186]** demonstrates that that the design of the Proposed Development does recognise and consider opportunities for increased connectivity, including measures to minimise disruption to PRoW during construction, operation (including maintenance) and decommissioning where practicable. Enhancement measures have also been explored which includes the provision of permissive paths across the Site to supplement the existing PRoW network, link existing routes. create new connections to surrounding villages and enhance existing connections. Visual impacts on the PRoW network have been considered in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The siting of solar PV panels and associated infrastructure seeks to minimise instances of any elements of the Proposed Development being located on both sides of any PRoW. Where the provision of solar PV panels or associated infrastructure is proposed adjacent to a PRoW, an offset of a minimum of 10m either side of the centre line has been incorporated. Where the provision of solar PV panels or associated infrastructure is proposed on both sides of a PRoW, sections of wider offsets have also been integrated to avoid a ‘canyon effect’ and vary the extent of views experienced across the Principal Site where practicable. This is secured as a Design Commitment set out in Appendix A: Design Commitments of the Design Approach Document **[APP-186]** which are secured under Requirement 6 (detailed design approval) of Schedule 2 of the Draft DCO **[REP1-007]**. Photomontages (see ES Figure 10-10 Photomontages **[APP-097, AS-119]**) have been prepared to inform the visual assessment undertaken in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]** - these photomontages demonstrate how the visual impact at relevant receptors reduces over time as the proposed landscaping matures. The Proposed Development is not located within, or within the setting of, any nationally designated landscapes.

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				Whilst there are no Scheduled Monuments, Listed Buildings, Conservation Areas, or other designated heritage assets located within the Order Limits, as reported in Chapter 7: Cultural Heritage of the ES **[APP-032]**, it is acknowledged that within 3km of the Order Limits there are 123 designated heritage assets. This comprises five Scheduled Monuments, 114 listed buildings (seven grade I, six grade II* and 101 grade II), three conservation areas, and one grade II registered park and garden. As set out in the Planning Statement **[AS-098]**, the Proposed Development would lead to less than substantial harm (at the lower end of the scale) to two designated heritage assets and one non-designated heritage asset. However, it has been demonstrated that the substantial benefits of the Proposed Development outweigh the harm to these assets and as a result, the Proposed Development is in accordance with paragraph 5.9.32 of NPS EN-1 which states "Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal". It should be noted that the effects would be both temporary and reversible, albeit long term.
Noise and Vibration				
REP1-091	Ruth Abrahams	Noise, dust and traffic impacts	There will be a lot of noise, dust and traffic for a number of years, and then ongoing work to maintain and replace damaged or degraded panels and batteries.	With regards to noise, Chapter 11: Noise and Vibration **[APP-036]** of the ES assesses the potential noise impacts during construction, operation and decommissioning as a result of the Proposed Development; the ES chapter describes the embedded mitigation measures to be implemented and, with the commitments to minimise noise made within the Framework CEMP **[APP-189]**, Framework OEMP **[REP1-033]** and Framework DEMP **[REP1-035]**, does not identify any significant adverse residual noise effects. It should be noted that whilst the potential for significant vibration effects at three receptors (R26, R35 and R50 – see paragraph 11.9.2) during construction is identified in Chapter 11: Noise and Vibration of the ES **[APP-036]**, this assessment is based on worst-case parameters and are likely to over-estimate vibration levels. If driven piling is to be undertaken, a commitment is included in the Framework CEMP **[APP189]** (ref. NV-C1) to undertake a construction vibration risk assessment such that significant effects would be avoided. If it is unavoidable that the relevant levels would be exceeded, the risk assessment would focus on limiting the exposure of nearby receptors to levels of vibration exceeding the relevant thresholds as far as reasonably practicable. Furthermore, the timing of any driven piling within 60m of residential receptors will be delayed until after 10am to avoid more sensitive time periods. Again, these significant effects would only occur for the short-term duration during which the driven piling works (if undertaken) are happening near to these residences. Management and mitigation measures have been included within the Framework CEMP **[APP-189]** to minimise these impacts as far as practical. The provision of a detailed CEMP, which is to be substantially in accordance with the framework plan, is secured via Requirement 12 of the Draft DCO **[REP1-007]**. The maintenance and replacement of panels and batteries during the lifetime of the Proposed Development would be a small-scale exercise in comparison to the construction activity. Therefore, associated temporary noise impacts are expected to be isolated, minimal and below those identified for construction.

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				With regards to traffic, the assessment of the potential effects relating to additional construction traffic is carried out within Chapter 13: Traffic and Transport of the ES **[APP-038]**. This concludes that the Proposed Development is not expected to result in any significant effects with the proposed embedded mitigation in place, as secured by the Framework CTMP **[REP1-043]**. This is agreed by LCC who state in paragraph 11.18 of their Local Impact Report **[REP1-053]** (that *"Subject to the necessary mitigations being secured and implemented, the Council concludes that traffic and transport impacts of this development during all phases of the development would be neutral."* During general operation and maintenance, the Proposed Development is expected to generate a very low level of vehicle trips (up to four permanent staff per day) and around two visitors per week. Staff vehicles and those used for maintenance will be four wheeled drive vehicles and vans, with HGVs rarely accessing the site. During the proposed 60-year operational life of the Proposed Development, site-wide replacement of the solar PV panels, inverters, batteries and other equipment may be required in line with the design life of these components. This will be planned to occur in stages, which means that replacement activities will be of much lower intensity compared to the construction phase. Site-wide equipment replacement activities are expected to generate in the order of 20 HGVs (or 40 two-way HGV movements) per day and in the order of 20 staff car trips (40 two-way movements) per day. This is much lower than the vehicle trips generated during the peak construction phase. Regarding dust and air quality, potential impacts during construction are assessed in Chapter 14 Other Environmental Topics of the ES **[APP-039]**, Section 14.2: Air Quality. With the embedded mitigation measures identified within Section 14.2: Air Quality (paragraph 14.2.50 onwards) of Chapter 14: Other Environmental Topics of the ES **[APP-039]** and additional measures (such as the development and implementation of a Dust Management Plan) which are secured through the Framework CEMP **[REP1-031]** (ref. AQ-C1), Framework OEMP **[REP1-033]** (ref. AQ-O1) and Framework DEMP **[REP1-035]**, (ref. AQ-D1), significant adverse effects regarding air quality are not expected during construction, operation or decommissioning. Production of a detailed CEMP, OEMP and DEMP, which are to be developed substantially in accordance with the Framework plans, will be secured under Requirements 12, 13 and 20 of the Draft DCO **[REP1-007]** respectively.
REP1-108, REP1-106	Philip John Heard, Anne Heard	Noise and Vibration Impacts	The Applicant dismisses significant adverse effects (impacts to health arising from noise and vibration) during construction and decommissioning due to them being temporary. Even with the proposed mitigation, the entire construction and decommissioning periods will be hell for local communities. Moreover, the constant noise to close receptors during 60	The assessment of construction noise and vibration, as reported in Chapter 11: Noise and Vibration of the ES **[APP-036]**, does not dismiss the possibility of significant adverse effects from construction and decommissioning activity due to their temporary nature. Levels above which significant adverse effects from construction/decommissioning noise and vibration would occur are provided in Table 11-7 and Table 11-8 respectively. It is merely the case that the mitigation

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			years of operation cannot be considered anything other than significant; the quiet, tranquil PRoWs will have constat noise which cannot be deemed transitory given that a number of PRoWs connect to form circular routes. Whilst the users are the PRoW are “transient”, their experience of the use and enjoyment of the PRoW will be destroyed by noise and disturbance along the route of the walks, arising from the proposed development. The Applicant has failed to consider this impact given the World Health Organisation guidelines which advises that existing quiet outdoor areas should be preserved.	measures committed to in Table 3.7 of the Framework CEMP **[APP-189]** and Table 3.7 of the Framework DEMP **[REP1-035]** are designed to ensure such levels are not exceeded. The provision of a detailed CEMP and detailed DEMP, which will be substantially in accordance with the respective frameworks, is secured via Requirement 12 and 20 (respectively) of the Draft DCO **[REP1-007]**. While it is acknowledged that there will be an increased level of noise on certain PRoWs during the construction period, levels such as those presented in Table 11-14 of Chapter 11: Noise and Vibration of the ES **[APP-036]** would be isolated both spatially and temporally as construction activity moves across the Order Limits. As such a material change in the experience of using the PRoW as a whole as a result of noise emissions from the Proposed Development, which could affect PRoW and users’ health or quality of life, is not anticipated. Therefore, an assessment of noise effects on PRoW users as a result of the Proposed Development was scoped out, in line with the list of proposed receptors to be included in the noise assessment presented in the Appendix 1-A: EIA Scoping Report **[APP-118]** and as agreed with NKDC’s Environmental Health Officer. The Noise Policy Statement for England (NPSE) 24 provides a means for noise effects to be identified. It allows for adverse effects on health and quality of life to occur where all reasonable steps have been taken to reduce these effects whilst taking into account sustainable development. In accordance with the NPSE, all reasonable steps to minimise the effects of noise on PRoW users will be taken during the construction, operational and decommissioning phases of the Proposed Development. This includes measures such as the implementation of Best Practice Measures (BPM) during the construction phase (ref. NV-C1 of the Framework CEMP **[APP-189]**). These measures are set out in the Framework CEMP **[APP-189]**, Framework DEMP **[REP1-035]**, and Framework OEMP **[REP1-033]** submitted alongside the DCO Application. The production of detailed versions of the CEMP and the DEMP prior to the commencement of the construction and decommissioning of the Proposed Development is secured under the Draft DCO **[REP1-007]** as detailed above. The provision of a detailed OEMP, to be substantially in accordance with the framework plan, is secured under Requirement 13 of the Draft DCO **[REP1-007]** and in line with the provision of the CEMP and DEMP referred to above, will be produced prior to the commencement of the operational phase of the Proposed Development. With regards to potential impacts of activities during the operational phase of the Proposed Development (i.e. as a result of maintenance works), this is considered in paragraphs 11.7.47 – 11.7.49 of Chapter 11: Noise and Vibration of the ES **[APP-036]**. Noise and vibration levels during maintenance works are established to be comparable to those during the decommissioning phase, and consequently noise and vibration effects during maintenance works would be not significant. With reference to the WHO Guidelines on Community Noise, paragraph 11.4.64 of Chapter 11: Noise and Vibration of the ES **[APP-036]** specifies the use of this guidance within the assessment.
REP1-106	Anne Heard	St Michael’s Church	The Applicant has failed to consider the impact of noise from construction activities associated with the proposed development within the churchyard.	The Applicant assessed the impact of construction and operational noise on Saint Michael and All Angels Church within Chapter 11: Noise and Vibration of the ES **[APP-036]**. The assessment identified Sait Michael and All Angels Church as a non-residential noise sensitive receptor (R8) within the Study Area. Design criterion

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				from BS 8233: 2014 for place of worship, counselling, meditation or relaxation was applied. The assessment concludes that whilst construction noise levels of up to 65 dB LAeq,T are predicted, it is not anticipated that desirable internal noise levels would be exceeded. However, as construction noise predictions are on the threshold of significance, consultation will be undertaken with the church to make sure that the timings of piling for Solar PV Mounting Structures avoid any periods when the church may be particularly sensitive to noise, as secured through the DCO as part of the Framework CEMP **[AS-XXX]**. Chapter 11: Noise and Vibration of the ES **[APP-036]** concluded that there would be no residual significant adverse effects at Saint Michael and All Angels Church during construction, nor operation (both of the centralised and distributed BESS).
Cultural Heritage				
REP1-119	Susan Mackintosh-Sanders	Heritage Impact on Coleby	I am concerned that the proposed grid connection corridor impacts upon the village setting of Coleby, a conservation village, with far reaching views over the Lincoln Cliff Edge. Construction will severely impact upon heritage sites such as Somerton Castle and the Long Distance Footpath, The Viking Way, which celebrates 50 years this year.	With regard to the Lincoln Cliff villages (i.e. Coleby or Boothby Graffoe), those are located in the proximity of the Cable Corridor and c. 4-5km from the nearest solar panels. The cable is proposed below ground and as such would not change the setting or affect the heritage significance of assets in those villages. With regard to potential impacts upon assets in the vicinity of the Cable Corridor, including Somerton Castle, the same applies, with the cable is proposed below ground and as such would not change the setting or affect the heritage significance of assets in this area. This was confirmed through consultation with Historic England, confirming there would be no effects on designated heritage assets from construction work along the Cable Corridor and those assets were scoped out of detailed assessment (initial consideration is presented in Appendix 7-D Detailed Heritage Asset Setting Assessment **[APP127]** and summary of consultations with Historic England in Chapter 7: Cultural Heritage of the ES **[APP-032]**).
REP1-106	Anne Heard	Setting of Bassingham Conservation Area	The Applicant's assessment of the impact of the proposals on Bassingham Conservation Area does not consider the change in character of the arable fields which is an important element of the description of the Conservation Area set out in the Bassingham Conservation Appraisal Document. The proposals will have a major impact to the setting of Bassingham Conservation Area and there will be substantial harm to this heritage asset.	With regard to Bassingham Conservation Area, this was the subject to detailed assessment within Appendix 7-D Detailed Heritage Asset Setting Assessment **[APP-127]** taking into account the contribution of the setting to the heritage significance of the asset and the impacts from the Proposed Development. This assessment concluded that, whilst the introduction of solar panels will constitute a change to part of the Conservation Area's setting, this change will not alter the perception, interpretation and intelligibility of the Conservation Area as a historic rural settlement in a way which would harm its special historic and architectural interest, and as such no harm was found.
Ecology and Nature Conservation				
REP1-106	Anne Heard	Impact on Bats	There is no evidence that the proposal by the Applicant to provide embedded mitigation and habitat compensation and enhancement will result in a negligible impact on the bats from the proposed development in EIA terms. Biodiversity mitigation strategies have failed.	It should be noted that the assessment presented in Chapter 8 Ecology and Nature Conservation of the ES **[REP1-019]** identified no significant adverse effects upon ecological receptors as a result of the construction, operation and decommissioning of the Proposed Development. Significant beneficial effects will be established during operation upon a variety of habitat types (including woodland, grassland and hedgerows), for example new hedgerow planting and bolstering of existing defunct hedgerows will increase connectivity across the Order Limits for species such as bats. Additional grassland and conservation margins provided adjacent to and beneath the solar PV panels in the Principal Site, and larger permanent grassland fields, including in arable field margin in retained arable fields, will increase the

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				diversity of flora in comparison to existing intensive agriculture and provide new habitat niches to encourage fauna such as invertebrates and birds.
Public Rights of Way (PROW)				
REP1-091	Ruth Abrahams	Permissive Paths	There is no guarantee that any new permissive path will stay open.	The permissive paths are secured in Requirement 17: Permissive paths and Requirement 8: Landscape and ecological management plan as set out in the Draft DCO **[REP1-007]** and in the Streets, Rights of Way and Access Plans **[AS-106]**.
REP1-091, REP1-117	Ruth Abrahams, Anthony Magri	'Stepping Out' route in Thorpe on the Hill	The suggestion put forward to preserve some of the fields close to TOTH and which border the local Stepping Out route is a very reasonable compromise which would alleviate some of the concern and upset, for residents of TOTH and for those in the wider area who also regularly use these paths. Since the current design has overplanting of panels at a 1.59 ratio there would seem to be a great deal of leeway for the applicant to change the design to preserve the Stepping Out route in TOTH and to significantly mitigate the view issues, both from the village of TOTH and looking back towards TOTH from the Stepping Out route. It is possible to see Lincoln Cathedral from this route (spectacular at night when the Cathedral is lit up) and I fear the insertion of panels would cut off our link to a building which has huge cultural and historic significance. Fencing and screening would not be mitigation as the height of both will be at least 2 metres.	Changes to the design have been made in the vicinity of Thorpe on the Hill in response to feedback received from Thorpe on the Hill Parish Council and local residents during statutory consultation to reduce the impact of the Proposed Development. This has included the removal of solar PV within the field south-east of Thorpe on the Hill, which is now an area of managed arable fields for bird mitigation purposes (i.e. no solar infrastructure proposed), to increase the distance from the village to the Proposed Development itself, and providing additional vegetation screening along Fosse Lane. As such, the Proposed Development design provides a 300m buffer between the proposed solar infrastructure and residential receptors in Thorpe on the Hill. See Figure 3-2A of the ES **[AS-022]** and the Framework LEMP **[REP1-039]** for details. The Design Approach Document **[APP-186]** provides further details of all the design changes made in response to responses made to non-statutory and statutory consultation, the outcomes of environmental assessment and national and local planning policy. The Applicant has responded in detail regarding the impacts to the 'Stepping Out' routes within the **Applicant's Response to Local Impact Reports [EN010154/APP/9.10]**. Consideration of the Stepping Out route within Thorpe on the Hill, in the context of the PRoW network, is set out below: • Thorpe on the Hill & Tunman Wood: This is a 3-mile (4.5 km) circular walk starting from the village of Thorpe on the Hill. The walk intersects with several PRoW within the Thorpe on the Hill parish PRoW network, which includes multiple designated footpaths and bridleways. The following PRoW are understood to be used along the route: LL|TOTH|7/3, LL|TOTH|7/2#2 and LL|TOTH|7/2#1. • It is important to note that not all sections of these routes follow PRoW. For example, Tunman Wood incorporates permissive (non-statutory) recreational paths rather than formal PRoW, and is therefore assessed as a recreational asset within Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**. Potential impacts on PRoWs, including those that coincide with promoted walking routes, are assessed in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**. The assessment treats PRoWs as part of the local recreational resource and assesses both temporary and permanent impacts arising from construction, operation and decommissioning. Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** identifies the baseline PRoW network, confirming the presence of 36 PRoWs and seven permissive paths within the Principal Site, as well as 26 PRoWs running either adjacent to or in close proximity to the Order Limits (paragraphs 12.5.30–12.5.32). This includes PRoW used by the three Stepping Out routes.

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				The assessment focuses on PRoW because they form the legally defined access network and provide consistent, comprehensive baseline data for assessing impacts on journey length, travel patterns and access opportunities, whereas Stepping Out routes are not statutory designations but are made up of existing PRoW and permissive paths. Assessing PRoW therefore inherently captures any effects on Stepping Out routes without needing a separate assessment. As all PRoW within 500 m of the DCO Site were included, this approach fully encompasses the Stepping Out network where it overlaps with PRoWs, ensuring a robust, proportionate and policy-aligned assessment. The Framework PRoWMP **[APP-195]** outlines how the Applicant will manage PRoW within the Order Limits to ensure they have been suitably considered and will continue to operate effectively throughout the construction, operation (including maintenance) and decommissioning of the Proposed Development. The Framework PRoWMP **[APP-195]** reviews both user safety and accessibility, during the complete life cycle of the Proposed Development, considering the potential interaction and impact on the PRoW associated with the construction works, as well as the day-to-day operation of the Proposed Development. Visual impacts on the PRoW network have been considered in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The siting of solar PV panels and associated infrastructure seeks to minimise instances of development on both sides of PRoW. Fencing around the Order Limits will be a 'stock proof fence' (i.e., wooden posts and metal wire mesh) and will be up to 2m in height. Palisade fencing will only be utilised around the perimeter of the BESS compounds (Work No. 2 and 3), and the Onsite Substation (Work No. 4) and will be up to 2.5m in height and painted in a muted colour sympathetic to the surrounding environment. Where development is proposed adjacent to a PRoW, there will be a minimum offset of 10m from the centre line (minimum 20m total). Where development is proposed on both sides of a PRoW, sections of wider offsets reflecting local features, such as hedgerows, will be integrated to vary the extent of views experienced across the Principal Site, where practicable. These buffers are secured by Requirement 6: Detailed design approval as set out in the Draft DCO **[REP1-007]**. Additionally, as noted in the Framework LEMP **[REP1-039]** (ref. paragraph 6.1.4), to be secured by Requirement 8 and 17 under Schedule 2 of the Draft DCO **[REP1-007]**, a permissive path network, totalling approximately 9.5km, will be implemented providing routes across the Principal Site and enhancing the recreational value of the Order Limits (see Figure 3-3 Proposed Permissive Path Plan of the ES **[AS-024]** and the Framework PRoWMP **[APP-195]** for further details). These will supplement the existing PRoW network, linking together existing walking routes, increasing connectivity and creating enhanced connections to surrounding villages. The proposed permissive path network has evolved following feedback at the statutory consultation stage, as explained in Chapter 4 Alternatives and Design Evolution of the ES **[APP-029]**, providing more effective linkages across the site. These permissive paths include: new connections around Cathedral Park; a new connection at Tunman Wood; a new connection at Thurlby; and a new circular route to the west of Bassingham. These permissive paths are secured in Requirement 17: Permissive paths and Requirement 8: Landscape and

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				ecological management plan as set out in the Draft DCO **[REP1-007]** and secured in the Streets, Rights of Way and Access Plans **[AS-106]**.
REP1-096	Michael Campbell	Loss of PROW	The proposed loss of in excess of 30 public footpaths is totally unacceptable as is the “tunnelling” effect of the created corridors and the loss of our open landscape.	Potential impacts on PRoW are assessed in Chapter 12: Socio-economics and Land Use of the ES **[AS-016]** (ref. paragraphs 12.7.29 – 12.7.35). There are 36 PRoW and seven permissive paths located within the Principal Site, as well as 26 PRoW which run alongside the boundary or are within close proximity to the Principal Site. Furthermore, there are five PRoW which could be impacted by the Cable Corridor. The Proposed Development would require the permanent diversion of three PRoW, each of which is assessed to result in a negligible effect, which is considered not significant. Some PRoW may need to be temporarily closed to facilitate the safe construction of the Proposed Development. Where a PRoW is proposed for temporary closure, a diversion route has been proposed for the duration of the closure, with the original PRoW to be fully reinstated upon completion of the relevant works. The Streets Rights of Way and Access Plans **[AS-106]** show each proposed temporary PRoW closure, as well as the corresponding proposed indicative location of temporary PRoW diversion. The Framework PRoWMP **[APP195]** outlines how the Applicant will manage PRoW within the Order Limits to ensure they have been suitably considered and will continue to operate effectively throughout the construction, operation and decommissioning of the Proposed Development. The Framework PRoWMP **[APP-195]** reviews both user safety and accessibility, during the complete life cycle of the Proposed Development, considering the potential interaction and impact on the PRoW associated with the construction works, as well as the day-to-day operation of the Proposed Development. Fencing around the Order Limits will be a 'stock proof fence’ (i.e., wooden posts and metal wire mesh) and will be up to 2m in height. Palisade fencing will only be utilised around the perimeter of the BESS compounds (Work No. 2 and 3), and the Onsite Substation (Work No. 4) and will be up to 2.5m in height and painted in a muted colour sympathetic to the surrounding environment. Where development is proposed adjacent to a PRoW, there will be a minimum offset of 10m from the centre line (minimum 20m total). Where development is proposed on both sides of a PRoW, sections of wider offsets reflecting local features, such as hedgerows, will be integrated to vary the extent of views experienced across the Principal Site, where practicable. These buffers are secured by Requirement 6: Detailed design approval as set out in the Draft DCO **[REP1-007]**. With regards to tunnelling/channelling, Section 3.5 the Framework PRoW-MP **[APP-195]** outlines how Public Rights of Way (PRoW) will be managed within the DCO Site to ensure they have been suitably considered and will continue to operate effectively throughout the construction, operation and decommissioning of the Proposed Development. Paragraph 3.5.2 of the Framework PRoW-MP **[APP-195]** sets out that during the operational phase, the Applicant will maintain access to all existing PRoW within the DCO Site, with existing width retained, if not increased. There will be at least 5 metres spacing either side of the centreline of each PRoW, creating a minimum width of 10 metres, to avoid the perception of being 'channelled' into narrow passages between PV panels.
REP1-111	Andrew Keeling	Impact on PROW (Bassingham)	Concern that the Proposed Development will have a significant detrimental impact on key recreational walking routes around Bassingham and between Bassingham and Aubourn.	Visual impacts on the PRoW network have been considered in Chapter 10: Landscape and Visual Amenity of the ES **[AS-117]**. The siting of solar PV panels and associated infrastructure seeks to minimise instances of any elements of the

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			Solar panel arrays will run alongside the public footpath to the west of Bassingham that connects Thurlby Road and Church Bridge, providing a popular walk for people circumnavigating the village. Walkers using the promoted circular walk between Bassingham and Aubourn will be forced to walk very close to or through solar panel arrays, significantly detracting from the recreational experience of this route. The Applicant has made no real attempt to lessen these impacts through the design of the project and makes no effort to enhance these recreational walking opportunities, which could have been achieved through a more thoughtful design approach.	Proposed Development being located on both sides of any PRoW. Where the provision of solar PV panels or associated infrastructure is proposed adjacent to a PRoW, an offset of a minimum of 10m either side of the centre line has been incorporated. Where the provision of solar PV panels or associated infrastructure is proposed on both sides of a PRoW, sections of wider offsets have also been integrated to avoid a 'canyon effect' and vary the extent of views experienced across the Principal Site where practicable. This is secured as a Design Commitment set out in Appendix A: Design Commitments of the Design Approach Document **[APP-186]** which are secured under Requirement 6 (detailed design approval) of Schedule 2 of the Draft DCO **[REP1-007]**. The Design Approach Document **[APP-186]** demonstrates that that the design of the Proposed Development does recognise and consider opportunities for increased connectivity, including measures to minimise disruption to PRoW during construction, operation (including maintenance) and decommissioning where practicable. Enhancement measures have also been explored which includes the provision of permissive paths across the Site to supplement the existing PRoW network, link existing routes. create new connections to surrounding villages and enhance existing connections. The Proposed Development will create approximately 9.5km of new permissive paths across the Principal Site including: • Route from Tunman Wood linking to PRoW LL/TOTH/11/1 to the east of Morton. • Route from Tunman Wood to Fosse Lane including a link to the Cathedral View Caravan Park linking with PRoW LL/TOTH/6A/1. • Cathedral View Caravan Park to Fosse Lane, providing a circular walk and safer route and access to Thorpe-on-the-Hill for residents. • East of Witham St Hughs, providing a circular walk around the proposed community orchard and linking to PRoW LL/AUbo/11/2. • Route south of Thurlby linking to PRoW LL/ThuN/2/1. • West of Bassingham providing a circular walk and linking to PRoW LL/NoDi/1/2. Figure 3-3: Proposed Permissive Paths of the ES **[AS-024]** and Sheets 1-5, 7 and 9 of the Streets, Right of Way and Access Plans **[AS-007]** show the location of the proposed permissive paths. The Framework LEMP **[REP1-039]**, (a detailed version of which is to be developed, substantially in accordance with the framework plan, as secured by Requirement 8 of the Draft DCO **[REP1-007]**), sets out the permissive path network will be implemented during operation of the Proposed Development providing routes across the Principal Site and enhancing the recreational value of the Order Limits. In summary, the Proposed Development will minimise operational impacts by maintaining access to all existing PRoW within the Proposed Development, with suitable alternative routes provided for the three PRoW sections that will be permanently diverted (LL/TOTH/13/1 PRoW, LL/Aubo/10/1 PRoW and LL/ThuN/2/1 PRoW) and by controlling areas where the internal maintenance route crosses any existing PRoW or local access roads (such as providing gates), permitting only operational traffic to utilise these internal routes within the Principal Site. Full details are provided in the Framework PRoWMP **[APP-195]** a detailed version of which, to substantially in accordance with the framework plan, is secured under Requirement 18 of the Draft DCO **[REP1-007]**.

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REP1-102, REP1-135	Thomas Brian Fenn, Mark Wheater	Thorpe Circular Walk	Concern that 60% or more of the Thorpe circular will become an enclosed footpath with the proposed high perimeter hedges and fencing. The screening hedges designed to obscure the solar panels, will also obscure the view and create a dark, enclosed experience, especially in the winter months. In December 2024 I did write to the Fosse Green Energy and suggested they reviewed their plans to mitigate some of the visual impacts on the internal fields of the TOTH circular walk. This could be achieved by relocating four or five of the fields current designated for solar panels to non-residential areas south of Swinderby roundabout along the A46. These could be screened from the road and would not impact the PRoW, however it seems more solar panel fields have been added to the vicinity. Furthermore, as these fields are North, North-East of the wooded area, the winter months will see varying amounts of shade from the 80 to 90ft trees, thus reducing the solar efficiency considerably.	Potential impacts on PRoWs, including those that coincide with promoted walking routes, are assessed in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**. The assessment treats PRoWs as part of the local recreational resource and assesses both temporary and permanent impacts arising from construction, operation and decommissioning. Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** identifies the baseline PRoW network, confirming the presence of 36 PRoWs and seven permissive paths within the Principal Site, as well as 26 PRoWs running either adjacent to or in close proximity to the Order Limits (paragraphs 12.5.30–12.5.32). Overall, the assessment in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]** concludes that the scale of changes to journey length, travel patterns and access opportunities is limited, and that effects on PRoW users, whether local residents or visitors, would be negligible and therefore not significant across construction, operation, and decommissioning. The proposed permissive path network has evolved following feedback at the statutory consultation stage, as explained in Chapter 4 Alternatives and Design Evolution of the ES **[APP029]** to maximise community benefits, providing more effective linkages across the site. Once the Proposed Development is operational there will be approximately 9.5 km of new permissive paths created, linking together existing walking routes and creating enhanced connections to surrounding villages, as well as the provision of a 1.8ha (4.4 acres) new community orchard with open access within the landscaping designs, offering a direct benefit for the local community. The Framework LEMP **[REP1-039]**, a detailed version of which is to be developed, substantially in accordance with the framework plan, as secured by Requirement 8 of the Draft DCO **[REP1-007]**, sets out the permissive path network will be implemented during operation of the Proposed Development providing routes across the Principal Site and enhancing the recreational value of the Order Limits.
REP1-106	Anne Heard	ALC Discrepancy	Table 12.15 of Chapter 12 Socio Economics and Land Use (AS-016) sets out the distribution of Agricultural Land Classification grades within the Principal Site. In addition to a small area of 18.4 ha that was not surveyed and 15 ha of non agricultural land, the table states that there are 702.4 ha of non BMV land and 282.9 ha of BMV land, a total area of 1,018.7 ha. If the area of the Principal Site as set out in paragraph 2.1 above is 1070 ha, some 51.3 ha has not been accounted for in Table 12.15 (presumably this relates to the Cable Corridor within the Principal Site). The figures in Table 12-15 should be therefore be amended to include the 51.3 ha and identify the ALC grade/s of this land.	The Applicant acknowledges that there is an error in the area of land surveyed in Chapter 12 Socio Economics and Land Use (AS-016). As mentioned in other chapters in the ES, the Principal Site is 1,070ha (at the time, prior to the Change Request), not the 1,018.7ha stated in Chapter 12: Socio-Economics and Land Use of the ES **[AS-016]**. The discrepancy is with the land not available for survey (east of the Onsite Substation, illustrated on Figure 12-5 **[AS-068]**), which was added to the Cable Corridor after the ALC survey. The area that was inaccessible / not surveyed within the Principal Site was 70ha rather than the 18.4ha noted in Chapter 12. This does not affect the other numbers in Chapter 12 or therefore the conclusions of the assessment.
Consultation				
REP1-091, REP1-102, REP1-134, REP1-135	Ruth Abrahams, Thomas Brian Fenn, Marc Williams, Mark Wheater	Consideration to Consultation Feedback	The Applicant seems unwilling to make anything other than very minor changes to the design despite concerns and suggestions raised at consultations.	Engagement with the local community and with the relevant local authorities has been an integral part of development of the design of the Proposed Development. The Applicant held both Non-Statutory and Statutory Consultation where views were sought. The Consultation Report Appendices **[APP-024]** set out how the Applicant has considered feedback provided at Non-Statutory and Statutory

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			Residents, businesses and visitors should be classed as “key stakeholders” – concern that there is little evidence of any consideration with regard to the issues being raised. As stated in the enquiry it was disappointing that the developer did not enter into any pro-active dialogue re. the alternative scheme and simply responded in the application documentation rather than discussing proposals with Thorpe on the Hill residents . We would have welcomed this discussion to try and bring forward a good design and we would still be open to this.	Consultation. Furthermore, the Design Approach Document **[APP-186]** explains how the Applicant has responded to feedback provided on the design of the Proposed Development. In addition, as set out in the Consultation Report **[APP-023]**, the Applicant has been in regular communication with officers from LCC and NKDC to seek technical feedback and views on approaches to consultation amongst other matters. In summary, the Applicant has pro-actively engaged with the local community and local authorities, as demonstrated in the Consultation Report **[APP-023]** and Design Approach Document **[APP-186]**. As an example, changes to the design have been made in the vicinity of Thorpe on the Hill in response to feedback received from Thorpe on the Hill Parish Council and local residents during statutory consultation to reduce the impact of the Proposed Development. This has included the removal of solar PV within the field south-east of Thorpe on the Hill, which is now an area of managed arable fields for bird mitigation purposes (i.e. no solar infrastructure proposed), to increase the distance from the village to the Proposed Development itself, and providing additional vegetation screening along Fosse Lane. As such, the Proposed Development design provides a 300m buffer between the proposed solar infrastructure and residential receptors in Thorpe on the Hill. See Figure 3-2A of the ES **[AS-022]** and the Framework LEMP **[REP1-039]** for details. The Design Approach Document **[APP-186]** provides further details of all the design changes made in response to responses made to non-statutory and statutory consultation, the outcomes of environmental assessment and national and local planning policy.
Other Environmental Topics				
REP1-091	Ruth Abrahams	Storage of Waste	Where and how will damaged/defunct panels and batteries, or contaminated water or soil be stored pending removal to waste disposal or recycling sites? What protections are proposed for these? the Applicant intends to store waste on site, including hazardous waste. Therefore, it appears that areas within the Order Limits need to be classified as a Regulated Waste Sites for eg batteries and solar panels awaiting disposal	As detailed in the Framework CEMP **[APP-189]** paragraph 2.8.1-4: “The Principal Contractor will separate the main waste streams on-site, prior to transport to an approved, licensed third party waste management facility for recovery, recycling or disposal. A Site Waste Management Plan (SWMP) will be prepared by the Principal Contractor, which will provide a waste estimate and specify key responsibilities, reporting and auditing requirements and waste recovery targets. The SWMP will be finalised with specific measures to be implemented prior to the start of construction. All waste to be removed from the DCO Site will be undertaken by fully licensed waste carriers and taken to licensed waste facilities and managed in line with the requirements of the Waste (England and Wales) Regulations (2011) and the Hazardous Waste (England and Wales) Regulations (2005). The Proposed Development will apply the waste hierarchy, in priority order; prevention, preparation for reuse, recycled, other recovery and disposal.” The provision of a detailed CEMP, which is to be substantially in accordance with the Framework CEMP **[APP189]** is secured by Requirement 12 of Schedule 2 to the Draft DCO **[REP1-007]**.
REP1-096	Michael Campbell	Recycling Solar Panels	PV panels are nearing obsolescence and likely to be obsolete within 10–15 years. Recycling claims are vague; future disposal likely to involve contaminated industrial waste.	The ability to replace panels, where it is economical and practical to do so, part way through the lifetime of the Proposed Development allows for the implementation of any advancements in the technology to maximise the renewable generation onsite. With regards to the disposal of panels, over 95% of the solar PV infrastructure can be recycled but it is not known by the Applicant how much of the infrastructure will

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				be made from recycled materials. The procurement process will only begin after consent and during detailed design stage, at which stage this level of detail may become known. The Applicant is committed to ethical supply and has prepared a Framework ESSCP **[APP-197]**. As stated in the Materials and Waste section of ES Chapter 14: Other Environmental Topics **[APP-039]**, the Proposed Development will aim to prioritise waste prevention, by preparing for reuse, recycling and recovery and lastly disposal to landfill as per the waste hierarchy. The anticipated waste streams during decommissioning are set out in Table 14-7 Estimated Decommissioning Waste within ES Chapter 14: Other Environmental Topics **[APP-039]**. With the embedded mitigation measures in place, the overall quantities of decommissioning waste to be disposed of to landfill are anticipated to be below 1% of regional inert and non-hazardous landfill capacity and less than 0.1% of national hazardous landfill capacity. The assessment concludes that significant waste effects are not expected during decommissioning of the Proposed Development.
REP1-126, REP1-131, REP1-132, REP1-128	Mrs Diane Plumb, Allyson Julie Sorrell, Martin Robert Sorrell, Malcolm Robert Ramsay	Health, EMF and Nuisance	I am deeply concerned about the long-term effects of Electromagnetic Radiation (EMR) on humans and wildlife, as well as constant noise, dust during construction, and light pollution from 24-hour security systems. This application offers us years of construction, noise and disruption with a final result of what was once a rural area becoming an industrial landscape.	Section 14.8 of Chapter 14: Other Environmental Topics of the Environmental Statement **[APP-039]** provides an assessment of the potential impacts associated with electro-magnetic fields (EMF). Solar panel arrays emit EMF in the same extremely low frequency ranges as electrical appliances and wiring found in most houses and buildings. The Proposed Development would be fully compliant with relevant Government policy and all the EMFs produced would be below the relevant exposure limits and therefore no significant effects are anticipated as a result of the Proposed Development. Underground cables eliminate the electric field altogether as it is screened out by the sheath around the cable, but they still produce magnetic fields. The National Grid document 'Undergrounding high voltage electricity transmission lines' states that for a 400kV cable buried at 0.9 m depth, the typical magnetic field is 24 microteslas when on top of the cable and 3 microteslas at 5m from the centreline, with the maximum level known by National Grid being 96 microteslas on top of the cable at 0.9 m depth, and 13 microteslas at 5m. Taking into account this guidance and the UK limits set for safety of members of the public, the maximum reported electromagnetic field for High Voltage (HV) cables buried at 0.9m depth would comply with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) limits 4 and were therefore scoped out of the assessment. The Department of Energy and Climate Change's (DECC) guidance 'Power Lines: Demonstrating Compliance with EMF public exposure guidelines. A voluntary Code of Practice states that underground cables at voltages up to and including 132kV are considered not capable of exceeding the ICNIRP exposure guidelines for electromagnetic fields and that compliance with exposure guidelines for such equipment can be assumed unless evidence is brought to the contrary in specific cases. However, there is potential for exceedances of 132kV where infrastructure overlaps. The Interconnecting Cables between Solar PV areas are not considered in the assessment as they would have a very low voltage of less than 1kV and therefore would not significantly contribute to any increase in electromagnetic fields should they overlap with other infrastructure. Appendix 14-F: Electromagnetic Fields Assessment of the Environmental Statement **[APP-175]** provides further detail on the potential for EMF effects as a result of the Proposed Development.

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				The Applicant has responded to comments regarding noise in detail within **Table 7-5** (Page 265) of the **Applicant's Response to Relevant Representations [REP1-047].**
REP1-131, REP1-132	Allyson Julie Sorrell, Martin Robert Sorrell	Mental Health	The loss of peaceful outdoor recreation and the conversion of a rural landscape into an industrial zone will have a direct, negative impact on the mental health of the community.	Regarding mental health, the Applicant recognises that elements of the Proposed Development have the potential to affect mental health. To address such concerns and support the long-term wellbeing of the community, including mental health, the Proposed Development has been iteratively and holistically designed to minimise impacts on health and wellbeing through undertaking a comprehensive and robust Environmental Impact Assessment and consultation process to identify and implement beneficial design opportunities. In terms of disruption during the construction, operational and decommissioning phases, measures set out in the Framework CEMP **[APP-189]**, Framework OEMP **[REP1-033]**, Framework DEMP **[REP1-035]** and Framework LEMP **[REP1-039]** will reduce or avoid mental health related impacts. These include measures such as new planting to screen views and by reducing the amount of solar PV in Field 46 to avoid a significant visual effect from any residential dwellings during the operational lifetime of the Proposed Development. Once the Proposed Development is operational there will be approximately 9.5 km of new permissive paths created, as well as the provision of a 1.8ha (4.4 acres) new community orchard with open access within the landscaping designs, which can have a quality of life benefit for users through improving access to recreation. The framework management plans noted above are to be developed into detailed management plans, substantially in accordance with the respective frameworks, as secured under Requirements 12, 13, 20 and 8, respectively, of Schedule 2 to the Draft DCO **[REP1-007]**. It is noted that LCC are a named consultee on these Requirements, and as such will have the opportunity to review the detailed management plans prior to any approval. Furthermore, a Community Liaison Group is secured through Requirement 5 of Schedule 2 of the Draft DCO **[REP1-007]** which requires the establishment of a community liaison group prior to the commencement of the Proposed Development. Such a group has already been established by the Applicant and will continue during construction and operation. This group provides an opportunity for the local community to engage with the Applicant, learn about the detailed design post consent, express concerns, and be kept up to date. It is expected on this basis that the group will play an important role in helping to reduce/minimise stress. The Applicant is also proposing a community benefit fund, the intention of which is that this will be delivered in cooperation with local community foundations and NKDC to benefit causes chosen by the local community. The community benefit fund delivered alongside the Proposed Development will provide a sum of £400 per MW of export capacity per year. The Applicant is exploring how this could best be managed. The Applicant believes those communities living closest to the Proposed Development are best placed to determine what a community benefit would be, and should be able to benefit from funding towards improvements to existing community facilities, such as village halls and sports facilities, provision of electrical vehicle charging points, subsidised solar PV panels for community use and lower

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				cost energy, grants for broadband and wider improvements, educational visits and wider education/apprenticeship opportunities.
REP1-091, REP1-113, REP1-114	Ruth Abrahams, Gordon Kobish, Sue Kobish	Impact on health and wellbeing	Many people choose to live here because of the quiet rural character and the availability of country walks from the doorstep. Mass solar industrialisation both in construction and operational phases, will have a very negative effect on everyday life and on health and well being.	While the Proposed Development comprises infrastructure for solar energy generation and associated development (such as BESS), the land is not permanently changed to industrial use in land use planning terms, and it should be noted that the Proposed Development also includes a significant amount of retained arable land. The design of the Proposed Development has sought to minimise impacts upon agricultural land, as explained in the Design Approach Document **[APP-186]** which sets out the design vision and principles that were developed at an early stage to provide a framework for design evolution. Design Principle 2, as detailed in Section 3.9 of the Design Approach Document **[APP-186]**, relates to being sensitive to existing agricultural land. This has been achieved through the retention of a significant amount of arable land within the Order Limits (the DCO commits to 181 ha (447.2 acres) of retained arable land in the Framework LEMP **[REP1-039]**). This retained arable land (which comprises a significant proportion, approximately 116 ha, of BMV agricultural land) within the Order Limits disperses the areas of solar PV array and affords both ecological benefits associated with nesting birds' habitat and economic benefits in terms of retained jobs. It should also be noted that the Proposed Development is not a permanent installation and once the Proposed Development's operational life ends, the infrastructure will be removed, and the land returned to its previous use in accordance with the Framework DEMP **[REP1-035]**. The Applicant is applying for a 60-year operational period for the Proposed Development, whereby under Requirement 20 of the Draft Development Consent Order **[REP1-007]**, decommissioning works must commence no later than 60 years following the date of final commissioning. At the end of its operating life the land will be available for its current use, although the landowners would choose at that point how the land is to be used and managed. It is acknowledged that energy infrastructure has the potential to impact on the health and wellbeing of the population and therefore, potential effects on human health are considered as part of the EIA process. Section 6.2 of the Planning Statement **[AS-098]** considers the effects of the Proposed Development on human health in the context of planning policy.
REP1-113, REP1-114	Gordon Kobish, Sue Kobish	Distance of Solar Farms from Residential Properties	The World Health Organisation recommends that Solar Farms should be 2 miles from residential properties. FGE scheme does not comply with this WHO recommendation in many locations, both village settlements (eg. Thorpe on the Hill village itself) and isolated dwellings.	The Applicant is not aware of any World Health Organisation guidance that recommends that solar farms should be 2 miles from residential properties. The Applicant considers that the layout presented in the DCO Application represents a good design that has located infrastructure sensitively with good buffers from receptors.
REP1-115	Carl Anton John Koenan	Glint and Glare	I also contend that proper consideration has not been given to the potential impact of "Glint & Glare" in respect of both the number of panels that will be astride the A46 (forming the key entry point to Lincoln for traffic) and the proximity of RAF Waddington which is home to the Red Arrows and hosts multi-national military exercises. As a resident I have seen the various flight paths that are used on these occasions and aircraft would be flying over a vast array of solar panels at low level. As a minimum the applicant should take due	Glint and glare impacts upon military aerodromes and activity have been assessed within ES Appendix 14-D: Glint and Glare Assessment **[APP-171- APP-173]** which considers specific receptors defined by the MoD including Air Traffic Control Towers, runway approach paths and circuit paths at RAF Waddington as agreed through ongoing engagement in relation to glint and glare. The assessment concludes no significant impact is predicted upon aviation activity associated with the MoD. A SoCG with the MoD is currently being prepared (which will be submitted at the midpoint of Examination in line with the Examining Authority's request in its Procedural Decision dated 22 August 2025 **[PD-005]**) to agree this

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			consideration of NPS EN-3 Para 3.10.93 and mitigate this by conforming to Para 3.10.125 requiring the panels to have an “anti-glare and anti-reflective coating”. There is a significant risk here and this should not be ignored so the proposed panels would need to be modified to confirm with the policy.	position. The proposed solar panels will be manufactured with anti-reflective coating to optimise energy performance and to be non-reflective. As set out in Chapter 14 Other Environmental Topics of the ES **[APP-039]**, an assessment of road receptors for glint and glare was undertaken. Paragraph 14.3.20 sets out that solar reflections are theoretically possible at 215 of the 217 road receptor points assessed in the 1km Study Area, including on the A46, based on the bald-earth model. Upon reviewing the actual visibility of the receptors, glint and glare impacts remain High for 30 receptors though taking into account screening, such as field boundary hedgerows, impacts reduce to None at all receptors. Therefore, overall impacts are not significant.
The Applicant and Funding				
REP1-092	Robert Brewer	Applicant motive	Concern that large developments such as NSIPs, are owned by companies whose interests are dominated by their Holding Companies and their Shareholders to maximise profits and their project sites should be situated in commercial/industrial areas.	Fosse Green Energy Limited is a company registered in England and Wales with Companies House (Company number 13438725). It is owned by Windel Energy Ltd, a company registered in England and Wales, and Rugeley West Solar Limited, another company registered in England and Wales. Rugeley West Solar Limited is owned by CS UK Holdings III Limited which is part of Recurrent Energy which is a subsidiary of Canadian Solar Inc. Both companies have a strong UK presence, with over 100 Recurrent Energy employees in the UK. The financial position of the Applicant and the proposed funding structure for the Proposed Development is detailed within the Funding Statement **[AS-014]**. This document sets out the estimated current capital cost for the Proposed Development and the Proposed Development funding strategy, including confirmation that Recurrent Energy has access to significant funds to implement the Proposed Development..
REP1-091, REP1-093	Theresa Brewer	Funding for Decommissioning	Comment regarding whether there will be adequate funding available for decommissioning	The Applicant has responded to comments regarding funding during decommissioning in detail within **Table 7-17** (Page 359) of the **Applicant’s Response to Relevant Representations [REP1-047].**
REP1-091	Ruth Abrahams	Applicant Insurance	Clarity required regarding ensuring that adequate liability cover will be in place to cover worst case scenarios	This comment is noted. The Applicant would be required to comply with all relevant legal, regulatory, and industry requirements in relation to insurance and liability. Appropriate liability cover would be maintained in accordance with statutory obligations and standard practice for developments of this nature. Matters relating to detailed insurance arrangements are controlled through existing regulatory and contractual mechanisms and are not material to the determination of the application.
Miscellaneous Comments				
REP1-096, REP1-105, REP1-108 REP1-119, REP1-124, REP1-125,	Michael Campbell, Paul Hathaway, Councillor Marianne Overton, Charles Peter Overton, Susan Mackinson Sanders, Philip John Heard	Oversupply of solar energy and battery projects	Concerns that renewable energy applications submitted and planned for submission are excessive. Comment that the need for solar energy is all but fulfilled and that battery sites are over subscribed according to the “Connection reform results” January 2026 on the Government’s National Energy Operator (NESO) website.	The need case for renewable energy and the Proposed Development is presented in the Statement of Need **[APP-184]**. This demonstrates the urgent need for solar PV generation in the UK and large scale ground mounted solar farms being a key part of this delivery. The Proposed Development has a Gate 2 notification for its solar generation, which means that the National Energy System Operator (NESO) has allocated it as needed to deliver the Clean Power 2035 targets. The Proposed Development is therefore part of NESO’s strategic plans. It is expected that the battery energy storage system will receive a Gate 2 notification at a future allocation round.

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				There is no planning policy requirement at either the national or local level to assess or limit renewable energy development on the basis of a perceived "oversupply" within a particular county or area. The NPSs support the delivery of renewable energy infrastructure to meet national decarbonisation, energy security and climate change targets, which are need-based at a national scale, not constrained by administrative boundaries such as Lincolnshire. Where multiple schemes exist or are proposed, cumulative effects are assessed in accordance with established guidance (e.g. GLVIA3 and Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment), which consider the potential cumulative impacts associated with multiple developments, rather than the concept of 'oversupply'.
REP1-096	Michael Campbell	Oversupply of electricity in Lincolnshire	Lincolnshire is already a net exporter of electricity due to having an oversupply of electricity for local Lincolnshire requirements.	The Proposed Development has been brought forward in accordance with national energy policy, whereby NPS EN-3 recognises solar as a Critical National Priority, and explains that projects such as the Proposed Development and this DCO Application are required to meet the United Kingdom's Net Zero Targets. There is no planning policy requirement at either the national or local level to assess or limit renewable energy development on the basis of a perceived "oversupply" within a particular county or area. The NPSs support the delivery of renewable energy infrastructure to meet national decarbonisation, energy security and climate change targets, which are need-based at a national scale, not constrained by administrative boundaries such as Lincolnshire. Where multiple schemes exist or are proposed, cumulative effects are assessed in accordance with established guidance (e.g. GLVIA3), which consider the potential cumulative impacts associated with multiple developments, rather than the concept of 'oversupply'.
REP1-131, REP1-132	Allyson Julie Sorrell, Martin Robert Sorrell	Ethics and Supply Chain	With panels likely sourced from China or Southeast Asia, there are no assurances that this project is not built upon components linked to forced or slave labour.	The Applicant has responded to comments regarding the manufacture of components and the procurement strategy in detail within **Table 7-18** (Page 375) of the **Applicant's Response to Relevant Representations [REP1-047].**
REP1-128	Malcolm Robert Ramsay	Vulnerability of centralised energy supply	Comment on the likelihood of country-wide blackouts (citing Spain and Portugal in 2025), individual's seeking independence from the National Grid, abuse by government/large corporations.	The comment relates to speculative concerns regarding national power outages, distrust of grid infrastructure, and wider political or societal issues. These matters are not supported by evidence specific to the Proposed Development and do not constitute material planning considerations. The Proposed Development would connect to and operate within the regulated National Grid system and is not expected to increase the risk of electricity supply disruption.
REP1-130	Barry Smith	Cybersecurity	Concern and mounting evidence provided by the UK's Security Services that electronic devices (and their underlying silicon chip architecture) produced by Chinese manufacturers and used in solar generation facilities as well as Battery Energy Storage Systems pose a significant security risk. These risks include the ability for an adversary to trigger a "kill switch" that could take a facility off line or, worst case, cause a battery unit runaway with the subsequent possible fire or explosion. Comment that reliance on a Chinese logistics chain for the implementation of the solar array and battery storage proposed	The Applicant recognises the importance of cybersecurity and system resilience. The Proposed Development would operate within the UK's regulated electricity system and comply with all applicable security, safety, and operational requirements. Matters relating to national security, cybersecurity standards, and supply chain governance are addressed through existing legislative and regulatory mechanisms. Should the Applicant receive consent, it would carry out a comprehensive audit to procure the required components of the Proposed Development. When doing so, the Applicant will treat the need to ensure an ethical supply chain with the utmost importance and is fully committed to the responsible and ethical procurement of all its equipment. The Applicant has proposed an ethical procurement policy within the

Ref. No.	IP Name	Theme	Summary of Members of the Public Written Representations	Applicants Response to Members of the Public Written Representations
			in the Fosse Green development poses a significant cyber security risk to the UK. To mitigate these risks of hostile action by a hostile geopolitical adversary, there is a duty under the Network and Information Systems Regulations (2018) to take appropriate and proportionate technical and organisational measures to manage risks posed to the security of the network and the information systems on which their essential service relies. However, this duty currently only applies to electrical generators with a capacity of more than 2 GW which the Fosse Green Energy (FGE) solar array and battery storage system does not meet. Assertion that responsible developers would, in response to these identified threats, wish to exceed the statutory minimum standards on cybersecurity within the 2018 Regulations.	Framework Employment, Skills and Supply Chain Plan (ESSCP). Under Requirement 19 of Schedule 2 of the Draft DCO, a detailed version of the ESSCP, substantially in accordance with the Framework ESSCP will be submitted to the relevant planning authority for approval. The ESSCP must be implemented as approved.
REP1-110	Katina Johnson	Miscellaneous	The Local Impact Report should clearly and robustly represent the needs, concerns, and views of the local community. It should adopt a firmer and more assertive tone to reflect the strength of local feeling and ensure that community impacts are not understated or diluted. The LIR must act as a strong voice for the community rather than a neutral summary, so that local harm and concern are properly conveyed to the decision-maker. - The needs and views of the local community, and the strength of local concern - The impact on rural character and landscape, including industrialisation of countryside - Effects on wildlife and biodiversity, including habitat loss and disturbance • Impacts on tourism and the local economy, particularly where the area relies on its rural setting - Loss of high-quality agricultural land and implications for food security - Cumulative impacts when considered alongside other nearby developments - Effects on village amenity, including visual impact, noise, and proximity of infrastructure - The importance of less harmful alternatives, such as rooftop and brownfield solar	The Applicant has responded to comments relating to the matters raised in this Written Representation in detail in the following sections of the **Applicant's Response to Relevant Representations [REP1-047]**: • Comments regarding impact on Landscape Character, within **Table 7-4** (Page 260). • Comments regarding Ecology and Nature Conservation, within **Table 7-3** (Page 255). • Comments regarding the loss of agricultural land, within **Table 7-6** (Page 268) • Comments regarding cumulative impact, within **Table 7-10 (**Page 294) • Comments regarding impact on recreation and amenity, within **Table 7.7** (Page 278) • Comments regarding noise impacts, within **Table 7-5** on page • Comments regarding the assessment of alternatives, within **Table 7-12** (Page 320).
REP1-111	Andrew Keeling	National Grid Substation Near Navenby	There is no evidence that National Grid was already considering Navenby as a strategically appropriate location for a new substation on the national electricity network. It is evident that the Navenby substation proposal is being driven by the solar farm projects rather than national or local planning policy priorities.	Section 4.4 of Chapter 4: Alternatives and Design Evolution of the ES **[APP-029]** sets out the methodology adopted for the site selection process. Following a formal application to National Grid for a connection into the 400kV Overhead Line at Whisby, National Grid informed the Applicant that this point of connection was not available and instead the Applicant was offered and subsequently secured a point of connection at the proposed National Grid Substation near Navenby.

Ref. No.	IP Name	Theme	Summary of Members of the Public Written Representations	Applicants Response to Members of the Public Written Representations
REP1-112	Alistair King	Electricity Generation	The applicant states that the project will provide electricity for 110,000 homes. This is misleading. The time profile of energy production by the solar development over a year is almost directly opposite to the energy demand profile for homes over a year. This is true both on a seasonal and day/night basis. The number of homes statement is marketing hype and highly misleading. This metric implicitly assumes: • perfect grid balancing (their own batteries come nowhere close to achieving this). • other sources will fill peak demand and day/night/seasonal deficits. • that peak production can be guaranteed. To counteract these deficiencies there are large additional hidden grid costs not accounted for in the application (but paid for by the consumer/taxpayer)	The reference to the number of homes that could be supplied is a standard, illustrative metric commonly used across the energy sector and in national policy to convey the approximate scale of electricity generation. It is not intended to imply that the Proposed Development would directly supply a fixed number of homes at all times, nor that generation would perfectly align with demand on a day/night or seasonal basis. The Proposed Development would operate as part of the wider National Grid, where balancing of supply and demand is managed at a system level by the network operator using a diverse mix of generation technologies, storage, and demand management measures. The use of a “homes equivalent” figure is not considered misleading and is referenced to illustrate the potential electricity generation of the Proposed Development in a commonly understandable form.
REP1-108	Philip John Heard	Standard of Documentation	Has the Applicant copied large amounts of documents from other solar NSIPs? As an example, could the Applicant please explain the meaning of APP-028 (Chapter 3) Para 3.2.5: “The Draft DCO has been submitted with the DCO to the Secretary of State” Concern that there is a lack of signposting to specific paragraphs or sections of documentation in the DCO Application.	The “Draft DCO” **[REP1-007]** refers to the working version of the specific document (a statutory instrument) that would provide the consent for a Nationally Significant Infrastructure Project (the Proposed Development). The paragraph quoted was to explain that a draft version of the proposed final consent (the Draft DCO) was submitted with the DCO Application. Under the Planning Act 2008, applications are formally submitted to the Secretary of State, albeit by way of the Planning Inspectorate on behalf the Secretary of State. The wording used correctly reflects the legal position on applications under the Planning Act 2008 and copy and pasting of other solar documents has not been undertaken. The comment regarding signposting to specific paragraphs or document sections is acknowledged and signposting to specific sections of documentation has been undertaken as far as possible.
REP1-106	Anne Heard	Community Benefit	The electricity generated by the proposed development will feed into the National Grid and therefore will not benefit the local community. The proposed development is not community-led nor does it benefit the local community	It will not be possible for the Proposed Development to provide electricity directly to local residents or to be used locally because the Applicant is not a licensed electricity supplier. As a holder of an Electricity Generation Licence, the Proposed Development will export power to the National Electricity Transmission System and will sell power into the wholesale UK electricity market. The Applicant recognises the need for local people to benefit from the proposals. This has been thoroughly considered throughout the evolution of the design of the Proposed Development, with input from the local community shaping the final design of the Proposed Development. For example, the proposed permissive path network has evolved following feedback at the statutory consultation stage, as explained in Chapter 4: Alternatives and Design Evolution of the ES **[APP-029]** to maximise community benefits, providing more effective linkages across the site. Based upon the current landscaping designs presented in the Landscape Mitigation Plan, which forms Appendix A of the Framework LEMP **[AS-122]**, once the Proposed Development is operational there will be approximately 9.5 km of new permissive paths created, linking together existing walking routes and creating enhanced connections to surrounding villages, as well as the provision of a 1.8ha new community orchard with open access within the landscaping designs, offering a direct benefit for the local community. The Framework LEMP **[AS-122]**, a detailed version of which is to be developed, substantially in accordance with the framework plan, as secured by Requirement 8 of the Draft DCO **[REP1-007]**, sets out the permissive path network

Ref. No.	IP Name	Theme	Summary of Members of the Public Written Representations	Applicants Response to Members of the Public Written Representations
				will be implemented during operation of the Proposed Development providing routes across the Principal Site and enhancing the recreational value of the Order Limits. It should also be noted that should the Proposed Development be consented, the Applicant will provide a sum of £400 per megawatt capacity per annum during its operational life. Whilst this does not form part of the DCO application and therefore does not comprise a benefit in the context of the planning balance, it does comprise a benefit of the Proposed Development to the wider community.

7. Applicant's Response to Written Representations at Deadline 1 – Persons with an Interest in the Land

7.1 Persons with an Interest in the Land

Table 7-1: Applicant's Response to Persons with an Interest in the Land

Ref. No.	IP Name	Persons with an Interest in the Land Written Submission / Summary of Written Representation	Applicants Response to Persons with an Interest in the Land Written Representation
REP1-101	Luke Daniels	I would like to question the reasoning to why my house which is an historical asset - Grade 2 listed building does not appear on any of the detailed maps? I will be surrounded by BESS which will be 200-300 metres from my property along with 3m high solar panels which will be across the road from my entrance at a distance of less than 20metres away. Both of these will significantly impact my property and well being with a massive drop in value. Along with the amount of noise, disturbance and dust whilst the site is being constructed and beyond. My building is 230 years old and is not built on any foundations, therefore will suffer significantly while construction and traffic takes place. My views will be decimated. I feel that the project is far too close to my property especially considering its historical value. Luke Daniels	The Grade II Listed Property is shown on Figure 7-1: Designated Heritage Assets **[AS-036]**. With regard to impacts to the heritage significance of the Grade II Listed Property, the ES Appendix 7-D: Detailed Heritage Asset Setting Assessment **[APP-127]** provides an appropriate assessment of any harm to the asset from the Proposed Development, including from the location of the centralised BESS. The potential impacts on the Listed Building were discussed with Historic England during an in-person meeting on site on 15 September 2025. In response to Historic England's concerns regarding the proximity of solar PV to the Grade II Listed Property (as well as further heritage assets at Aubourn), amendments have been made to the design of the Proposed Development to remove panels from the field adjacent to the Grade II Listed Property referred to in **[REP1-101]** (referred to in documentation as 'Field 46'). Historic England did not raise any further requirements for any mitigation with regard to the location of the BESS. The outcomes of these consultations are summarised within the SoCG between the Applicant and Historic England (which is currently under preparation and will be submitted at the midpoint of Examination, in line with the Examining Authority's request in its Procedural Decision dated 22 August 2025 **[PD-005]** deadline), and the changes reflected within updated plans as relevant (e.g. the Works Plans **[AS105]**) and updated photomontages **[AS-119]**. As reported in the updated Landscape and Visual Impact Assessment (Chapter 10 of the ES **[AS-117]**), the removal of solar PV in Field 46 adjoining the Grade II Listed Property, and the amendment of proposed landscaping (as set out in the Landscape Mitigation Plan, which forms Appendix A of the Framework LEMP **[AS-122]**) results in the assessment of visual effects at this property reducing from Moderate Adverse (Significant) effects in Years 1 and 15 (Winter) of operation, and Minor Adverse (Not Significant) in Summer Year 15, to Minor Adverse (Not Significant) at Year 1 Winter, and Negligible Adverse at Year 15 Winter and Summer. With regards to battery safety, the centralised BESS is located approximately 300m from residential receptors. A minimum commitment of 200m as set out in the Framework BSMP **[REP1-041]** (ref. paragraph 2.3.5), with the location fixed by the Works Plan **[AS-105]**), has been stated in the Framework Battery Safety Management Plan **[REP1-041]**. as this distance will avoid significant effects on nearby receptors in the unlikely event of a fire. Appendix 14-G: Unplanned Emissions Assessment **[APP-176]** assesses the impact of airborne chemicals and gases produced in the event of a BESS fire and shows that the dilution of gases and the distance from the BESS is sufficient to avoid any exceedances of airborne gas safety levels. There have been very few utility scale BESS fires in the UK to date, all of which were built prior to the current NFCC safety guidance, meaning that the components / setup which caused these fires are no longer permitted for use, and therefore will not be used within the BESS of the Proposed Development. Furthermore, a variety of assessments have been carried out to address potential areas of risk from the BESS as detailed in the Environmental Statement **[APP-025 - APP-179]**, and the

Ref. No.	IP Name	Persons with an Interest in the Land Written Submission / Summary of Written Representation	Applicants Response to Persons with an Interest in the Land Written Representation
			Proposed Development includes embedded design mitigation and protection measures to reduce fire/explosion risk, which are detailed in the Framework BSMP **[REP1-041]**. The BESS is designed so that there is sufficient distance between the cells to mitigate the risk of this spreading (to keep a fire isolated to a single cell (to the extent which it is possible to control this)). This layout has been developed in consultation with the LFRS and has taken account of guidance from the NFCC. the focus of the Framework BSMP is to prevent a fire occurring. The Framework BSMP **[REP1-041]** is to be developed into a detailed BSMP, substantially in accordance with the Framework Plan, secured under Requirement 7 (Battery safety management) of the Draft DCO **[REP1-007]**. It is noted that the LFRS are a named consultee on this Requirement, and as such the LFRS will have the opportunity to review the detailed BSMP prior to any approval. Regarding the comment on noise, disturbance and dust, this has been assessed in Chapter 11 Noise and Vibration **[APP-011]** and Chapter 14 Other Environmental Topics **[APP-039]**. The latter explains that with industry standard mitigation, dust effects are always considered to be not significant when applying the IEMA/ISEP guidelines on dust management in construction. The former demonstrates there will not be significant noise effects during construction, operation, or decommissioning at [redacted], but it does identify potential significant vibration effects associated with piling of the solar PV tables in the field immediately west of the property. This is based on large scale piling equipment rather than the mini-pilers / rammers that are used in solar farm installation and is therefore likely to be an overestimate of the vibration effects; it would also be temporary, for the few days when solar PV is being installed within the nearest 60m of this field. Mitigation measures to control noise, vibration and dust are secured in the Framework CEMP, OEMP, and DEMP **[REP1-031; REP1-033; REP-035]**.