Fosse Green Energy

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EN010154

9.30 Applicant's Response to the Examining Authority's Third Written Questions

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Fosse Green Energy

Development Consent Order 202[ ]

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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's ('the Applicant') response to the Examining Authority's (ExA) Third Written Questions **[PD-021]**, issued on 23 April 2026. This document responds to each of the questions posed to the Applicant, and where the Applicant considered it could provide assistance to the ExA, it has also responded to some questions addressed to other parties.

1.2 Structure of this Document

1.2.1 This report provides a response from the Applicant to the matters raised in the Examining Authority's Third Written Questions **[PD-021]** and is structured as follows:

a. Table 2-1: General and Cross-topic questions: the Applicant's responses to the Examining Authority's General and Cross-topic questions.

b. Table 2-2: Climate Change questions: the Applicant's responses to the Examining Authority's Climate Change questions.

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

Table 1-1: Abbreviations

Abbreviation	Definition
AC	Alternating Current
AIL	Abnormal Indivisible Load
ALC	Agricultural Land Classification
AWS	Anglian Water Services
BESS	Battery Energy Storage System
BMV	Best and Most Versatile Land
BNG	Biodiversity Net Gain
BPA	British Pipeline Agency Limited
BS	British Standard
BSI	British Standards Institution
BSMP	Battery Safety Management Plan
CEMP	Construction Environmental Management Plan
CCGT	Combined Gas Cycle Turbine
CNP	Critical National Priority
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
DEFRA	Department of Environment, Food and Rural Affairs
DEMP	Decommissioning Environmental Management Plan
DMRB	Design Manual for Roads and Bridges
EA	Environment Agency
ECoW	Ecological Clerk of Works
EIA	Environmental Impact Assessment
EPD	Environmental Product Declaration
ERP	Emergency Response Plan
ES	Environmental Statement

Abbreviation	Definition
ESSCP	Employment, Skills and Supply Chain Plan
ExA	Examining Authority
FRA	Flood Risk Assessment
FTE	Full Time Equivalent
GHG	Greenhouse Gas
GPG	Good Practice Guidance
GWh	Gigawatt hours
Ha	Hectares
HDD	Horizontal Directional Drilling
HE	Historic England
HER	Historic Environmental Record
HPA	Health Protection Agency
HV	High Voltage
IEMA	Institute of Environmental Management and Assessment
IP	Interested Party
IRENA	International Renewable Energy Agency
ISEP	Institute of Sustainability and Environmental Professionals
JNCC	Joint Nature Conservation Committee
kV	Kilovolt
LCC	Lincolnshire County Council
LCoW	Landscape Clerk of Works
LEMP	Landscape and Ecological Management Plan
LFRS	Lincolnshire Fire and Rescue Service
LGV	Local Goods Vehicle
LIQ	Land Interest Questionnaire
LIR	Local Impact Report
LNR	Local Nature Reserve
LPA	Local Planning Authority
LSFT	Large Scale Fire Testing
LWS	Local Wildlife Site
LWT	Lincolnshire Wildlife Trust

Abbreviation	Definition
LVIA	Landscape and Visual Impact Assessment
MAFF	Ministry of Agriculture, Food and Fisheries
MSA	Mineral Safeguarding Area
MW	Megawatt
MWh	Megawatt Hours
NCA	National Character Area
NE	Natural England
NERC	Natural Environment and Rural Communities
NESO	National Electricity System Operator
NFCC	National Fire Chiefs Council
NGED	National Grid Energy Distribution
NGET	National Grid Energy Transmission
NH	National Highways
NHLE	National Heritage List for England
NKDC	North Kesteven District Council
NMU	Non-motorised User
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NPS	National Policy Statement
NRMM	Non-Road Mobile Machinery
NSIP	Nationally Significant Infrastructure Project
OEMP	Operational Environmental Management Plan
PEA	Preliminary Ecological Appraisal
PFAS	per-and poly fluoroalkyl substances
PINS	Planning Inspectorate
PRoW	Public Right of Way
PRoWMP	Public Right of Way Management Plan
PV	Photovoltaic
SF_6	Sulfur Hexafluoride
SMP	Soil Management Plan
SoCG	Statement of Common Ground
SoS	Secretary of State
SRN	Strategic Road Network

Abbreviation	Definition
SSEP	Strategic Spatial Energy Plan
SuDS	Sustainable Drainage Systems
SWDS	Surface Water Drainage Strategy
SWMP	Site Waste Management Plan
TA	Transport Assessment
tCO2e	Tonnes CO2 Equivalent
TEC	Transmission Entry Capacity
TPO	Tree Preservation Order
TTM	Temporary Traffic Management
UKHSA	UK Health Security Agency
WCA	Wildlife and Countryside Act
WEEE	Waste Electrical and Electronic Equipment
WSI	Written Scheme of Investigation
WRAP	Waste and Resources Action Programme
WRMP	Water Resources Management Plan
ZoI	Zone of Influence
ZTV	Zone of Theoretical Influence

2. Applicant's Response to the Examining Authority's Third Written Questions

2.1 General and Cross-topic Questions

Table 2-1: Applicant's Response to the Examining Authority's General and Cross-topic Questions

General and Cross-topic questions (GC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
GC.3.01	Applicant NKDC LCC Other Interested parties and other persons	**The Secretary of State's decision with respect to the Springwell Solar Farm** The ExA is aware that the application for the Springwell Solar Farm was determined by the Secretary of State (SoS) on 8 April 2026 and that a Development Consent Order (DCO) has been made for that development. a) **All** - the making of the Springwell Solar Farm DCO may have implications for the cases that have been made by the applicant, NKDC, LCC, other interested parties and other persons up until 8 April 2026. If you consider the making of the Springwell Solar Farm DCO has had any implications for the case you have made about the proposed development prior to that order's making, written submissions should be made explaining how you consider your case has been affected. Following the making of the Springwell Solar Farm DCO, the ExA particularly wishes to be informed about any implications there might be for the consideration of the proposed development with respect to: • defining: the commencement of the proposed development; maintenance; and permitted preliminary works; • the imposition of requirements and the provisions of management plans and any other control documents, including the approach to decommissioning; • the relationship between the Springwell Solar Farm and the proposed Navenby substation; • the fees to be paid to the relevant local planning authority when discharging requirements imposed under the terms of the made DCO; and • any matters that might have been addressed through the applicant and other parties entering into an agreement under section 106 of the Town and Country Planning Act 1990 (a draft copy of which having been appended to NKDC's responses to ExQ2 [REP3-055]). (If any party has included refences to the making of the Springwell Solar Farm DCO in their Deadline 5 submissions then rather than repeating what they may have stated in those submissions in responding to this question you should simply make a cross reference to what you have stated in those Deadline 5 submissions.) b) For **applicant** – it may become necessary for the ExA to refer to either the made Springwell Solar Farm DCO and/or the SoS's decision during the remainder of the examination and/or when reporting to the SoS following the examination's close. Accordingly, the ExA requests that you submit copies of the made Springwell Solar	a. The Applicant considers that the making of the Springwell Solar Farm DCO has the following implications for the Proposed Development DCO: i. In the decision letter, the Secretary of State (SoS) noted that there was an outstanding matter between the Applicant and the local planning authority at the end of the Examination with regard to whether there should be a restriction on the level of replacement of the solar panels in order to restrict the extent of the maintenance which can be undertaken under the Order. The Applicant notes that the SoS was in agreement with the ExA that the wording of Article 5(3) and Schedule 16 of the Springwell Solar Farm Order 2026 would ensure that the carrying out of any works which are likely to give rise to any materially new or materially different effects that have not been assessed in the ES would not be undertaken, and considered that this provides sufficient control. Although the maintenance which the Applicant will be undertaking differs to that proposed for Springwell, the drafting is equivalent to that in Article 5 of the draft DCO **[REP3A-004]** for the Proposed Development. ii. The Examining Authority in relation to the Springwell Solar Farm DCO was satisfied that the applicant met the policy expectations set out in NPS EN-3 in relation to decommissioning, that the funding statement demonstrated that the applicant is able to fund the decommissioning and noted the Secretary of State's decision in relation to the Oaklands Solar Farm, which concluded that there is no policy requirement in NPS EN-3 for a decommissioning fund to be imposed and paragraph 2.10.68 of NPS EN-3 states that solar panels can be decommissioned relatively easily and cheaply. The ExA therefore considered a decommissioning funding bond was not required and the Secretary of State agreed. iii. The Examining Authority in relation to the Springwell Solar Farm DCO recognised the importance of acknowledging that the areas of BMV land occupied by that development, and by extension other solar farm projects in Lincolnshire (including those on or close to the Nottingham border) would only be affected temporarily. The Secretary of State agreed with this assessment. iv. With regards to a separate funding commitment for the local authorities monitoring of BNG delivery, the ExA in relation to Springwell Solar Farm accepted the applicant's position that this was not needed. The applicant had provided a detailed response as to why it did not agree that additional funding was required to enable the local authority to undertake its own specific BNG monitoring over and above what the applicant would undertake. The applicant

General and Cross-topic questions (GC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
		Farm DCO and the SoS's decision letter so that they can be allocated document reference numbers and added to the examination library.	stated that it already had monitoring obligations as set out in its outline LEMP, that it is required to comply with the terms of the approved LEMP under requirement 8 of the DCO, and that failure to do so would constitute a criminal offence. Furthermore, the applicant provided examples of recently made solar DCOs (Heckington Fen, Oaklands, Byers Gill and East Yorkshire) where positive weight was placed on the benefit from the delivery of BNG in the planning balance and monitoring of BNG delivery was to be undertaken by the applicant. Following close of the examination and before the decision, a s106 agreement for funding was entered into by the applicant and the local authorities and therefore the Secretary of State did not go on to consider the ExA's conclusion that the separate funding commitment for the local authorities monitoring of BNG delivery was not required. v. In terms of the relationship between the Springwell Solar Farm and the proposed Navenby Substation, it is noted that the Secretary of State removed the Examining Authority's proposed restriction on the Springwell Solar Farm coming forward until the planning permission has been granted for the proposed Navenby Substation. The Secretary of State did not agree with the Examining Authority on this point given that the Springwell Solar Farm applicant had not identified any issues that would result in refusal of the proposed National Grid substation near Navenby, neither had there been any substantive evidence put forward by the local authorities or Interested Persons ("IPs") that demonstrate that there is an obvious reason as to why planning permission would be refused. This conclusion aligns with that presented in the Applicant's Technical Note for the proposed National Grid substation near Navenby **[REP3-046]**, which sets out in paragraph 4.14 *"on the basis that NGET follow the Horlock Rules by taking a responsible approach to siting, design and mitigation, the Applicant considers there are no obvious reasons that consent for the proposed Navenby substation would be withheld".* The Secretary of State also relied upon the grid connection agreement with NGET and that NGET, as a regulated business, has a legal obligation to meet any requests for power connections. This decision by the Secretary of State is directly comparable to the Proposed Development's relationship with the proposed National Grid substation near Navenby. vi. The s106 agreement securing funding for a skills and education package had not been signed at end of Examination for the Springwell Solar Farm. The Examining Authority concluded that whilst beneficial, this funding would not change the neutral weighting given to population matters. Whilst the Secretary of State could take this into account as the s106 agreement had been signed during the decision making period, he came to the same conclusion as the Examining Authority (meaning this funding commitment was not a determinative factor in the decision making). Other matters:

General and Cross-topic questions (GC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
			i. The layout of Springwell Solar Farm includes some solar panels within Flood Zone 3b; therefore an operational reason was required for the panels to be located herein accordance with NPS EN-1. The Examining Authority recommended to not consent the panels in these areas, however, the Secretary of State did not agree. The Secretary of State's conclusion is based on Annex 3 to the NPPF, the need for the solar panels to be located in proximity to the National Grid connection, and the treatment of solar farms as essential infrastructure from a flood risk vulnerability perspective. The conclusion was also informed by the consideration of alternatives and the objective to maximise renewable energy generation. Furthermore, the Secretary of State noted that LCC (as lead local flood authority) did not object to the presence of panels within Flood Zone 3b in the Statement of Common Ground with the Springwell Solar Farm applicant, and nor did the Environment Agency. The Proposed Development is comparable in that solar PV panels are located within Flood Zone 3a, which has been agreed with LCC (as lead local flood authority) and the Environment Agency. ii. The Springwell Solar Farm decision sets out that the Secretary of State was satisfied that the need case for Springwell Solar Farm is well established and that the Springwell Solar Farm applicant's assessment sufficiently meets the policy requirements across NPS EN-1 and EN-3 in that there will be clear benefits to climate change, the alternatives have been considered appropriately, and the requirements in relation to grid connection had been met. The Applicant considers these matters to be similarly addressed sufficiently throughout this Application's documentation, including the conclusions set out in the Planning Statement **[AS-098]**. b. As requested by the ExA, the Applicant has submitted copies of the made Springwell Solar Farm DCO and the SoS's decision letter to the Examination at Deadline 5A.
GC.3.02	Applicant	**Site selection** Clarify whether: a) the applicant would have identified the site for the proposed development without first being *"…approached by a group of landowners who were willing to provide land north of the A46 at Morton Manor and Housham Grange …"* [paragraph 2.3.1 in Appendix A: Site Selection Report in AS-098]; and b) some or all of the land south of the A46 would have needed to be included in the proposed Order Limits had National Grid Electricity Transmission PLC (NGET) been able to provide a point of connection to the transmission system near Whisby Hall.	a. As set out in the Site Selection Report at Appendix A 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. Whilst the land may not have been identified without initial landowners coming forwards, once it had, the Applicant undertook its own due diligence by conducting a desk top review to consider planning and environmental constraints given land availability is only one of several determining factors in deciding whether to proceed. On completion of the desk top study, the Applicant concluded that the site was viable. Given this approach, the Applicant then sought to verify the location of the Proposed Development by considering whether the site for the Proposed Development is the most suitable taking into account operational requirements, national and local planning policy and environmental constraints. The Site Selection Report at Appendix A of the Planning Statement **[AS-098]** describes the site selection process.

General and Cross-topic questions (GC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
			b. If NGET had been able to provide a point of connection at Whisby Hall, given there is no technical barrier to connecting works either side of the A46, land to the south of the A46 is likely to have been considered as, following the Applicant's due diligence and application to the National Grid, some of the land in the original landholding was further assessed and subsequently discounted on ecology and heritage grounds. Therefore, irrespective of the location of the point of connection further land would still have been required to deliver the Proposed Development in order to maximise the secured grid capacity.
GC.3.03	NGET	**Proposed Navenby substation** a) Clarify whether a planning application for the proposed Navenby substation has been submitted and if a planning application has not been submitted advise on when it is expected such an application will be submitted. b) If by examination Deadline 5A (12 May 2026) a planning application has been submitted to NKDC then copies of: the site location ('red line') plan; a block plan; and elevational drawings for the proposed substation should be submitted to assist other interested parties and the ExA's understanding of the relationship between the proposed substation and the proposed development.	The Applicant understands from discussions with NKDC that, at the point of Deadline 5A, the planning application for the proposed National Grid substation near Navenby has been submitted by NGET but has not yet been validated.
GC.3.04	Applicant NGET	**Implications for the proposed development were the proposed Navenby substation not to be consented and/or constructed** NGET in responding to ExQ1 GC.1.14 has commented "*NGET considers that the deliverability of the proposed solar farm in the event that the proposed Navenby substation did not receive planning permission or was not built is a matter for the Applicant to clarify*" [REP2-051]. The applicant's response to ExQ1 GC.1.14 included in [REP2-029] states *"…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. This connection point would then be pursued by the Applicant subject to a separate consent, as is not uncommon in the offshore wind context* …". The answers to ExQ1 GC.1.14 appear to be inconsistent with one another and the parties should confirm what the situation would be should the proposed Navenby substation not be consented and/or constructed, particularly whether NGET would be bound by the terms of the commercial agreement that the parties have entered into to make an alternative point of connection available to the undertaker for the proposed development.	The Applicant does not consider the responses to ExQ1 GC.1.14 to be inconsistent between the Applicant and NGET – the Applicant understands that NGET's statement, noting that it is "*a matter for the Applicant to clarify*", is simply referring to fact that it is for the Applicant to explain what the implications for the Proposed Development would be should the proposed National Grid substation near Navenby not be consented and/or constructed, given that the focus of this question from the ExA is the "*implication for the Proposed Development*" (as per GC.1.14). The Applicant notes that it has set out its position in GC.1.14 in the Applicant's Response to the Examining Authority's First Written Questions **[REP2-029]**, and maintains this position.

General and Cross-topic questions (GC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
GC.3.05	NKDC	**Proposed battery energy storage systems (BESS) to the south of Hill Rise, west of Coleby and south of Green Man Road, east of Navenby** Provide updates with respect to the determination of the planning applications for: a) the proposed BESS to the south of Hill Rise, west of Coleby (25/0533/FUL), referred to in NatPower's letter of 20 March 2026 [AS-131]; and b) the proposed BESS to the south of Green Man Road, east of Navenby (25/0491/FUL) referred to, in amongst other documents, the first iteration of the applicant's Interrelationships Report [REP4-019]. In providing the update with respect to planning application 25/0491/FULL the council should provide copies of the 'red line' plan, the block plan and any elevations accompanying the submitted application.	N/A
GC.3.06	Applicant NKDC LCC	**Annual maintenance schedules** The Statements of Common Ground (SoCGs) between NKDC and LCC and the applicant (respectively [REP4-013] and [REP4-012]) indicate that the Councils retain concerns about the definition of "maintain" included in Article 2 of the dDCO and the implications this may have for the extent of activities during the operational phase. Comment on whether a requirement for the planned maintenance schedule identified in paragraph 2.3.3 of the Framework Operational Management Plan (FOEMP) [REP3-018] to be approved by the Councils would address those concerns.	The Applicant does not consider it appropriate for NKDC or LCC to have approval roles for the planned maintenance schedules given that the extent of maintenance works required to ensure the continued successful operation of the Proposed Development are a matter for the Operator, and not for the Councils to approve. The Applicant notes that maintenance works are restricted by Article 5 of the Draft DCO **[REP3A-004]**, which states "*This article does not authorise the carrying out of any works which are likely to give rise to any materially new or materially different effects that have not been assessed in the environmental statement*." As such, the Councils are able to consider the extent of activities associated with maintenance works during the operation of the Proposed Development as set out in the ES.

2.2 Climate Change Questions

Table 2-2: Applicant's Response to the Examining Authority's Climate Change Questions

Climate Change (CC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
CC.3.01	Applicant NKDC LCC	**Assessment of greenhouse gas (GHG) emissions offset** With respect to the offset of GHG emissions, the ExA notes the applicant's response to EXQ2 CC.2.03 [REP3-045] on this matter. However, the ExA is not content with the explanation that has been provided. In particular, the statement that "Any anticipated value which assumes that government's capacity ranges are met (noting that the Proposed Development contributes to meeting these ranges) therefore does not constitute a realistic scenario for if the Proposed Development does not go ahead". Given the current policy drivers in place, the ExA considers it highly likely that the UK's electricity grid will become less carbon intensive regardless of whether the proposed development goes ahead. Consequently, the ExA still considers that a scenario for the operation of the UK's grid with no projected decarbonisation is unrealistic. The ExA notes that carbon savings of 225,115tCO2e have been identified as compared with generation in May 2033. The ExA requests that the applicant provides an overall lifetime carbon saving, based on the anticipated carbon intensity for electricity generation in May 2033.	To recap on what was presented in the ES, Chapter 6: Climate Change **[REP3-006]**, shows a net saving of 3,302,906 tCO2e over the lifetime of the Proposed Development, when compared against the current energy mix in 2025 (i.e. at DCO Submission stage). The lifetime carbon savings relative to the anticipated May 2033 energy mix (i.e. inclusive of projected decarbonisation) is 225,115 tCO2e, as noted in the Applicant's response to ExQ2 CC.2.03 **[REP3-045]**. This is approximately 10 times lower than the value stated in the ES. The large reduction in savings is because UK electricity generation in 2033 is forecast to comprise mainly renewable energy and be approaching net zero; therefore, renewables projects after this date will make less difference to the energy mix. The Applicant previously stated in the Applicant's Response to the Examining Authority's Second Written Questions **[REP3-045]** that it considered the current energy mix to be a better comparator than the 2033 energy mix. The reason for this is that the forecast 2033 energy mix relies on the Proposed Development and others like it (or behind it) in the planning system being consented and built. These projects are not guaranteed. The UK has a substantial energy need, as demonstrated by the Statement of Need **[APP-184]** and, should insufficient renewables projects come forward to deliver the UK energy demand, it could in theory lead to other forms of energy generation being proposed to deliver this energy. This might include a series of small gas fired power plants, which do not currently require carbon capture technology (carbon capture readiness only applies to facilities that exceed 5MW). Indeed, at the time the application for the Proposed Development was submitted in July 2025, the equivalent 240MWe gas fired power station (i.e., the same capacity as the Proposed Development) would not have needed to be carbon capture ready and would have therefore resulted in substantial GHG emissions (and a greater GHG saving than the 3,302,906 tCO2e reported in the ES which was based on the 2025 energy mix, a substantial part of which is already renewables). Furthermore, any CCR gas fired power stations will still rely on the actual carbon capture network being built, and may therefore emit substantial GHG emissions for the first years or decades of operation whilst this network is being consented and built. The Applicant therefore considers the 2025 energy mix to be a more reasonable comparator than the 2033 energy mix, given the Proposed Development – and other similar projects in the planning process - form part of this future baseline.
CC.3.02	Applicant	**Sulphur Hexafluoride (SF6)** In responding to ExQ2 CC.2.04 [REP3-045] the applicant states that "*where the use of SF6 is unavoidable due to supply chain availability or technical feasibility – which is likely*	The Proposed Development Parameters have been updated (and submitted to the Examination at Deadline 5A) to note that, should SF6 be required, this would be communicated with the Council.

Climate Change (CC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
		for 33kV infrastructure - this decision would be communicated to the Council in the detailed design as part of Requirement 6 of the dDCO". Comment on whether that commitment should be identified in the Design Approach Document [APP-186] and/or the Proposed Development Parameters [REP1-029] or in some other way to ensure that it would be secured via Requirement 6.	

2.3 Draft Development Consent Order Questions

Table 2-3: Applicant's Response to the Examining Authority's Draft Development Consent Order Questions

Draft Development Consent Order (DCO)			
Question Number	**Question to:**	**Question**	**Applicant Response**
DCO.3.01	Applicant	**Article 2 – interpretation ("maintain") and Article 5 (power to maintain authorised development) and indicative annual maintenance schedules** a) The ExA notes that the indicative annual maintenance schedules Tables C-1 and C-2 in [REP3-045] submitted in response to ExQ2 DCO.2.01 do not appear to identify general maintenance arrangements for the proposed BESS nor design life replacement. Revised versions of Tables C-1 and C-2 should be submitted including the maintenance arrangements for the proposed BESS. b) With respect to the repowering of the proposed solar arrays, clarify for the first row of Table C-2 in [REP3-045] how heavy goods vehicle (HGV) trips per year are being defined, for example does the reference to approximately "… 200 HGV trips per year" mean 100 inbound and 100 outbound (200 two-way trips) or something else?	c. Updated indicative maintenance schedules, including the general maintenance arrangements and design life replacement for the proposed BESS, are provided in Appendix A. d. The *"~200 HGV trips per year"* referenced in the first row (regarding the replacement of PV Modules) of Table C-2 of Appendix C of the Applicant's Response to the Examining Authority's Second Written Questions **[REP3-045]** relates to an estimation of one-way trips, with approximately 200 inbound and 200 outbound HGV movements (i.e. 400 two-way trips total) over the course of a year, between years 29 and 33 of operation of the Proposed Development, anticipated to be required to facilitate repowering. It should be noted that the Environmental Statement (ref. paragraph 3.5.1 of Chapter 3: The Proposed Development of the ES **[REP1-015]** and paragraph 13.7.65 of Chapter 13: Traffic and Transport of the ES **[REP3-010]**) has assessed, as a worst case, that the site-wide equipment replacement activities would generate in the order of 20 HGVs (or 40 two-way HGV movements) per day, representing approximately 40% of the HGV activity generated during the peak construction of the Proposed Development. Furthermore, this level of HGV movement for site-wide replacement activities is also set out in the Framework OEMP **[REP3-018]** (ref. paragraph 2.3.2). The assumption of 400 two-way HGV trips per year within Table C-2 of Appendix C of the Applicant's Response to the Examining Authority's Second Written Questions **[REP3-045]** is therefore much below the assessed level.
DCO.3.02	Applicant NKDC LCC	**Article 2 – interpretation** a) Applicant – Clarify what purpose the definition for "commissioning" would serve, given, unlike "date of final commissioning", it is a term that is not relied upon elsewhere in the dDCO? If it is considered that a definition for commissioning needs to be included in Article 2, should Work Nos 4, 5A, 5B and 6 be added to Work No.1, given those works would need to be fully operational (and thus tested and commissioned) prior to the proposed development being capable of generating and exporting electricity on a commercial basis? b) All – There is a definition for the date of final commissioning and Requirements 5, 9, 13, 17 and 20 include provisions tied to that date. Similarly the proposed protective provisions in favour of Lincolnshire Fire and Rescue (LFR), included in Part 3 of Schedule 14 are tied to the date of final commissioning. An additional paragraph has been added to the Framework Construction Environmental Management Plan (FCEMP) [paragraph 2.2.3 in REP4-008] stating that the applicant will inform LCC of the date of final commissioning once it has occurred. However, the relevant planning authority for Requirements 5, 9, 13 and 20 is NKDC	a. The definition of "commissioning" is used in the definition of "date of final commissioning" and is therefore necessary for inclusion within Article 2. In accordance with the ExA's comments, the Applicant has amended the definition of "commissioning" in Article 2 to include reference to Work No.s 4, 5A, 5B and 6. b. The Framework CEMP has been updated at paragraph 2.2.3, to be submitted to the Examination at Deadline 5A, to note that the Applicant will inform both LCC and NKDC of the date of final commissioning once it has occurred.

Draft Development Consent Order (DCO)			
Question Number	**Question to:**	**Question**	**Applicant Response**
		and there is no provision within any of the requirements included in Schedule 2 for date of final commissioning to be notified to NKDC. To allow for the effective monitoring and/or enforcement of Requirements 5, 9, 13, 17 and 20, a notification mechanism (either as a standalone requirement or an amendment to an existing requirement(s)) must be added to Schedule 2. Submit wording for the required notification mechanism. Note for the applicant and other all parties With respect to the scope/definition for "permitted preliminary works" included in Article 2, the ExA notes the applicant's intention to submit a "Permitted Preliminary Works Environment Management Plan" (PPWEMP) no later than Deadline 5 [response to ExQ2 DCO.2.08 and DCO.2.09 in REP3-045]. Following the PPWEMP's submission it may be necessary for the ExA to seek further information relating to that plan's contents and/or the definition for permitted preliminary works included in Article 2 from the applicant and/or other interested parties.	
DCO.3.03	Applicant	**Requirement 8 (Landscape and ecological management plan)** The applicant's response to ExQ2 DCO.2.13 [REP3-045] identifies that it is agreeable to including National Highways as a consultee on Requirement 8 with the caveat that consultation would be limited to mitigation works within 15 metres of the A46. The dDCO was amended at Deadline 3A to reflect that [REP3A-004]. Explain why the consultation with National Highways should be restricted to mitigation works within 15 metres of the A46 and the reasons for not including National Highways as a consultee on the same basis as the other bodies referred in Requirement 8.	As set out in the Applicant's Response to Deadline 4 Submissions **[REP5-025]** (ref. p44), a distance of 15m from the edge of the A46 carriageway was initially proposed in order to cover the area of the existing hedgerow which adjoins the A46, therefore meaning that National Highways would be a consultee regarding any LEMP mitigation/management works concerning these hedgerows. The Applicant considers this to be the only LEMP-related works which could have the potential to affect National Highways interests (i.e. the A46 Strategic Road Network) and therefore considered this an appropriate 'consultation zone' for LEMP works within which National Highways would be consulted. However, in preparing the figure requested by National Highways illustrating this (ref. **[REP4-025]**), and further interrogating the proposed 15m consultation zone, the Applicant identified a number of pinch points due to the alignment of the A46 highway edge where some existing hedgerow extends beyond the 15m buffer zone. As such, an alternative approach has been proposed, whereby a plan has been prepared (which forms Appendix B, Figure 7.15-2: National Highways Consultation Zone of the Framework LEMP **[REP5-017]** which defines a specific consultation zone as opposed to committing to a set 15m distance. This revised consultation zone encompasses all the front and rear (with appropriate offsets) of the hedgerows adjoining the A46, and as such ensures that National Highways would be consulted on the relevant LEMP mitigation/management works which have the potential to affect NH interests. The wording of Requirement 8 of Schedule 2 to the Draft DCO, submitted at Deadline 5A, has been updated accordingly. It should be noted that the Applicant has shared the proposed consultation zone with National Highways, and National Highways have confirmed that they will respond at Deadline 5A.
DCO.3.04	Applicant LCC	**Requirement 17 (Permissive paths)** The ExA notes the applicant's concern about ensuring that the permissive paths do not become treated as public rights of way at the end of the operational lifetime of the	As set out in the Applicant's Response to Deadline 4 Submissions **[REP5-025]** (ref. p19), it should be noted that this wording within the Framework LEMP **[REP5-017]** is such that the Applicant 'may' close the permissive paths for up to seven days in any

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		proposed development. However, it is unclear why the exclusion of "up to seven days" as set out in paragraph 6.1.2 of the Framework Landscape and Ecological Management Plan (FLEMP) [REP3-028] has now been included. In responding to ExQ1 [REP2-043], LCC advised "*provided that there is sufficient signage to show that use of the route is by permission, there is no need to restrict access for a day. The efficacy and legal impact of a one day closure is not likely to have any impact on a user based claim, unless there is sufficient other actions taken by the landowner to disabuse the public of the notion that they are exercising a public right*." a) Applicant: Explain why up to seven days in any calendar year has been identified as an exclusion for public use of the permissive paths. b) LCC: Explain whether appropriate signage to show that use of the permissive paths is by permission would be sufficient to protect against possible claims for public rights in the future, or what other mechanisms would be required.	calendar year. The Applicant is not stating that these closures will be implemented, but rather that it has the right to implement such closures. The wording 'up to seven days' further demonstrates that the Applicant does not necessarily intend to close the permissive paths for this period but is retaining the flexibility to do so. This strikes a balance between allowing flexibility for closures, whilst ensuring that public access is largely uninterrupted. During a typical year without repowering the permissive paths are not expected to require closures for maintenance. Advance notice will be given to NKDC (as per the commitment in Section 6 of the Framework LEMP **[REP5-017]**) so that notification of closures can be published on the Stepping Out Walks website, where these routes are affected. Whilst the closure period of up to seven days would be separate from any closures for maintenance activities, the Applicant would seek to minimise the total number of closures in any one year. Maintenance activities that may require the closure of a permissive path may include activities such as emergency works (e.g. following a storm event), fence repairs, plant and vehicle movements facilitating activities such as deliveries of replacement equipment or panel cleaning, vegetation management, etc.
DCO.3.05	Applicant	**Requirement 20 and funding for decommissioning** The ExA notes the applicant's response to ExQ2 DCO.2.28 [REP3-045] and the comments made during the course of Issue Specific Hearing 4 [REP3-043] concerning the arrangements for the decommissioning of the proposed development at the end of its operational life that any undertaker would be bound by under the provisions of Requirement 20. In relation to the response to ExQ2 DCO.2.28 the ExA, amongst other things, is mindful of: • the written answer provided on the government's behalf by Lord Wildson of Sedgefield on 16 June 2025 to the question tabled by Lord Kirkhope of Harrogate on 2 June 2025 • the applicant's comments relating to project viability • the observations made about the asset value of the proposed development's components, albeit it would seem likely that the value of components would have depreciated after their installation, with any such depreciation becoming more marked towards the end of a replacement cycle If the provisions of Requirement 20 were to be breached an offence would be committed and that could result in a prosecution being brought, pursuant to section 161(1) of PA2008. A person convicted of breaching or failing to comply with an order granting development consent would be liable to a fine under section 161(4) of PA2008. Under section 161(3) a defence to a prosecution is that "(a) the breach or failure to comply occurred only because of an error or omission in the order". Were there to be a breach of Requirement 20, irrespective of whether a successful prosecution was brought and the guilty person or persons was/were fined, that would not as a matter of course guarantee the decommissioning and restoration of the land affected by the	The Applicant maintains its that it is not necessary to provide any form of financial security for the decommissioning of the Proposed Development as set out in various documents including the Applicant's Response to Written Representations **[REP2-030]**, the Applicant's Response to Local Impact Reports **[REP2-031]**, the Applicant's Response to the Examining Authority's Second Written Questions **[REP3-045]**, the Applicant's Response to Deadline 2 Submissions **[REP3A-025]**, the Applicant's Response to Deadline 3 and 3A Submissions **[REP4-018]**, and the Applicant's Response to Deadline 4 Submissions **[REP5-025]**. In addition to the extensive reasoning set out by the Applicant in the aforementioned submissions, the Applicant notes the position taken by the Secretary of State in paragraph 4.12 of the Springwell Solar Farm decision letter (Planning Inspectorate Reference: EN010149) that the imposition of a requirement for a decommissioning bond is not necessary or appropriate. Whilst the Applicant maintains its position the Examining Authority's request is noted. The Applicant provides the following wording **on a without prejudice basis;** *No later than 15 years from the date of final commissioning the undertaker must notify the relevant planning authority of the mechanism for accruing a reinstatement fund sufficient for the undertaker to undertake decommissioning works in accordance with the decommissioning environmental management plan.*

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		proposed development. In the event of injunctive relief being sought and an injunction being issued, any subsequent contempt of court resulting in a prison sentence would also not necessarily result in the site's decommissioning. The ExA remains concerned that neither Requirement 20 nor the dDCO in general would adequately provide for the decommissioning of the land affected by the proposed development. Accordingly, the applicant, on a without prejudice basis, should provide wording for inclusion within Requirement 20 establishing a mechanism for funding the decommissioning of the proposed development once it ceased to be operational.	
DCO.3.06	Applicant	**Schedule 3 (Legislation to be disapplied)** The applicant in [REP3A-001] has advised that it expects that it will have completed its review of the legislation sought for disapplication by Deadline 6 (2 June 2026). The ExA considers that review ought to be completed not later than Deadline 5A so that there will be sufficient time remaining within the examination for the ExA to seek any further information relating to this matter if required	The Applicant has reviewed the legislation sought for disapplication. The draft DCO has been amended (submitted to the Examination at Deadline 5A) to reflect the removal of legislation which the Applicant is no longer seeking to disapply, and the Explanatory Memorandum to the DCO has been updated to provide justification for the legislation retained in Schedule 3.
DCO.3.07	Applicant	**Schedule 6 (Streets and public rights of way)** Explain whether there is a difference between a "temporary partial closure" and "temporary single lane closure" in part 1 of Schedule 6. If not, should the terminology be the same and the dDCO amended accordingly?	As set out in the Applicant's Response to Deadline 4 Submissions **[REP5-025]** (ref. p58), where the word 'partial' is used this relates to sections where the carriageway is less defined and the works are likely to be slightly more limited; for example, a partial closure of a lane to allow vegetation trimming or access tie in works. This differentiation provides flexibility for the Contractor to manage these works in a safe manner working in conjunction with the Local Highways Authority and as such, it is not considered necessary to amend the Draft DCO.
DCO.3.08	Network Rail Prax Downstream UK Limited (in liquidation) Prax Lindsey Oil Refinery Limited (in liquidation)	**Schedule 14 (Protective provisions)** In the event that bespoke protective provisions in your favour have not been agreed with the applicant in advance of examination Deadline 5 (28 April 2026), then you MUST at Deadline 5 submit sets of your preferred protective provisions in portable document format (PDF) and in clean editable (Microsoft Word) forms. The Microsoft Word version must be compatible for use with the Statutory Instrument template so that if the ExA considers it necessary your preferred protective provisions can be incorporated by the ExA into its recommended version of the dDCO that will accompany its recommendation report for the SoS's consideration irrespective of whether the ExA recommends that a DCO should or should not be made.	N/A
DCO.3.09	Applicant and other interested parties for which protective provisions are proposed	**Schedule 14 (Protective Provisions) minor drafting amendments** With respect to minor drafting amendments to the proposed protective provisions included in Schedule 14, the parties should refer to the ExA's schedule of proposed changes to the dDCO [PD-022]. The applicant and other interested parties should identify any typographic and/or formatting errors that require correction within the dDCO not included in the ExA's schedule of proposed changes to the dDCO.	The Applicant has reviewed Schedule 14 and rectified the typographical and formatting errors. The updated Draft DCO will be submitted to the Examination at Deadline 5A.

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DCO.3.10	Applicant National Highways	**Part 5 of Schedule 14 (Protective provisions in favour of National Highways)** With respect to: a) Paragraph 37(1) (Interpretation), is there a need to: I. include the abbreviations "AMOR" and "NOMS" because they are not repeated within any other paragraph in Part 5? II. include a definition for "road space" within paragraph 37 in the interests of precision, given a definition for "road space booking" has been included and that term has been used on multiple occasions within Part 5 whilst the extent for the affected road space has not been defined? b) Paragraph 42(f) (Prior approvals and security) "CV" needs to be defined or replaced with its long form if only used once within Part 5. c) Paragraph 46 (Opening) in Part 5 of Schedule 14, clarify the purpose of this paragraph, given that while the proposed development might cause some interference with the operation of the existing strategic road network, it would not involve the opening of new sections of the strategic road network. If it is considered that paragraph 46 would be necessary, a clearer explanation of what is meant by the opening of the strategic road network should be provided within paragraphs 37 or 47. d) Paragraph 50(b) (Security), clarify whether meeting obligations to make payments should be "… under paragraph 41 …" or under a different paragraph within Part 5 because paragraph 41 (Works outside the Order limits) does not appear to relate to meeting payment obligations. e) Paragraph 51(1) (Commuted sums) "FS" needs to be defined or replaced with its long form if only used once within Part 5. f) Paragraph 55(1), (2) and (4) (Land), would there be any land within the extent of the strategic road network boundary affected by the proposed development that is currently not owned by National Highways that would be capable of being transferred to National Highways from the undertaker under the provisions of paragraph 55? If not then paragraphs 55(1), 55(2) and 55(4) should be deleted.	As these protective provisions are in an agreed form between the Applicant and National Highways (NH), the Applicant has sought clarification from NH with regard to the below points. a. (i) The Applicant understands from NH that these abbreviations are widely recognised industry terms used to refer to relevant documents and systems. However, NH has indicated that it does not object to their deletion, and as such, the Applicant has deleted these abbreviations from the draft DCO. (ii) NH has provided wording for the definition of "road space" and the Applicant has updated the draft DCO accordingly. b. The Applicant has amended paragraph 42(f) to include the long form of "CV". c. The Applicant has sought clarification from NH and notes that NH considers that this provision will be relevant where the strategic road network is closed to traffic to facilitate works associated with the Proposed Development. Following such a closure, NH requires 56 days' notice before the strategic road network is re-opened to traffic. NH has indicated that, whilst it is not considered necessary, additional wording could be added to paragraph 46 to provide clarity, d. The Applicant has amended paragraph 50(b) to refer to paragraph 44. e. The Applicant has amended paragraph 51(1) to include the long form of "FS". f. The Applicant and NH have agreed that, since detailed design is yet to be undertaken, it is not clear whether there will be a need for NH to rely on these provisions to secure any required transfer of freehold land. The parties have accordingly agreed to retain these provisions.
DCO.3.11	Applicant Anglian Water Services	**Part 6 of Schedule 14 (Protective provisions in favour of Anglian Water Services Limited)** Explain what the practicable application of paragraph 69 (Miscellaneous) would be, citing any examples to assist explaining the need for the inclusion of this paragraph in any made DCO for the proposed development.	This provision provides clarity regarding any separate agreements that might be made. The Applicant understands that Anglian Water will be providing the ExA with precedents to exemplify the inclusion of such provision in other DCOs.
DCO.3.12	Applicant and National Grid Electricity Distribution	**Part 7 of Schedule 14 (Protection of National Grid Electricity Distribution (East Midlands) PLC)** a) Paragraph 77(6) (Removal of apparatus) states *"…Should such an alternative engineering solution not be practicable and deliverable in a reasonable timescale and at a reasonable cost (which shall be determined by the undertaker*	a. As these protective provisions are in an agreed form between the Applicant and NGED, the Applicant has sought clarification from NGED, and it is not considered that an amendment is required. NGED has stated that the drafting is intended to provide for the, albeit unlikely, scenario in which NGED's apparatus (currently located within the Order Limits) must be diverted outside of the Order Limits as a result of the Proposed Development. Although this is not intended, in

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	(East Midlands) PLC) (NGED)	*acting reasonably), NGED may but shall not be compelled to use the powers of compulsory acquisition set out in this Order or the Electricity Act 1989(a) to obtain the necessary facilities and rights in the land outside the Order limits …*" Review and amend the drafting as necessary. The ExA considers the drafting of paragraph 77(6) is likely to need amendment because it appears the scenario envisaged within paragraph 77(6) would concern: 1) land outside the proposed Order Limits; and 2) in any event it would be the undertaker, rather than NGED, that would be authorised to exercise the powers of compulsory acquisition included in Part 5 (Powers of Acquisition) of any made DCO for the proposed development. b) Paragraph 78(2) (Facilities and rights of alternative apparatus) appears to presume as a default no amicable agreement would be achieved under paragraph 78(1) and determination by an expert, to be appointed pursuant to the provisions of paragraph 82 (Expert determination), would automatically be required. The ExA considers that paragraph 78 needs to be amended to address circumstances whereby agreement might be reached between the undertaker and NGED under paragraph 78(1) without recourse to determination by an expert. Accordingly, appropriate wording should be incorporated into paragraph 78(2) as an intervening step before there being any recourse to an expert determination. c) In paragraph 79(8) (Retained apparatus) it is stated that "…Nothing in this sub-paragraph prevents NGED from exercising its rights under sub-paragraph (7)". Is the cross reference to sub-paragraph (7) correct, given sub-paragraph (7) does not refer to rights exercisable by NGED?	the unlikely event that this is required prior to construction, the drafting provides for the parties to firstly seek rights to secure NGED's apparatus in an alternative location and, failing that, notes that NGED (as a statutory undertaker) has the ability to seek compulsory purchase powers under the Electricity Act 1989. Any use of compulsory purchase powers outside of the Order Limits by NGED would, of course, be a last resort and subject to a separate appraisal as to the needs case and public interest tests at the time. For this reason, as well as the technical design and engagement undertaken between the Applicant and NGED to date, NGED does not envisage such route to be necessary. However, the Applicant understands this is standard drafting in protective provisions for the benefit of NGED and is intended to help/facilitate the implementation of the Order in the event of any unforeseen technical issues associated with keeping the assets in situ. b. The Applicant and NGED do not consider that an amendment is required. Paragraph 78(2) does not have the default of expert determination; the wording requires that the parties first intend to agree ('may be agreed between the parties'). In other words, the first step is consensual agreement and then, failing this, the parties can fall back on expert determination. c. The Applicant confirms that this is a typographical error and the reference should refer to paragraph 78. The draft DCO has been updated accordingly.
DCO.3.13	Applicant NGET	**Part 8 of Schedule 14 (Protection of National Grid Electricity Transmission Plc as electricity undertaker)** a) Both - in paragraph 85(3) (Application) what does the reference to "… (but without prejudice to 11(3)(b))" mean? b) Both - in paragraph 86 (Interpretation) what does the abbreviation "NGESO" stand for? Although the abbreviation is used on several occasion it has not been stated in long form in paragraph 86. Why is it necessary to make any reference to NGESO, given the only reference to it is within paragraph 86? c) Applicant - Paragraph 90(2) states "Regardless of any provision in this Order or anything shown on the land plans, the undertaker mu[s]t not unless otherwise agreed in writing acquire any land forming part of the Navenby Site". Given the wording of paragraph 90(2) and the expectation that works relating to the construction of the proposed Navenby substation by NGET would precede the construction of the proposed development, explain why it would be necessary for the undertaker to be granted powers of compulsory acquisition relating to the site for the proposed Navenby substation because such powers	a. This is a cross-referencing error. The reference should be to "sub-paragraph 95(4)(b)" which excludes the undertaker's liability for works authorised under the NGET protective provisions that are carried out by NGET. Once such works become "new apparatus", however, any authorised works not falling with this sub-section will be subject to the full terms of NGET's protective provisions. As to the meaning of "without prejudice to 95(4)(b)" in sub-paragraph 85(3): this provision disapplies the requirements of sub-paragraph 85(2) where the benefit of the Order is transferred or granted to NGET (as is the case under sub-paragraph 94(4)(b)). The "without prejudice" wording makes it clear that sub-paragraph 95(4)(b) is not subject to the requirements of 85(2). It should be noted that a further amendment is needed to sub-paragraph 95(4)(b) to replace the cross reference to "sub-section 3(b)" with "sub-section 4(b)". There is no sub-section 3(b). The Applicant has updated the draft DCO accordingly. b. This abbreviation should be "NESO". The Applicant has confirmed with NGET that wording can be added to clarify that this stands for "National Energy System Operator". The draft DCO has been updated accordingly.

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		could not be used in connection with the implementation of the proposed development without the use of that land being agreed with NGET, in effect negating any benefit of the acquisition powers sought? It appears that a commercial agreement entered into by NGET and the undertaker pursuant to the provisions of paragraph 90 could obviate the need for the compulsory acquisition of land forming part of the site for the proposed Navenby substation. d) Both - Within paragraph 95(4)(b) (Indemnity) a cross reference is made to Article 35 (Consent to transfer the benefit of the Order). However, under Article 34 (Benefit of the Order) in respect of proposed Work No. 5B (high voltage connection works for the proposed Navenby substation) NGET is intended to be a beneficiary of any made DCO for the proposed development. Is there a need to amend paragraph 95(4)(b) so that either Article 34 is referred to rather than Article 35 or both Articles 34 and 35 are cited?	c. This wording was included in error. It has been deleted from the draft DCO submitted at Deadline 5A. It is not agreed by the Applicant. Discussions with NGET are ongoing. The Applicant requires powers of compulsory acquisition of new rights over the relevant land to enable it to secure all required interests in land for the following reasons: i. The Applicant needs statutory authority to carry out its works, which then need to be supported by the ability to secure (by compulsion if necessary) the required powers to construct operate, maintain and access its scheme. ii. Whilst the Applicant will work together with NGET the programme, for constructing NGET's scheme is not known. It may be necessary for the Applicant to secure rights over land and carry out its works before NGET mobilises its scheme (or has secured any interest in the relevant land). This may even be necessary to meet NGET's own construction programme requirements. The Applicant must retain its ability to take the rights it requires, given the current uncertainty as to when NGET will mobilise, what rights in land NGET hold at the relevant time and what NGET will require the Applicant to have constructed to meet the parties' relevant connection timetables. iii. At this time it is not clear what restrictions could be imposed by landowners on NGET when NGET negotiates or otherwise secures the powers and interests in land it requires for the Navenby Scheme. Given that uncertainty, the Applicant requires powers of compulsory acquisition in case NGET is blocked from providing the required rights to the Applicant to progress the Applicant's scheme. iv. The proposed new rights are unlikely to be incompatible with NGET's proposed new rights over the relevant land and so are unlikely to impact on NGET's interests in the relevant land. v. Therefore, compulsory acquisition powers should be retained over the relevant plots. This remains the case even if the ExA re-inserts Paragraph 90(2) when making a recommendation to the Secretary of State, as the compelling need for powers to secure new rights over parties interested in the land, other than NGET, will remain. d. The Applicant has amended sub-paragraph 95(4)(b) to refer to Article 34 (Benefit of the Order), since Article 34 is stated to be subject to Article 35.
DCO.3.14	Applicant NKDC LCC	**Schedule 15 (Procedure for the discharge of requirements)** a) All - with respect to paragraph 5 (Fees) should the discharge fees quoted in the made DCO for the Springwell Solar be used in paragraph 5(2)? If so, is a further adjustment required to take account of the annual indexation increase for planning application fees introduced by The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023, given an annual indexation increase recently took effect on 1 April 2026?	a. As stated in the Applicant's Response to Deadline 4 Submissions **[REP5-025]**, the fee structure in paragraph 5(2) has been revised in line with the increases which took effect on 1 April 2026. These revisions are reflected in the draft DCO submitted at this deadline. b. The Applicant has previously set out its position with regards to indexation in the Applicant's Response to Deadline 3 and 3A Submissions **[REP4-018]**. The Applicant maintains its position but notes the Examining Authority's request. The following wording is therefore provided **on a without prejudice basis**.

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		b) Applicant – with respect to the fees to be paid for discharging requirements, the ExA notes your response to ExQ2 DCO.2.31 [REP3-045], in which you have expressed the view that the fees cited in paragraph 5 of Schedule 15 should not be increased annually in line with the consumer price index because*:* *"…the Proposed Development must be commenced within five years from the date that the Order comes into force. The majority of the Requirements set out in Schedule 2 will be discharged prior to or during the construction period, which is anticipated to take place between 2031 and 2033. The only Requirement which will be discharged at a later date is Requirement 20 which provides for approval of the Decommissioning Environmental Management Plan. Further, the fees due will not be affected by inflation in the same way in which, for example, costs of construction would be. …".* However, within the five year commencement period (Requirement 2) there could still be an appreciable inflationary effect with resourcing implications for the planning authorities, as has been recognised within the fee regulations applying to applications submitted under the provisions of the Town and Country Planning Act 1990 (as amended). Accordingly, the ExA considers wording for an indexing mechanism should be submitted, on a without prejudice basis, for consideration by the ExA.	Schedule 15 (Procedure for discharge of requirements), paragraph 1 (Interpretation) - insert the following definitions: "Index" means the Consumer Price Index published by the Office for National Statistics or any official publication substituted for it or any replacement or modification of such index in force from time to time "Index Linked" means increased or decreased in accordance with the following formula: amount payable = the fee specified in paragraph 5(2) multiplied by (A/B) where: A = the figure for the Index that applied when it was last published prior to the date the payment is due; and B = the figure for the Index that applied when it was last published prior to the date of this Order coming into force. Schedule 15 (Procedure for discharge of requirements), paragraph 5 (Fees) - insert a new sub-paragraph (4): The fees payable under sub-paragraph (2) are to be Index Linked.

2.4 Ecology and Nature Conservation Questions

Table 2-4: Applicant's Response to the Examining Authority's Ecology and Nature Conservation Questions

Ecology and Nature Conservation (ENC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
ENC.3.01	Applicant Forestry Commission	**Ancient and Veteran Trees** Paragraph 5.4.53 of National Policy Statement (NPS) EN-1 (2023) states that the SoS should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists. Direct and indirect impacts on ancient woodland is identified as a matter under discussion in the SoCG between the applicant and the Forestry Commission [REP3A-010]. Comment on whether the proposed development would result in the loss or deterioration of ancient woodland or ancient or veteran trees. If so, comment on whether the various management plans would provide a suitable compensation strategy.	It should be noted that the Framework LEMP **[REP5-017]** (ref. paragraph 5.2.6) and Framework CEMP **[REP5-011]** (ref. ARB-C1) set out that no veteran or ancient trees or ancient woodland are to be removed and further provide mitigation/management measures (as discussed below) to mitigate potential deterioration of habitats. With these controls in place, as secured through Requirements of the Draft DCO **[REP3A-004]**, the Proposed Development will not result in the loss or deterioration of ancient woodland or ancient or veteran trees. The Framework CEMP **[REP5-011]** (ref. ARB-C1, p90) sets out that a total of five Root Protection Area (RPA) incursions will be required for veteran trees (trees T708, T709, T1004, T1120 and T572 – see Appendix 10-H: Arboricultural Impact Assessment of the ES **[APP-155]**) to facilitate the use of existing access roads for construction traffic. Existing access roads vary in condition from formal road surfaces to gravel tracks and are predominantly used for agricultural purposes. Where existing access roads are to be utilised for the Proposed Development but no change from the existing use is required (e.g. no change in width, height or ground loading from vehicle use) these situations are not considered to require any mitigation measures. This is likely to apply to trees T708, T709, T1004 and T1120 – see Appendix 10-H: Arboricultural Impact Assessment of the ES **[APP-155]**. As set out in the Applicant's Response to the Examining Authority's First Written Questions **[REP2-029]** (ref. ENC.1.17), the track next to T572 is labelled as Moreton Lane on county series mapping (1888) which indicates its long-standing use. It is likely formed of hard standing compacted material which has been partially overgrown. As this access route is already effectively surfaced this is not considered to be new surfacing but rather re-surfacing or reinforcement, however it is less formally surfaced than the other existing access routes adjacent to T708, T709, T1004 and T1120 and is therefore considered separately. This access route provides access to a number of agricultural fields and is used by agricultural machinery and is therefore considered to be heavily compacted. Due to this current use, the ground conditions within the RPA of this tree may worsen due to the use of agricultural machinery in all weather conditions including when the ground is wet (and more liable to compaction) which is likely to cause further soil compaction and the formation of ruts which are already present on site. Therefore, in its current state the soil conditions within the RPA of this tree may worsen and this could negatively impact the physiological condition of the tree. For the purposes of the Proposed Development, it is intended that this access route is utilised for emergency access only (and the existing agricultural use would cease) which would reduce the frequency of traffic from its current use. However, to avoid causing further damage to the structure of the soil within the RPA, mitigation measures include the use of a three-dimensional cellular confinement system that would be specified to the highest anticipated load and would add reinforcement to the existing ground cover. This surface is considered to form a type of ground protection that will

Ecology and Nature Conservation (ENC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
			maintain existing soil structure and prevent any further compaction of the soil within the RPA. It also allows for the permeation of water and gas exchange between the soil and atmosphere. Therefore, the Proposed Development is considered to provide an opportunity to prevent any further damage to the soil conditions within the RPA of this tree. The Arboricultural Method Statement (secured by the Framework CEMP, and to be produced as part of the detailed CEMP) will set out any requirements with regards to the protection and monitoring of T572 as relevant. Where existing access roads are utilised or where appropriate mitigation measures are utilised soil structure will be maintained, resulting in no likely adverse impact on the physiological or structural condition of the trees. The final specification for mitigation measures will be detailed in the Arboricultural Method Statement. The Framework CEMP **[REP5-011]** (ref. ECO-C1) also sets out mitigation measures to avoid potential direct and indirect impacts to Ancient Woodland, such as the implementation of undeveloped buffers of at least 15m from the boundary of woodlands in accordance with Standing Advice from Natural England and Forestry Commission (2022). This buffer is also secured by Design Commitment EC3 within the Design Approach Document **[APP-186]** and the Framework LEMP **[REP5-017]** (ref. paragraph 4.1.14). It should be noted that, in light of the implementation of this mitigation secured by the Framework CEMP, Design Commitments and the Framework LEMP, Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]** (ref. Table 8-15) establishes that there will be no potential impact pathway upon Ancient Woodland (which falls within the 'Habitat – broadleaved woodland' and 'Woodland and forest – other woodland, mixed' Important Ecological Feature (IEF) category of assessment). As explained in the Applicant's Response to Deadline 2 Submissions **[REP3A-025]** (ref. p7-9), in response to comments from the Forestry Commission **[REP2-050]** and Lincolnshire Wildlife Trust **[REP2-055]**, and from subsequent email correspondence from Natural England supporting this point, the Framework LEMP was updated at Deadline 3 to include a new sub-section titled '*Natural Regeneration Buffer to Woodland'* at paragraphs 5.3.13 – 5.3.16 setting out the function, implementation and long-term management of this habitat type. The Landscape Mitigation Plan (Figure 7.15-1 of Appendix A of the Framework LEMP **[REP5-017]**) was also updated accordingly at this stage to include this natural regeneration woodland buffer of up to 30m wide to the west, south and east of the Ancient Woodland which adjoins the DCO Site (i.e., Tunman Wood and Housham Wood). This area will be encouraged to naturally regenerate from grassland and former cropland to allow native trees to recolonise areas naturally, offering superior biodiversity, lower costs, and better climate resilience compared to active tree planting. It is noted that the Statement of Common Ground with the Forestry Commission **[REP3A-010]** (ref. 4.1.1) shows an agreement between the Applicant and the Forestry Commission regarding the Ancient Woodland Buffer Zones, noting that the natural regeneration buffer secured by the Framework LEMP (as described above) provides a buffer in excess of 30m for the majority of the perimeter of Tunman/Housham Woods Ancient Woodland, in line with the Forestry Commission's request.

Ecology and Nature Conservation (ENC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
			It is also noted that the Statement of Common Ground with the Forestry Commission **[REP3A-010]** (ref. 4.1.4) shows an agreement between the Applicant and the Forestry Commission regarding the risk and management of potential impacts to veteran trees (as described above). Item 4.1.5 of the Statement of Common Ground with the Forestry Commission **[REP3A-010]** is still noted as 'Under Discussion' in relation to direct and indirect impacts on Ancient Woodland. The Forestry Commission has requested amendments to the Proposed Development design (i.e. reducing the area of PV panels or increasing the offset on one side of the woodland) and the introduction of edge habitats (e.g. scrub) along the perimeter of Tunman/Housham Woods to increase connectivity and reduce the level of enclosure of Tunman/Housham Woods Ancient Woodland (notwithstanding the addition of a 30m natural regeneration buffer to be implemented, as described above). The Forestry Commission further note that the "*30m regenerative buffer will provide some habitat benefit for the ancient woodland in time*", however note "*There will still be a need for consideration of pollution control methods e.g. dust and light pollution during construction. If the area fails to regenerate, traditional planting methods should be used*". As set out in the Applicant's position in the Statement of Common Ground with the Forestry Commission **[REP3A-010]** (ref. 4.1.5), the Applicant is not proposing to reduce the area of solar PV panels around Tunman/Housham Woods as this would not optimise the use of the grid connection and the Proposed Development's contribution to support the delivery of the UK's legally binding emissions reduction targets. In the event the Proposed Development footprint is smaller than the maximum parameters for which consent is being sought – for example if the pitch is less than allowed or panels have a greater rated output per m^2 than has been modelled – the Applicant will consider at the detailed design stage whether it can increase the offset for solar PV from Tunman/Housham Wood or avoid solar PV on one side of this Ancient Woodland (this is noted in paragraph 7.1.10 of the Framework LEMP **[REP5-017]**). Regarding the Forestry Commission's comments in relation to pollution control methods and management if the natural regeneration zone fails to regenerate, the Applicant considers that the Framework CEMP **[REP5-011]** includes sufficient mitigation and management measures in relation to dust and lighting (e.g. see AQ-C1, Section 2.5 and ECO-C1) and the Framework LEMP **[REP5-017]** (ref. paragraph 5.3.16 and 7.1.9) includes appropriate long-term management, such as annual inspection and survey during establishment, of this habitat to appropriately manage its regeneration. It is further noted that paragraph 7.1.10 of the Framework LEMP **[REP5-017]** commits to the Ecological Advisory Group (or similar) sharing the detailed design layout and fencing arrangement with the Forestry Commission, providing the Forestry Commission with an opportunity to comment.
ENC.3.02	Applicant NKDC LCC	**Ecological Advisory Group** The changes made to the FLEMP [REP3-028] and the applicant's response to Deadline 3 and Deadline 3A submissions (page 11 in [REP4-018]) indicate that the councils would not have a role on the ecological advisory group (or similar). The FLEMP	a. Regarding the rationale for not including representatives from NKDC and LCC on the Ecological Advisory Group (EAG) (or similar), given that the defined purpose of the EAG (as per paragraph 7.1.9 of the Framework LEMP **[REP5-017]**) is to oversee the post-construction ecological monitoring works, with the key function of the EAG comprising review of monitoring data on habitats and species to inform

Ecology and Nature Conservation (ENC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
		(paragraph 7.1.9) describes the key function of the group as reviewing monitoring data on habitats and species to inform future management plans. Monitoring reports would be sent to the councils and the Lincolnshire Wildlife Trust for information. In responding to ExQ2 ENC.2.09 in [REP3-055], NKDC has referred to the approaches taken for the Springwell and Beacon Fen schemes. NKDC's submission includes an extract from the draft Outline LEMP for Springwell which identifies that a representative from NKDC and LCC would be on the ecological steering group. NKDC's submission also includes the dDCO for Beacon Fen (submitted at Deadline 8) and Requirement 7 of that dDCO requires that the ecological steering group would include representatives from each of the relevant planning authorities. a) Applicant - Explain the rationale for excluding representatives from NKDC and LCC on the ecological advisory group and what role is envisaged for the councils in terms of monitoring and advising on any corrective action required to ensure that the mitigation and enhancement measures secured through the LEMP would be achieved. b) Applicant - Paragraph 7.1.9 of the FLEMP sets out that the terms of reference for the ecological advisory group (or similar) would be agreed as part of the agenda for the first group meeting. Based on the current drafting of the FLEMP, the councils would not be members of the group and so would have no input into the group's terms of reference. The ExA is of the view that at least draft terms of reference for the ecological advisory group (or similar) should be included in the FLEMP. This should include confirmation of when it would be established and how long it would be in place. c) NKDC and LCC - comment on the applicant's approach to the ecological advisory group.	future management plans (as necessary), the Applicant does not consider that participation in the EAG by NKDC/LCC representatives is required to fulfil this purpose and function. The host councils will be the recipient of the outcomes from the EAG, which will include the ecological and BNG monitoring reports for information, plus the LEMP (where relevant, as set out in paragraph 7.1.12 of the Framework LEMP **[REP5-017]** and below). The Councils have the responsibility to review and approve the LEMP under Requirement 8 of the Draft DCO **[REP3A-004]**, including any material changes proposed to the approved detailed LEMP management proposals, in response to the findings of post-construction monitoring. Similarly, ecological monitoring reports required as part of Requirement 12, 13 and 14 (CEMP, OEMP, and DEMP) will be shared with the host Councils as part of the Applicant's duties under the DCO. It is therefore not considered necessary for the Councils to be part of the EAG in order to input to the earlier stage of the preparation of these documents. Regarding the role envisaged for the Councils in terms of monitoring and advising on any corrective action required to ensure that the mitigation and enhancement measures secured through the LEMP would be achieved, as set out at paragraph 7.1.11 of the Framework LEMP **[REP5-017]** and above, results from the post-construction monitoring will feed into the detailed management plan and, if required, management proposals will be amended accordingly based on the results of this monitoring (for example, replacement planting and/or changes to planting species where planting has failed to establish). As noted in paragraph 7.1.9 of the Framework LEMP **[REP5-017]**, the monitoring reports for surveys will be sent to the Councils and the Lincolnshire Wildlife Trust for their information, along with a summary of any proposed changes to the management plans. Any proposed material changes to the approved detailed LEMP management proposals, in response to the findings of post-construction monitoring, will be sent to the host authorities for their review and approval prior to their implementation. As set out in the Applicant's Response to Deadline 4 Submissions **[REP5-025]** (ref. p8), as the approving body for the detailed LEMP, NKDC will receive the LEMP following incorporation of comments from the Ecological Advisory Group (or similar) members, for its review and subsequent approval following consultation with LCC, Natural England, the Environment Agency and, in respect of landscaping and ecological mitigation within the 'National Highways Consultation Zone' defined by Figure 7.15-2 of the Framework LEMP **[REP5-017]**, with National Highways. b. Regarding the inclusion of draft Terms of Reference within the Framework LEMP, the Applicant maintains that it is considered appropriate for the Terms of Reference for the EAG be drafted post-consent and agreed as part of the agenda for the first EAG meeting given that the Framework LEMP **[REP5-017]** (ref. paragraph 7.1.9) already sets out information akin to a draft Terms of Reference (for example regarding the purpose and proposed membership of the EAG), and as such considers that the inclusion of draft Terms would not offer substantial value at this stage. At the first EAG meeting, the measures set out and secured in

Ecology and Nature Conservation (ENC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
			the Framework LEMP **[REP5-017]** regarding the EAG (e.g. within paragraph 7.1.9) will be reviewed by the EAG in informing the Terms of Reference.
ENC.3.03	Applicant NKDC LCC	**Biodiversity Net Gain (BNG)** Paragraph 2.6.2 of the FLEMP [REP3-028] states that 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 (Version 1.0.4). That is consistent with statements in paragraph 1.4.6 of the BNG Report [REP3-024]. Requirement 8 of the dDCO [REP3A-004] requires the BNG percentages to be based on the metric used to calculate those percentages specified in the BNG Report. Paragraph 2.9.2 of the BNG Report states that the calculation will be updated as part of the detailed design stage for the proposed development. Comment on whether there is a need to add wording to the FLEMP, the BNG Report and/or Requirement 8 to establish that the achievement of the BNG percentages specified in Requirement 8 would be based on the metric extant at the time the LEMP would be submitted for approval. If so, provide suggested wording.	The Applicant does not consider it appropriate for the future BNG calculations to be based on a revised Metric in the future, and as such has sought to align the BNG commitments with the Metric utilised at the point of DCO Submission (i.e. DEFRA's Statutory Biodiversity Metric (Version 1.0.4)). Given that future iterations of the Metric and their implications to the way BNG may be calculated is unknown at this stage, and given that the breach of any commitments under a DCO amounts to a criminal offence whereby the provisions and Requirements of a DCO are enforceable by the Local Planning Authority, the Applicant considers that the approach taken is proportionate, appropriate and robust, securing a significant level of net gain for the Proposed Development.
ENC.3.04	Applicant	**BNG – strategic significance** LCC in its relevant representation [RR-157] considered that as NKDC has identified criteria (Central Lincolnshire Biodiversity Opportunity Mapping) for assessing strategic significance and that the metric should be updated to reflect that. In responding to the revised BNG Report, LCC states that the Medium strategic significance category should no longer be used because NKDC has identified the Lincolnshire Biodiversity Opportunity Mapping as a suitable document [REP4-020]. NKDC expressed a similar view in its response to the revised BNG Report [REP4-021]. a) Given the councils' comments about the identification of a 'suitable document', explain why the Medium strategic significance category has been used in the BNG Report within the context of the advice on strategic significance included in DEFRA's Statutory biodiversity metric: user guide. b) Quantify how applying the approach described by the councils would affect the BNG calculations that have been undertaken.	a. As set out in the Applicant's Response to Deadline 4 Submissions **[REP5-025]** (ref. p7 and p17), the Applicant has updated the BNG Report **[REP5-015]** (submitted to the Examination at Deadline 5) to correspond with the method requested by LCC and NKDC, removing the Medium strategic significance category and reassigning as either Low or High strategic significance. b. As demonstrated in the updated BNG Report **[REP5-015]**, and set out in the Applicant's Response to Deadline 4 Submissions **[REP5-025]** (ref. p7) the conclusions of the previous BNG assessment remain valid in light of the updates made to the BNG Report, whereby the commitments made by the Applicant (as secured by Requirement 8(2) of Schedule 2 to the Draft DCO **[REP3A-004]**) remain. The key change presented in the updated BNG Report **[REP5-015]**, is that the Trading Rules are now satisfied.
ENC.3.05	Applicant NKDC LCC	**NPS EN-1 and the approach to BNG** NKDC and LCC consider that if the full benefit of the BNG claimed is to be given weight/positive weight, the methodology and guidance for calculating BNG should be followed [REP4-021] and [REP4-020]. As highlighted by the councils, the BNG Report [REP3-024] does not currently meet the Statutory Biodiversity Metric trading rules because of the loss of a plastic-lined agricultural reservoir classified as "Lake – Reservoir" habitat.	As set out in the Applicant's Response to Deadline 4 Submissions **[REP5-025]** (ref. p7 and p17), the Applicant has amended the design, re-routing the proposed access track which previously passed through the "Lake – Reservoir" habitat. Given the avoidance of this habitat, the updated the BNG Report **[REP5-015]** (submitted to the Examination at Deadline 5) now meets the Statutory Biodiversity Metric Trading Rules.

Ecology and Nature Conservation (ENC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
		Comment on whether the applicant's approach to assessing BNG conflicts with the requirements of NPS EN1 such as those set out in paragraphs 4.6.2, 4.6.6, 4.6.7, and 5.4.19.	
ENC.3.06	Applicant	**Embedded avoidance and mitigation measures - fish** Table 8-13 in Environmental Statement (ES) Chapter 8 (Ecology and Nature Conservation) [page 124 in REP1-019] states that "*construction will be undertaken during daylight hours to avoid the need for artificial light*". However, item ECO-C4 in the FCEMP [REP4-008], which addresses impacts for fish, identifies that "*where practicable, construction will be undertaken during daylight hours to avoid the need for artificial light*". (ExA emphasis) Should "*where practicable*" be removed from ECO-C4 in the FCEMP to provide certainty that the conclusion of the effects for fish in Table 8-15 [REP1-019] can be relied on. If not, why? In responding to this question, a review should be undertaken to determine whether there are other similar references in the various management plans that may introduce doubt about the deliverability of mitigation measures identified in Chapter 8 of the ES, with any necessary amendments being made.	The Applicant acknowledges that Table 8-13 of Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]** (ref. p8-124) notes that construction will be undertaken during daylight hours to avoid the need for artificial light as a best practice method during activities where there are direct impacts to watercourses or waterbodies, whereas the Framework CEMP **[REP5-011]** (ref. ECO-C4) notes this as "where practicable". The Applicant confirms that, given the other controls secured by the Framework CEMP in relation to lighting, the potential impacts to fish are adequately mitigated, whereby the assessment is not reliant upon no artificial light to reach the conclusion of no likely significant effects to fish – for example ECO-C1 of the Framework CEMP **[REP5-011]** states: *"Any lighting used during construction, particularly in winter months when daylight hours are shorter, has the potential to spill into adjacent habitats (including LWS) and watercourses. Artificial lighting of these habitats may impact habitats and disrupt species' movements. Therefore, any lighting that is required for the construction of the Proposed Development will have a power output of 8kVA and will be directed away from existing retained and sensitive habitats to minimise light disturbance. Any requirements for task-specific lighting during construction will be designed to be downward directional and will only be used for the duration of the task. All temporary lighting will need to satisfy health and safety requirements, as well as minimising potential effects on the surrounding areas by minimising sky glow, glare, and light spillage."* As stated in paragraph 2.5.1 of the Framework CEMP **[REP5-011]**, as far as practicable, construction works will be limited to daylight hours, with focussed task specific lighting provided where this is not practicable, such as where specific works (e.g. HDD) have commenced and require completion before the end of the day. The use of lighting is only likely to be required in such instances in the winter months, which will also avoid key spawning and migratory windows for the priority fish species identified in the baseline assessment presented in Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]**. Therefore, it is not considered necessary to remove "where practicable" from the Framework CEMP **[REP5-011]**, whereby the conclusion of the effects for fish in Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]** remains valid.
ENC.3.07	Applicant	**Significance of effects – fish** Table 8-15 in Chapter 8 of the ES [page 144 in REP1-019] presents the determination of potential impacts and effects on important ecological features. That assessment considers whether there would be a potential impact pathway and identifies if there would be the potential for an effect to occur. The ecological features where a potential for an effect to occur was identified have been taken forward for further assessment in	The Applicant notes that this is not clearly stated, however can confirm that fish were considered (alongside aquatic macrophytes and macroinvertebrates) under consideration of the potential impact pathways upon Important Ecological Features (IEFs) associated with the *'Temporary loss of and fragmentation of Main Rivers (including Ditches) within the DCO Site'*; i.e. item (c) within the list at paragraph 8.12.4, which is assessed at paragraph 8.12.13 of Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]**. It should be noted that the mitigation measures

Ecology and Nature Conservation (ENC)			
Question Number	**Question to:**	**Question**	**Applicant Response**
		section 8-12 of Chapter 8 of the ES other than aquatic macrophytes and macroinvertebrates and fish [respectively pages 155 and 157 in REP1-019]. Aquatic macrophytes and macroinvertebrates are referenced under main rivers in section 8-12, however fish are not. Comment on whether fish should be subject to further assessment in line with the approach described in paragraphs 8.12.2 and 8.12.3 Chapter 8 of the ES.	secured by the Framework CEMP **[REP5-011]** (e.g. ECO-C4) will ensure that the Proposed Development will not result in likely significant effects upon fish species, whereby (as concluded in paragraph 8.2.13 of Chapter 8: Ecology and Nature Conservation of the ES **[REP1-019]**) the impact to fish during construction would be a temporary minor adverse effect that is not significant.

2.5 Farming and Soils Questions

Table 2-5: Applicant's Response to the Examining Authority's Farming and Soils Questions

Farming and Soils (FS)			
Question Number	**Question to:**	**Question**	**Applicant Response**
FS.3.01	Applicant NKDC LCC Natural England	**Framework Soil Management Plan – operation and decommissioning** In [REP3A-037] reference is made to the Framework Soil Management Plan (FSMP) [REP4-010] not addressing the proposed development's operational and decommissioning phases. In response, the applicant in [REP4-018] states that "post construction", as covered in section 6 of the FSMP, is the operational phase and that the FDEMP is intended to capture all mitigation measures for the decommissioning phase, including those in relation to soils, with mitigation related to soils during decommissioning presented in Table 7 of the FDEMP [REP3-020]. However, section 6 of the FSMP appears to be focussed on describing the use of soils and does not address, for example, soil protection measures during maintenance or replacement activities. Table 7 of the FDEMP identifies the mitigation/enhancement measure as being the SMP. Comment on whether the FSMP should provide a more explicit framework for the management measures that would be adopted to manage the soil resource during the proposed development's operation and decommissioning and if so, what should be included, for example measures to deal with soil compaction in areas under the proposed solar stations and the BESS.	The Applicant Acknowledges that Section 6 of the Framework SMP **[REP4-010]** does not refer to maintenance activities or repowering. The previous response from the Applicant should have referred to both Section 5, which reflects soil management during all phases of the Proposed Development, and to Section 6 which addresses allocation of soil on site. General operational activities would be routine, infrequent works that are not expected to lead to soil compaction or require additional mitigation. Repowering works have the potential to be more substantial and akin to those during the construction phase, with more heavy construction equipment moving around the site. Again, the decommissioning phase would be similar to construction, albeit on a slightly smaller level of intensity. Section 5 of the Framework SMP states that the measures apply to all phases of the Proposed Development, however for clarification, the title of this section has been amended to reflect that it applies to all phases, with the updated Framework SMP submitted into the Examination at Deadline 5A. The Applicant will review the responses from NKDC, LCC and Natural England in due course and decide whether any further changes to the Framework SMP are required.
FS.3.02	Applicant	**Framework Soil Management Plan – soil stockpiling** Paragraph 5.7.1 in the FSMP [REP4-010] identifies a generally acceptable height of 2 to 4 metres for soil stockpiles and that wet soils must be stockpiled to a minimum height due to risk of compaction. Clarify what is meant by "*a minimum height*" for wet soils.	Reference to 'minimum' heights of stockpiles has been included in error. This paragraph is intended to explain the reasoning for the previous sentence, and as such should have said 'maximum'. The reference to a minimum height has been deleted (which reference to a 'maximum' remaining) from the updated Framework SMP, submitted to the Examination at Deadline 5A.
FS.3.03	Applicant NKDC LCC Natural England	**Framework Soil Management Plan** Given the importance of the SMP for avoiding soil deterioration, comment on whether there are other matters which should be included in the FSMP [REP4-010] to provide a clear framework for inclusion within a detailed SMP.	The Applicant has based the Framework SMP on good industry working practices, its experience on other projects, and the Framework SMPs accompanying several made DCOs for solar NSIPs, and therefore considers its content to be appropriate. The Applicant will review the responses from NKDC, LCC and Natural England in due course and decide whether any further changes to the Framework SMP are required.

2.6 Historic Environment Questions

Table 2-6: Applicant's Response to the Examining Authority's Historic Environment Questions

Historic Environment (HE)			
Question Number	**Question to:**	**Question**	**Applicant Response**
HE.3.01	Applicant Historic England	**SoCG – archaeology** In the SoCG between the applicant and Historic England submitted [REP3A-011] some matters are identified as being under discussion: • 4.1.3 - acceptability of the Methodology for Appendix 7-G: Detailed Gradiometer Survey Report • 4.1.4 - acceptability of the Methodology for Appendix 7-H: Written Scheme of Investigation for an Archaeological Evaluation • 4.1.11 - acceptability of mitigation measures in relation to buried archaeology proposed during operation and contained within Management Plans In the applicant's Deadline 3A submissions' covering letter [REP3A-001] it is stated that the applicant, LCC and Historic England "*are in agreement that the Framework Written Scheme of Investigation, together with the subsequent work and activities secured under Requirement 11 of Schedule 2 to the draft Development Consent Order [REP2-005], can adequately manage the risk of discovering as yet unknown buried remains, with a suite of mitigation options available to avoid or adequately minimise adverse effects during construction, operation (including maintenance) and decommissioning of the Proposed Development.*" Confirm whether that means that the three areas identified as being under discussion in the SoCG [REP3A-011] are now agreed. If not, explain what further assessment would be required to address any remaining areas of disagreement and identify the timescale for completing any such assessment.	In email correspondence received by the Applicant on 24 April 2026, Historic England confirmed: "*We are* content *with the iterative approach set out in the Framework Archaeological WSI and the reporting of investigations undertaken thus far (as set out in the updated documentation submitted up to deadline 3a). There is a remaining need for a mechanism to secure the effective integration of the soils management plan and the ecological management plan with the archaeological approach set out in the framework WSI and avoid conflict between competing considerations. Works subject to these three considerations need to be coordinated via the CEMP as design develops through the post DCO period into construction, operation and decommissioning including any works associated with reinstatement to previous land uses*". These updates will be captured in the Statement of Commonality which is being submitted into Examination at Deadline 7.
HE.3.02	Applicant LCC	**SoCG – archaeology** In the applicant's Deadline 3A submissions' covering letter [REP3A-001] it is stated that the applicant, LCC and Historic England "*are in agreement that the Framework Written Scheme of Investigation, together with the subsequent work and activities secured under Requirement 11 of Schedule 2 to the draft Development Consent Order [REP2-005], can adequately manage the risk of discovering as yet unknown buried remains, with a suite of mitigation options available to avoid or adequately minimise adverse effects during construction, operation (including maintenance) and decommissioning of the Proposed Development*." However, in commenting on Deadline 3 and 3A documentation, LCC states that it is currently reviewing the latest version of the Framework Written Scheme of Investigation and will respond in detail at Deadline 5 [REP4-020]. Provide an update on the matters identified as "*under discussion*" in the SoCG [REP4-012], including whether they have been resolved, will likely be resolved before the close of examination (this should include an explanation of what further work	The Applicant considers that the Framework Written Scheme of Investigation (WSI), together with the provisions of Requirement 11 of Schedule 2 to the draft DCO **[REP3A-004]**, addresses the concerns. Further comments provided on the Framework WSI by LCC at Deadline 5 confirm general agreement with the content or timing).

Historic Environment (HE)			
Question Number	**Question to:**	**Question**	**Applicant Response**
		would be required from the applicant including likely timescales for completion if relevant), or if they are matters which cannot be agreed.	
HE.3.03	Applicant LCC	**SoCG – built heritage assets** The SoCG between the applicant and LCC [REP4-012] indicates that LCC maintains that for a limited number of designated heritage assets, the ES *"… may understate the effect of the development on their significance through changes to their setting …"*. Heritage assets specifically identified by LCC are: • Hall Close, Scheduled Ancient Monument (SAM) • Morton Manor, listed building • Morton Grange, listed building In responding to the applicant's Heritage Technical Note, LCC states that the heritage assets where it has remaining concerns are reflected in the locations identified 'above' to assist the ExA when undertaking its further Unaccompanied Site Inspection (USI) [REP4-020]. LCC identified locations for the USI in [REP3-049]. In addition to the locations listed above, [REP3-049] also included Corner Farmhouse. **a) LCC:** Confirm whether the remaining concerns about built heritage assets relate to Hall Close SAM and Morton Manor, Morton Grange and Corner Farmhouse listed buildings. **b) Both:** This matter is identified as "*under discussion*" in the SoCG [4.4B.6 in REP4-012]. Provide an update on this matter including whether it has been resolved, is likely to be resolved before the close of examination (this should include an explanation of what further work would be required from the applicant including likely timescales for completion if relevant), or if it is a matter which cannot be agreed.	Following a review of the concerns raised by LCC with regard to the matter '*under discussion'*, the Applicant considers that the assessment within Appendix 7-D Detailed Heritage Asset Setting Assessment of the ES **[APP-127]** accurately considers the significance, setting and the likely effects of the Proposed Development upon those designated heritage assets. This matter is therefore not currently agreed, and is likely to remain as such.
HE.3.04	Applicant NKDC	**SoCG – built heritage assets** The SoCG between the applicant and NKDC [REP4-013] indicates that NKDC maintains its view that the applicant's assessment underestimates the effects on the following listed buildings: Morton Manor; Morton Grange; River Farmhouse; and Grange Cottage. NKDC considers that those assets should be the subject of further analysis in order to inform a bespoke mitigation strategy. As set out in the SoCG, the applicant considers that the assessments undertaken are appropriate. This matter is identified as "*under discussion*" in the SoCG (item 4.6B.3). Provide an update on this matter including identifying whether it has been resolved, is likely to be resolved before the close of examination (this should include an explanation of what further work would be required from the applicant including likely timescales for completion if relevant), or if this is a matter which cannot be agreed.	Following a review of the concerns raised by NKDC with regards to these heritage assets, the Applicant maintains the position that a sufficiently extensive and detailed settings assessment of the assets has been carried out, with a mitigation strategy incorporated into the design of the Proposed Development, and no additional assessment is required. This matter is therefore not currently agreed, and is likely to remain as such.
HE.3.05	NKDC	**Built heritage assets**	N/A

Historic Environment (HE)			
Question Number	**Question to:**	**Question**	**Applicant Response**
		The purpose of the applicant's Heritage Technical Note [REP3A-026] is identified as responding to matters raised in the Local Impact Reports [REP1-053 and REP1-056] relating to the study area used and a group value assessment for farmsteads. In the context of the Heritage Technical Note's purpose and the assessments included in Chapter 7 of the ES (Cultural Heritage) [APP-032] and Appendix 7-D (Detailed Heritage Asset Setting Assessment) [APP-127], clarify what is meant by the statement made in [REP4-022] that "*Despite requests that these get treated separately from the farmsteads study, Morton Manor, Morton Grange and River Farmhouse have only been considered in the farmsteads study as part of a group value exercise … .*"	

2.7 Land rights (Compulsory Acquisition and Temporary Possession) Questions

Table 2-7: Applicant's Response to the Examining Authority's Land rights (Compulsory Acquisition and Temporary Possession) Questions

Land Rights (Compulsory Acquisition (CA) and Temporary Possession (TP) (LR)			
Question Number	**Question to:**	**Question**	**Applicant Response**
LR.3.01	Network Rail	**Land plots for which Network Rail has an interest** The ExA notes: the response provided by Network Rail to ExQ2 DCO.2.29 in [REP3-066]; Network Rail's relevant representation [RR-205]; and the contents of the signed SoCG between Network Rail and the applicant [REP3A-018] which refer to Network Rail possessing rights in respect of Land Plots 13/3 and 13/6 as shown on the Land Plans [AS-104]. The ExA further notes that the Book of Reference [REP4-004] records that for Land Plots 13/3 and 13/6 there are Category 1 owners and/or occupiers. a) With respect to Land Plots 13/3 and13/6, which appear to relate to a stretch of overgrown disused railway track in a cutting, identify what accommodation rights owed to unknown third party beneficiaries would be affected by the proposed development and explain how *"…any extinguishment, interference and/or suspension of these rights could negative[ly] impact Network Rail's ability to comply with such obligations to maintain the accommodation works*" and *"… may interfere with the safe and efficient operation of the Railway and could cause a serious detriment to the carrying on of Network Rail's statutory undertaking*." as referred to in [RR-205]. b) Explain how the conveyance of Land Plots 13/3 and 13/6 in 1977 to the extant Category 1 owners and/or occupiers might be prejudiced by the implementation of the proposed development and why the inclusion of protective provisions in favour of Network Rail in any made DCO for the proposed development would more appropriately protect Network Rail's interests as an alternative to any rights that could be exercised by the Category 1 owners and/or occupiers for Plots 13/3 and 13/6? c) With respect to the response to ExQ2 DCO.2.29 included in [REP3-066] explain what is meant by "*Given that the scheme is located within a railway corridor comprising operational railway and Network Rail land, Network Rail's standard form Protective Provisions must be included in the Order to ensure Network Rail's assets are properly protected during the construction and operation of the project as the Scheme …",* given that none of the land within the proposed Order Limits, as shown on the Land Plan [AS-104], appears to be within a railway corridor comprising operational railway land.	N/A
LR.3.02	Applicant Navenby Energy Limited	**Proposed BESS to the south of Hill Rise, west of Coleby** **a) Applicant** - Comment on the contention made by Navenby Energy Limited in [REP3-070], as promoters of the proposed BESS to the west of Coleby and subject to the undetermined planning application 25/0533/FUL, that the proposed development *"… creates a significant and unresolved land-use conflict*". In responding to this	The Applicant has provided a response to the contention made by Navenby Energy Limited in **[REP5-028]**. Appendix 1 to this submission details a technical solution which would allow the Proposed Development and the proposed BESS project to co-exist within the Order Limits of the Proposed Development. The Applicant prepared an indicative plan to demonstrate the technical solution which would allow this co-existence. This was submitted as Appendix 2 to **[REP5-028]**.

Land Rights (Compulsory Acquisition (CA) and Temporary Possession (TP) (LR)			
Question Number	**Question to:**	**Question**	**Applicant Response**
		question identify what design measures could be utilised to enable the proposed BESS and the proposed development to operationally coexist. **b) Navenby Energy Limited –** i. The applicant has summarised the details for this proposed BESS in section 2.2 of its Interrelationships Report [REP4-019]. In that summary the applicant has questioned where the intended point of connection to the transmission system would be for the proposed BESS. Clarify where the intended point of connection for the proposed BESS would be**.** ii. Explain precisely why *"…the easternmost field cannot accommodate a cable easement for the technical and operational reasons set out above*" [foot of page 3 in REP3-070].	

2.8 Landscape and Visual Questions

Table 2-8: Applicant's Response to the Examining Authority's Landscape and Visual Questions

Landscape and Visual (LV)			
Question Number	**Question to:**	**Question**	**Applicant Response**
LV.3.01	Applicant	**Visual assessment** Part of the Bassingham and villages circular Stepping Out walk is along Clay Lane. Table 55 in Appendix 10-F (Visual Assessment) [page 171 in AS-120] relates to users of Clay Lane and Bassingham Road. The assessment presented in Table 55 finds that there would be adverse visual effects of moderate significance during construction and up to at least year 1 of operation, decreasing to minor adverse from year 15 of operation and during decommissioning, with the assessment stating that views would be "experienced at speed and short lived". NKDC in its written representation [page 26 in REP1-057] observes that the assessment relates to the effects for motorists and suggests it places too low a value on the existing views for walkers, who will spend longer traversing this area and taking in the landscape. This point does not appear to have been addressed in the applicant's response to written representations [REP2-030] or the LIR [REP2-031] when responding to the Stepping Out network matters. Comment on the Council's point that too low a value has been placed on views for walker in this location and any implications for the assessment.	When reaching overall judgements on sensitivity of visual receptors, GLVIA3 states at paragraph 6.31 that separate judgements on value and susceptibility should first be assessed. The Applicant acknowledges that NKDC disagrees with the medium level of susceptibility that the Applicant has attributed to users of Stepping Out walks, and that NKDC would judge them to have a high level of susceptibility when applying the Applicant's LVIA methodology **[APP-149]**. The Applicant has set out its justification for different levels of susceptibility of recreational users of public rights of way, within the Applicant's Response to the Examining Authority's Second Written Questions **[REP3-045]**. In summary, within the Applicant's LVIA methodology **[APP-149]**, the Applicant distinguishes between users of public rights of way where their interest is likely to be focussed on the landscape, and users of public rights of way where appreciation of the view is unlikely to be the primary interest. The Applicant acknowledges that the landscape views are relevant to the experience of users of Stepping Out Walks but considers views to not be the specific reason for people choosing to use these routes. With regard to the judgements on value attached to views, this is influenced by the quality or distinctiveness of the different elements, or lack thereof, within views. This is not, however, influenced by the length of time spent experiencing the views and so would be attributed the same value regardless of the activity being undertaken by those experiencing the views. When assessing the value attached to views of users of Clay Lane, the Applicant considered the presence of moderate quality elements, specifically the local road surrounded by arable fields and groups of vegetation, to warrant a medium value. The Applicant's professional judgement is therefore that a medium susceptibility, medium value and medium sensitivity is appropriate for both motorists and users of the Stepping Out Walk along Clay Lane.
LV.3.02	NKDC	**Relationship between the proposed development, the Lincoln and Witham Landscape Recovery Project (LWLRP) and Witham Valley Country Park (WVCP)** The council in its post Issue Specific Hearing 3 note providing background information about the LWLRP has advised of an intention to submit: a plan ("mapping") superimposing the proposed Order Limits and the boundary for the WVCP onto a plan showing the extent of the area covered by the LWLRP; and further timescale information relating to the LWLRP [paragraphs 3 and 12 in REP3A-030]. The submission of that information would assist the ExA's understanding of the interrelationships between the proposed development, the LWLRP and the WVCP. Accordingly, the ExA requests that the additional information referred to in [REP3A-030] is submitted as soon as possible.	N/A

2.9 Population Effects Questions

Table 2-9: Applicant's Response to the Examining Authority's Population Effects Questions

Population Effects (PE)			
Question Number	**Question to:**	**Question**	**Applicant Response**
PE.3.01	NKDC	**Hours of construction** During Issue Specific Hearing 3, the applicant stated that no noisy works would be undertaken in the final hour of the day (18:00 – 19:00) (page 26 of [REP3-042]). In responding to the action points arising from Issue Specific Hearings 3 and 4, NKDC recommends that the FCEMP includes a restriction that there is to be no audible noise from the proposed development at sensitive receptors between the hours of 18:00 – 19:00 [REP3-051]. Comment on whether the change made to NV-C1 of the FCEMP [REP4-008] would address your recommended restriction.	N/A
PE.3.02	Applicant UK Health Security Agency	**BESS safety** The SoCG between the applicant and the UK Health Security Agency [REP3A-020] identifies two areas under discussion. One relates to the identification of individual receptors relative to the BESS units for inclusion within future modelling at the detailed design stage. The other, that consideration should be given to all products of combustion, not just hydrogen fluoride as identified in ES Appendix 14-G (Unplanned Emissions Assessment) [APP-176]. Under the heading of pre-construction requirements, paragraph 5.1.5 of the Framework Battery Safety Management Plan (FBSMP) [REP3-030] explains that a site-specific plume analysis study based on the detailed design would be conducted to assess the environmental impact of a site incident for sensitive receptors within a 1km radius. Paragraph 5.1.5 goes on to state that production of a particulate matter and a visibility impact assessment on any transport links within a 1 km radius of the BESS area would also be included. That seems to contradict the applicant's response to the UK Health Security Agency's point in the SoCG (reference 4.1.2) about considering the potential off-site impacts for sensitive receptors of wider products of combustion (e.g. particulate matter) that could result during a fire. a. **Applicant** - Confirm whether production of particulate matter would be included within the plume assessment referred to in the FBSMP. b. **UK Health Security Agency** - Given the applicant's response in the SoCG confirming the proposed stand-off distances and that the plume assessment would include a map of receptors within 1km, clarify what other information and/or measures you would expect to be provided during the examination and/or within the FBSMP relating to the location of receptors.	As per paragraph 5.1.5 of the Framework BSMP **[REP3-030]**, site-specific plume assessments will be produced at the detailed design stage, which will include the production of a particulate matter and a visibility impact assessment on any transport links within a 1 km radius of the BESS area. The points of ongoing discussion with the UKHSA detailed in the SoCG **[REP3A-020]** (ref. 4.1.2) relate to the usefulness of particulate matter concentrations and impacts on visibility aspects of the future assessments and the appropriate assessment criteria to be applied, not whether the assessment will be undertaken. The use of AEGL-1 values is considered the most appropriate criteria for the assessment of short-term impacts for accidental emission scenarios, for the reasons set out in the SoCG **[REP3A-020]** (ref. 4.1.2).
PE.3.03	Applicant UK Health Security Agency	**BESS safety** A number of statements have been made in sections 2 and 3 of ES Appendix 14-G (Unplanned Emissions Assessment) [APP-176] about potential emissions in the event	The total capacity of a BESS scheme can vary, but the situation considered for a thermal event or fire relates only to the batteries within a single cabinet. There would be no fire or emissions affecting the remainder of the BESS and so the total capacity

Population Effects (PE)			
Question Number	**Question to:**	**Question**	**Applicant Response**
	NKDC LCC	of a BESS fire. For example, paragraph 2.1.7 states that only hydrogen fluoride would likely be present at concentrations of concern at distances of more than a few tens of metres from the fire. That is based on a report that included gas sample measurements from batteries subjected to external and internal ignition tests for BESS with a capacity of up to 100 kilowatt hours (Kwh). BESS of 100Kwh are markedly smaller than the proposed BESS, which would have a capacity of 480 megawatt hours. The distance of "tens of metres" is also referred to in the applicant's Health and Wellbeing Summary Statement (paragraph 3.9.22 of [REP3-047]). Comment on the reasonableness of the assumptions presented in the Unplanned Emissions Assessment [APP-176] on which the assessment and findings are based, including their applicability to the scale of BESS proposed.	or scale of the BESS is not the key consideration. The capacity of the proposed BESS is 480 Mwh in total, which takes the form of multiple cabinets. 100 Kwh is a typical capacity for a single cabinet used in a modern BESS, and as such is considered a reasonable assumption for the purposes of assessment. Appendix 14-G: Unplanned Emissions Assessment of the ES **[APP-176]** focuses on the total mass of pollutant emitted per hour and is derived from empirical data from fire tests. The conclusion, with regards to pollutants other than hydrogen fluoride being at concentrations that are only elevated enough to be of concern to first responders within 'tens of metres', is equally valid for a fire at a single 100 Kwh cabinet in isolation or the same cabinet as part of a larger 480 Mwh scheme.
PE.3.04	Applicant	**BESS safety** Paragraph 4.1.8 of ES Appendix 14-G (Unplanned Emissions Assessment) [APP-176] states that "*the FBSMP includes a commitment at section 5.1.5 to undertake a unplanned emissions assessment using consequence modelling methods to demonstrate that the impacts associated with an unplanned fire would not exceed the effects outlined in this report or cause any significance adverse health effects to the local community*". What action would be taken if the plume analysis study referred to in [REP3-030] showed that the impacts would exceed the effects outlined in [APP-176] or would exceed relevant public health exposure limit guidelines?	Whilst being noted as based on a detailed design, the future consequence modelling, as secured by the Framework BSMP **[REP3-030]** (ref. paragraph 5.1.5), would be undertaken specifically to further inform the detailed design process as relevant. This will be an iterative process ensuring that the final design meets the requirements of the DCO consent and results in no likely significant effects (as established by the ES). The Framework BSMP **[REP3-030]** (ref. paragraph 5.1.5) also states: "*Toxic gas emissions to sensitive receptors must be below relevant public health exposure limit guidelines when the battery system of a BESS is fully consumed (burnt out)*". As noted at paragraph 2.1.9 of the Framework BSMP **[REP3-030]**: "*third party fire and explosion testing should be utilised by the BESS Original Equipment Manufacturer (OEM) to demonstrate that structural integrity is maintained and toxic gas emissions to the closest receptors are below relevant public health exposure limits when the battery system is fully consumed (burnt out). An independent Fire Protection Engineer specialising in BESS will review all UL 9540A test results and any additional 3rd Party fire and explosion test data which has been provided and share conclusions with LFR*."
PE.3.05	Applicant UK Health Security Agency NKDC LCC	**BESS safety – health effects** Paragraph 3.9.26 of the Health and Wellbeing Summary Statement [REP3-047] refers to the information presented in ES Appendix 14-G (Unplanned Emissions Assessment) [APP-176]. Paragraph 3.9.26 states "*The assessment identified that safe human health thresholds relating to the inhalation of fumes from a BESS fire would be met 200m from the BESS. There are no residential receptors within this distance from the BESS infrastructure proposed, whether a distributed or centralised BESS is brought forward*". However, paragraph 2.3.5 in the FBSMP [REP3-030] states that the distributed BESS enclosures would be sited a minimum of 150m from residential structures offsite. Table 4 in [APP-176] identifies 150 to 200 metres as the indicative distance to achieve acute exposure guideline level (AEGL) -1 value for 100% of metrological conditions, based on 3 kilograms of hydrogen fluoride (HF) from a single cabinet fire. Paragraph 4.1.5 in [APP-176] identifies that *"… the specification reached in detailed*	Appendix 14-G: Unplanned Emissions Assessment of the ES **[APP-176]** refers to reported impacts in ranges. The 150-200m range cited in Table 4 for the achievement of acute exposure guideline level – 1 (AEGL-1) under all meteorological conditions, reflects the fact that when the wind blows from different directions the worst-case impacts, based on 5 years of hourly meteorological conditions, vary slightly. In a situation where a fire occurs during winds blowing towards the northeast, the AEGL-1 criteria is achieved within 200m, for the 3kg of HF scenario. For all other downwind directions an offset of 150m would provide the same level of protection. For the distributed BESS scenario, the offset to residential structures to the northeast is more than 200m, and in all other directions more than 150m. As such, the minimum distance commitment of 150m between distributed BESS and residential receptors, as secured in the Framework BSMP **[REP3-030]** (ref. paragraph 2.3.5) remains appropriate. The Applicant acknowledges that the Health and Wellbeing Summary Statement **[REP5-023]** (ref. paragraph 3.9.26) should have clarified that Appendix 14-G: Unplanned Emissions Assessment of the ES **[APP-176]** identified distances at

Population Effects (PE)			
Question Number	**Question to:**	**Question**	**Applicant Response**
		design will be required (by a requirement to the DCO) to be consistent with the parameters assumed in this study (i.e., 1kg to 3kg of HF from a single cabinet fire)…" Comment on the implications of the minimum distance of 150 metres referred to in the FBSMP for the consideration of health effects set out in the Health and Wellbeing Summary Statement.	which safe human health thresholds relating to the inhalation of fumes from a BESS fire would be achieved and confirmed that there are no residential receptors within these distances from the BESS infrastructure proposed (as secured by the Framework BSMP **[REP3-030]**), whether a distributed or centralised BESS is brought forward.
PE.3.06	Applicant UK Health Security Agency	**Electromagnetic fields (EMFs)** Comment on the potential for any EMFs arising from the presence of the proposed development to affect the operation of body worn/implanted medical devices.	Body worn/implanted medical devices, such as pacemakers, insulin pumps, and neurostimulators, are tested against standards such as those from the International Electrotechnical Commission (IEC) and guidance from bodies like the Medicines and Healthcare products Regulatory Agency. (MHRA). Such devices must tolerate common environmental EMFs, such as power lines, household wiring, appliances, and public infrastructure. As demonstrated by Appendix 14-F: Electromagnetic Fields Assessment of the ES **[APP-175]**, the infrastructure (underground cabling, overground cabling and Onsite Substation) of the Proposed Development fall below the maximum safe levels of exposure for electromagnetic and electric fields as outlined in the 1998 ICNIRP (International Commission on the Non-Ionizing Radiation Protection) guidelines. As such, it is considered that there is no potential for the Proposed Development to affect the operation of such medical devices.
PE.3.07	Applicant LCC	**Tourist Accommodation** LCC maintains its concerns about the effects of the proposed development on tourist accommodation, both individually and cumulatively with other schemes [REP3-048]. In terms of cumulative effects, the assessment in Chapter 12 of the ES (Socio Economics and Land Use) [AS-016] states that as it was anticipated that there would be no effect on the hotel, bed and breakfast, and inns accommodation sector from the proposed development, it would not make a meaningful contribution to any cumulative effect which may occur from other developments in the area. Table 12-25 in Chapter 12 of the ES presents the temporary accommodation capacity in a 30-minute rushhour drive time radius of the Order Limits (considered to be the worst-case scenario in paragraph 12.4.5 of [AS-016]). Table 12-25 shows that there would be limited spare capacity with the proposed development and a deficit in room availability during some months. That suggests that even a small increase in demand could lead to a shortage, which the proposed development would contribute to. Comment on whether there should be: a commitment to undertake monitoring of tourism accommodation usage by construction workers; and the implementation of management measures if required. If so, provide details of what that would involve and how it could be secured.	Chapter 12: Socio-economics and Land use of the ES **[AS-016]** presents an assessment of impacts on temporary accommodation both within a 30-minute drive time radius of the Order Limits and a 60-minute drive time radius respectively. The assessment focuses on potential impacts within a 60-minute drive time reflecting that, whilst worker accommodation and travel arrangements will be the choice of the construction/decommissioning contractor, it is expected that for cost-efficiency, and to minimise trips and impacts on the road network, larger hotels/accommodation typically found closer to the larger centres of population would be used. These include Lincoln, Newark-on-Trent and Grantham within the 30-minute drive time and Nottingham and Leicester within 60 minutes. Accommodation supply within 30 minutes' drive time was also identified to assess a worst-case scenario and provide an indication of capacity at a more local level to the Site reflecting that tourists to the area would be likely to stay in a more local radius. The 60-minute drive time radius is derived from the assessment of construction employment generation also set out in Chapter 12: Socio-economics and Land use of the ES **[AS-016]**, which assesses impacts on the labour market on the basis of available research and professional experience. As stated in Table 12-3, research by Chartered Institute of Personnel and Development (CIPD), in the 2018 Employee outlook 'Employee views on working life', found that 90% of national employees commuted for 60 minutes or less each way. A study completed by the Construction Industry Training Board in April 2019 found that nearly half (48%) of the construction workers in the South East of England, a comparable area in respect of transport accessibility, have travelled more than 50 miles away from their permanent home which would equate to around 90 minutes journey time. Based on consideration of this evidence, a 60 minute drive time was considered a reasonable and appropriate travel

Population Effects (PE)			
Question Number	**Question to:**	**Question**	**Applicant Response**
			time for construction workers to commute, reflecting the lower local and higher wider density of labour and capture construction workers likely to be travelling from a further distance from the Site. Reflecting this the same maximum journey time radius would apply to any workers staying in visitor accommodation as being a reasonable distance to commute to the Site. The drive time radiuses are themselves drawn using isochrone analysis available on mapping software ArcGIS Online which calculate all road segments that are reachable within a given time from each start point. This approach has been followed and considered robust on a number of solar PV DCOs, including Gate Burton Energy Park, Tillbridge Solar Project, both in Lincolnshire, Sunnica Energy Farm, East Yorkshire Solar Farm, Fenwick Solar Farm as well as for other consented DCO projects such as the Viking CCS Pipeline, also in Lincolnshire, London Luton Airport Expansion and others. As such Table 12-19 and Table 12-20 in Section 12.5 of Chapter 12: Socio-economics and Land use of the ES **[AS-016]** set out the number of rooms available within a 30 minute drive-time and 60-minute drive-time of the Proposed Development. As indicated in Table 12-19, within 30-minutes drive time there would be some spare capacity in some months and a deficit in room availability during some peak summer months after housing these workers. As indicated in Table 12-20, within 60 minutes there would be capacity across all months even during peak summer occupancy when there would be a surplus of 811 rooms available (17% of total rooms) after housing these workers. Where the relevant information is available, the Applicant has also considered the cumulative effect of other schemes in the local area together with the Proposed Development, each of which has a slightly different catchment area for accommodation. Capacity is considered sufficient to accommodate the workforce associated with multiple schemes operating concurrently. The Applicant has demonstrated that these workers can be accommodated locally and therefore, the overall effect was assessed as negligible and not significant. The Applicant also notes that the assessment has considered hotel, bed and breakfast and inns accommodation. Alternative accommodations (such as Airbnb, serviced apartments, etc.) were not accounted for in the assessment, but these types of accommodation could also cater for a portion of any demand generated and therefore further minimise any impact on accommodation provision. The Applicant therefore considers that no commitment to undertake monitoring of tourism accommodation usage by construction workers is required and accordingly, no management measures would be required.

2.10 Transport and Traffic Questions

Table 2-10: Applicant's Response to the Examining Authority's Traffic and Transport Questions

Transport and Traffic (TT)			
Question Number	**Question to:**	**Question**	**Applicant Response**
TT.3.01	Applicant LCC	**Framework Construction Traffic Management Plan (FCTMP) – condition surveys** The ExA notes the changes made to the FCTMP [REP3-032] 3 in response to the clarification sought by the ExA through the asking of ExQ2 TT.2.05. While that change to the FCTMP confirms that any defects to highway assets/verges during the construction of the proposed development would be made good, it does not explicitly identify who would have the responsibility for undertaking the reinstatement works. Comment on whether the FCTMP should be amended to identify the body responsible for any reinstatement works. The same point applies to the change made to the Framework Public Rights of Way Management Plan [page 22 in REP3-026].	The Applicant would have the responsibility for undertaking any reinstatement works. The text in the Framework CTMP **[REP3-032]** (paragraph 7.3.2) and the Framework PRoWMP **[REP3-026]** (paragraphs 3.3.7 and 3.4.5) have been updated (submitted to the Examination at Deadline 5A) to say *"….by the Applicant*" to confirm this.
TT.3.02	Applicant	**Abnormal indivisible loads (AIL) during the operation and maintenance period** Table 2 of the FOEMP [REP3-018] identifies the indicative life of key equipment. This includes an indicative design life for transformers of 30 to 40 years. Table C-2 of the Applicant's Response to the ExA's ExQ2 DCO.2.01 [REP3-045] identifies the "MV Transformers" as having a typical design life of 30-40 years (and being upgraded only if required) and the typical design life for the "*400kV power transformer*" as 40 to 60 years with no anticipated replacement. Clarify whether the reference to an AIL delivery under point (a) in paragraph 5.7.1 of the FCTMP [REP3-032] relates only to the delivery of the 400kV transformer rather than the MV transformers and if this is the reason for stating that no AILs would be required during the operation and maintenance period in paragraph 13.7.65 of Chapter 13 of the ES (Traffic and Transport) [REP3-010].	The reference to an AIL delivery under point (a) in paragraph 5.7.1 of the Framework CTMP **[REP3-032]** relates only to the delivery of the 400kV transformer. The MV transformers will not require transportation by an AIL, consistent with the wording in paragraph 13.7.65 of Chapter 13: Traffic and Transport of the ES **[REP3-010]**.
TT.3.03	Applicant	**Link 11– HGV volumes** In responding to the points made by an interested party in paragraphs 5.2.5 to 5.2.10 of [REP3A-037], the applicant in [REP4-018] has queried where the figure of 78 HGV movements has come from, as there would be no HGV movements in the AM and PM hours; the only larger vehicles travelling in those periods would be shuttle buses. Table 13-26 in Chapter 13 of the ES (Traffic and Transport) [REP3-010] identifies that in the AM and PM peak (07:00 to 08:00 and 18:00 to 19:00), 78 vehicle movements would be generated on Link 11. Appendix 13-D (Receptor Traffic Flow Tables) [APP-166] is consistent with that figure for total vehicle traffic flows. The table that presents HGV traffic flows in [APP-168] identifies 9 HGVs in the AM and PM peak for Link 11. Clarify which HGV movement figure is correct for Link 11 – the statement made in [REP4-018] that no HGVs would use Link 11 in the AM and PM hours or the figures presented in Table 13-26 of [REP3-010] and [APP-166]. If the former is correct,	The 78 movements shown for Link 11 in Table 13-26 include staff vehicle movements (i.e. cars) and shuttles. The 9 HGV movements shown in Appendix 13-D **[APP-136]** refer to the shuttles, because these were classified as HGVs for this assessment due to the size of vehicle.

Transport and Traffic (TT)			
Question Number	**Question to:**	**Question**	**Applicant Response**
		explain what the implications that has for the assessment presented in Chapter 13 of the ES.	
TT.3.04	Applicant	**Permissive Paths** Initially the applicant identified that it would provide approximately 9.5km of new permissive paths (for example, paragraph 5.3.15 of the Planning Statement [AS-098]). In responding to NKDC's answer to ExQ2 TT.2.03 regarding the Stepping Out Routes, the applicant explains that the layout plans have been updated to include additional permissive paths to facilitate the Stepping Out Routes, and that "*the updated length of proposed permissive paths to be provided for the operational lifetime of the proposed development is 10.2km. For context, the length of these two Stepping Out Routes together within the Order limits and excluding PRoW is 1.8 km. The net difference therefore is 8.4km*" [pages 89 and 90 in REP4-018]. The response goes on to say that "*any permissive paths proposed to be delivered as part of the proposed development will be secured for its operational lifetime and are therefore expected to be in place for 60 years, meaning the status "Retained" or "New" permissive path is considered unimportant*". a. Explain what the above means in terms of new lengths of permissive paths that would be delivered as part of the proposed development. For example, would 8.4km of new permissive paths be created? **b.** You have stated that the suggested additional permissive paths include two small deviations from the NKDC Stepping Out Routes, as illustrated on Figure 3-2A [REP4-006]. Explain the reason for those changes.	a. The net difference of 8.4km of permissive paths stated in the Applicant's Response to Deadline 3 and 3A Submissions **[REP4-018]** relates to the total quantum of proposed permissive paths within the DCO Site delivered as part of the Proposed Development (i.e. inclusive of any existing permissive paths and the existing Stepping Out Routes within the DCO Site; 10.2km) minus the quantum of the existing Stepping Out Routes within the DCO Site (i.e. 1.8km). This net difference serves to clarify the extent of permissive paths to be delivered as part of the Proposed Development (i.e. the net benefit) that are not currently part of the existing Stepping Out network. As set out in the Applicant's Response to Deadline 3 and 3A Submissions **[REP4-018]**, the total length of proposed permissive paths to be delivered as part of the Proposed Development – which is inclusive of the Stepping Out Routes within the DCO Site, which themselves utilise, in part, existing permissive paths – is 10.2km. This is the extent of the proposed permissive path network secured for the operational lifetime (60 years) of the Proposed Development. b. As set out in the Applicant's Response to Deadline 3 and 3A Submissions **[REP4-018]** (ref. p23), these two small deviations are: i. A proposed alternative route for the Morton and Tunman Wood Stepping Out Route which runs south and then east of Field 19 (as illustrated on the Landscape Mitigation Plan, which forms Figure 7.15-1 of the Framework LEMP **[REP5-017]**) as this is considered more favourable for walkers due to routing through open grassland or arable fields rather than using the existing farmer track which will have solar PV array (within Fields 18 and 19) on both sides; and ii. the removal of a small stretch of the Thorpe on the Hill Stepping Out Route which runs south of Field 9 (as illustrated on the Landscape Mitigation Plan, which forms Figure 7.15-1 of the Framework LEMP **[REP5-017]**) as this is not considered to be required to complete the circular walk. Users are able to use PRoW TOTH|6A/1 and the proposed permissive path east of Housham Wood Farm (see Figure 3-3 **[REP5-008]**) which routes through the open (managed arable) field north of Field 13, or TOTH|6/2, to complete a similar circular walk.

2.11 Water Environment, including Hydrology and Flood Risk

Table 2-11: Applicant's Response to the Examining Authority's Water Environment, including Hydrology and Flood Risk Questions

Water Environment, including Hydrology and Flood Risk (WE)			
Question Number	**Question to:**	**Question**	**Applicant Response**
WE.3.01	Applicant LCC Environment Agency	**Assessment of effects - water run-off, operational phase** **a) Applicant:** Page 85 of the Flood Risk Assessment [REP3-012] states that the research by Cook and McCuen notes boundary swales, as well as good, vegetated ground cover, is a suitable mitigation measure to counter any non-significant increase in runoff from a solar panel field. What consideration was given to boundary swales around the solar array areas to address runoff from the panels in addition to suitable planting? **b) All**: In responding to ExQ1 WE.1.05(b) concerning the monitoring of water run-off from the proposed solar panels, the applicant in [REP2-029] stated that this would be picked up as part of the monitoring identified in section 6.9 of the FSMP. The second bullet point in paragraph 6.9'1 of the FSMP [REP4-010] addresses monitoring of soil conditions and refers to the "created green space areas". Comment on whether the wording of the second bullet point in paragraph 6.9.1 of the FSMP is sufficiently clear to ensure that the monitoring would apply to the areas under the solar panels? If not suggest appropriate wording.	a. The Applicant notes that paragraph 4.5.6 of the Flood Risk Assessment (FRA) **[REP3-012]** states that surface water runoff mitigation will be provided in the form of edge/perimeter swales (i.e. boundary swales) to solar PV fields. Paragraph 7.1.6 of the FRA **[REP3-012]** further notes, with specific mention of the research by Cook and McCuen, that provision of boundary swales and native grassland and wildflower mix planting is adequate to manage the runoff from solar PV fields. As such, the FRA **[REP3-012]** clearly demonstrates the consideration of boundary swales around the solar array areas to address runoff from the panels in addition to suitable planting. Furthermore, paragraph 4.8.1 of the Framework Surface Water Drainage Strategy (FSWDS) **[REP3-016]** notes, in exceedance events, and where runoff cannot be contained in attenuation swales, perimeter swales will intercept excess runoff, reducing flood risk downstream. In addition to perimeter swales proposed for solar PV field runoff, to provide betterment to existing surface water flood risk to properties along The Avenue, near Morton, perimeter swales are proposed in fields 25 and 33 (as illustrated in Annex C: Drainage Strategy General Arrangement of the FSWDS **[REP3-014]**) and the undeveloped field in between, to intercept existing overland flow routes to reduce flood risk to the properties, as set out in paragraph 4.1.12 of the FSWDS **[REP3-016].** Table 12 in Section 4.7 of the FSWDS **[REP3-016]** sets out the available attenuation volumes in the three swales (within fields 25, 33 and the field between these two) during the 1 in 100 year plus 40% climate change event, demonstrating significant betterment to reducing flood risk. b. Paragraph 6.9.1 of the Framework SMP has been updated (to be submitted into Examination at Deadline 5A) to note the inclusion of planted areas beneath panels with regards to monitoring.

Appendix A Updated Maintenance Schedules

A.1.1 Table A-1 below shows the typical maintenance test and sampling rate required to maintain a solar farm. These tests would be carried out at the frequency stated depending on the exact warranty maintenance requirements of the manufacturers of the equipment. Some items may not be required depending on the exact equipment used for the construction at detailed design, for example the SF6 tests would not be required if SF6 free switchgear was used.

Table A-1: Solar PV and BESS Site Indicative Scheduled Maintenance Checklist

Work	Frequency
General site maintenance	
Verify status of vegetation in the site and planting around the site	Quarterly or as agreed in the Landscape and Ecological Management Plan
Check status of internal tracks and paths	Monthly
Check general drainage status of the site and monitor water puddles and muddy areas	Monthly
Check status of gates, hinges and padlocks	Monthly
Lubricate gates	Quarterly
Check status of fence and perimeter security	Monthly
Check status of spare parts container and storage facilities	Quarterly
Carry out stock take of spare parts on site and update records	Semi-annually
Grass cutting and weed maintenance	Quarterly or as agreed in the Landscape and Ecological Management Plan
Maintain the fire extinguishers according to local regulations	According to BSMP
PV modules	
Visual check browning, yellowing effect, hot spots, delamination, surface damages etc. (random 10% across site)	Annually
Visual check of stability, rigidity and fixing of the PV modules (10% per annum)	Annually

Work	Frequency
Visual check of connectors, junction boxes and cables (10% per annum)	Annually
Check shading on modules from vegetation or other elements	Quarterly
Check labelling of modules	Annually
Clean modules according to manufacturer's guidance	Biennially (every 2 years)
Aerial thermography of 100% of the modules	Annually
Mounting structure	
Visually inspect the structure for signs of corrosion, deformation, fatigue, chips, rust, etc.	25% of the site quarterly
Check condition of bolts and fixings	25% of the site quarterly
Check ground conditions for signs of erosion or subsidence	Quarterly
Visually check secure fixing of modules, for misalignment or evidence of slip	Quarterly
Verify adequate fixing of mounting clamps (10%)	Annually
Verify row labelling is present and clear	Annually
Check status of earthing terminations and apply corrosion protection	Annually
String inverters	
Carry out maintenance according to manufacturer's guidelines	As recommended
Visual check of all inverter components, switchgear and fuses	Quarterly
Check integrity of wiring and terminals	Annually
Check for any unusual noises and smells	Quarterly
Check controls and LCD screen operation	Quarterly
Thermographic inspection of electrical components under load	Annually
Check operation and maintain all cooling fans, filters, glycol levels if applicable, pressure and fault logs	Quarterly
Measure efficiency of DC/AC	Annually
Check settings and Maximum Power Point Trackers (MPPT)	Annually
BESS Containers	
Examine battery modules (damage, odour, leakage, connections)	6 Monthly
Inspect battery racks (damage, secure connections)	6 Monthly
Inspect BMS control box (enclosure integrity, connections)	6 Monthly

Work	Frequency
Inspect container enclosure (damage, corrosion, vegetation, ventilation)	6 Monthly
Check power distribution cabinet (wiring integrity)	Annually
Perform battery status assessments and operational tests	Annually
Inspect DC junction box (damage, connection integrity)	Annually
Examine auxiliary systems (wear, malfunction)	Annually
Maintain TMS (control system, refrigeration, coolant, components)	Annually
Conduct system performance testing	Annually
Inspect and verify grounding integrity	Annually
MV switchgear (up to 33kV)	
General inspection and cleaning of the equipment	Monthly
Visual inspection of SF6 gas levels if applicable	Monthly
Check status of connections and verify cable terminations (discolouration, heat damages)	Annually
Cleaning and greasing of mechanical parts	Annually
Verify operation of the equipment	Annually
Carry out maintenance according to manufacturer's guidelines	As recommended
MV transformers (up to 33kV)	
Visual inspection of equipment	Monthly, if the transformer is not enclosed
Check status of visual and acoustic indicators	Monthly, if the transformer is not in the enclosure
Check transformer for oil leaks	Annually
Functional checks of protection devices	Annually
Carry out Dissolved Gas Analysis (DGA), dielectric stiffness and humidity oil tests	Every 2 years or as per manufacturer's recommendations
Clean all surfaces and treat any corrosion	Annually
Check earthing connections and test earthing continuity	Annually
High Voltage Transformer (132-400kV)	
Visual inspection for oil leaks, corrosion, abnormal vibration or noise	Monthly

Work	Frequency
Check oil levels in main tank, conservator and OLTC compartments	Monthly
Check silica gel breather condition and replace if saturated	Monthly
Check oil and winding temperature indicators	Monthly
Check operation of cooling fans and oil pumps	Quarterly
Inspect radiators and cooling system for blockage or damage	Quarterly
Check Buchholz relay alarm/trip operation	Annually
Functional test of transformer protection schemes	Annually
Oil sampling for DGA	Annually
Oil dielectric strength, moisture and acidity tests	Annually
Thermographic inspection of bushings, connections and cooling equipment	Annually
Check condition of HV and LV bushings	Annually
Test On Load Tap Changer (OLTC) operation and inspect OLTC oil	Annually
Full transformer oil analysis	Every 2 years
Transformer winding resistance measurement	Every 3–5 years
Transformer turns ratio test (TTR)	Every 3–5 years
Insulation resistance and polarization index test	Every 3–5 years
Sweep Frequency Response Analysis (SFRA) if required	After faults or major events
High Voltage Switchgear	
Visual inspection of switchgear yard and structures	Monthly
Check condition of insulators for contamination or damage	Monthly
Check SF_6 gas pressure / density indicators (for GIS or breakers)	Monthly
Inspect earthing connections	Quarterly
Mechanical operation check of circuit breakers and disconnectors	Quarterly
Inspect drive mechanisms and lubrication	Annually
Functional testing of protection relays and trip circuits	Annually
Timing test of circuit breakers	Annually
Contact resistance measurement	Annually
SF_6 gas quality analysis (moisture, purity)	Annually

Work	Frequency
Thermographic inspection of busbars and connectors	Annually
Insulation resistance testing of switchgear	Every 3 years
Major breaker overhaul according to Original Equipment Manufacturer (OEM) guidance	Every 5–10 years
Protection, Control & Auxiliary Systems	
Check protection relay health and alarms	Monthly
Test Supervisory Control and Data Acquisition (SCADA) communication with protection relays	Quarterly
Battery bank inspection and voltage check	Monthly
Battery discharge test	Annually
Functional test of interlocking systems	Annually
Test trip circuits and breaker failure protection	Annually
SCADA and monitoring equipment	
Check status of site hardware equipment	Annually
Check status of Uninterruptible Power Supply (UPS)	Quarterly
Check electrical connections and power supply	Quarterly
External cleaning of the SCADA server	Quarterly
Check data integrity	Quarterly
Check SCADA for alarms (e.g. CPU usage, consistent with monitoring portal)	Quarterly
Check data plausibility (weather station, pyranometers)	Quarterly
Check inclination of pyranometers	Quarterly
Clean pyranometers, albedometers and reference cells with a soft damp cloth	Monthly
Check status and cleanliness of weather stations	Monthly
Check mounting and anchoring of sensors	Monthly
Calibrate sensors and pyranometers according to manufacturer's recommendations	As recommended
Verify status of data transmission and backup status	Quarterly
Onsite substation	
Check status of building for cracks, damages, deformations or paint flakes	Quarterly
Check for signs of rodents	Quarterly
Check status of gates and access	Monthly
Check the state of safety equipment and firefighting equipment	Quarterly

Work	Frequency
Check the correct operation of lighting and emergency lighting	Quarterly
Check internal temperature of the rooms	Monthly
Check status of HVAC units and correct functioning	Monthly
Carry out annual maintenance of HVAC units	Annually
Check status of operational meters and confirm readings (if accessible)	Quarterly
Carry out Electrical Installation Condition Report (EICR) tests according to BS7671 standards	Every 3 years
CCTV system	
Visual inspection of the security system: cameras, columns, sensors	Monthly
Check correct time and camera visualization in CCTV servers	Monthly
Confirm with Alarm Receiving Centre (ARC) data reception	Monthly
Check camera cleanliness and clean if required	Quarterly
Check earthing connections and earthing continuity	Annually
Carry out site walk test with ARC	Annually
Health and Safety	
Verify presence of health and safety signage in the buildings and replace as necessary	Semi-Annually
Verify "Danger of Death" and "CCTV in operation" signage on the fence, if needed	Quarterly

A.1.2 Table A-2 below shows the anticipated replacement rates of the components of the solar farm; these are based on the design lifetimes assessed during the Environmental Impact Assessment process and highlights typical replacement rates both for the operation periods of years 0-29 and years 33-60 (typical operational periods).

There is also a separate estimate for the "repowering period" of years 29-33 where replacement activities are increased to account for the phased replacement of modules over an indicative five-year repowering period. The total HGV trips generated below in the table is 200 HGV deliveries of modules and 10-20 HGV deliveries of solar station equipment (MV inverters and MV transformers). This figure is well below the assessed level of 20 HGV deliveries a day as assessed within **Chapter 13 Traffic and Transport [REP3-010]** of the ES as the time and work required to install ~20% of modules would occur over a number of months.

Table A-2: Solar PV and BESS Repowering Plan

Equipment	Typical Design Lifetime	Action	Notes including HGV trips required	Anticipated Replacement Rate Years 0-29	Anticipated Replacement Rate Years 29-33	Anticipated Replacement Rate Years 33-60
PV Modules	25–40 years	Replace around Year 30	Warranted Efficiency degradation (~0.4% per year) and new technology provides higher output. 1 HGV trip for 0.1% replacement for current modules, efficiency increase will reduce this.	Replacement only due to equipment failures typically ~0.05% per year. 1 HGV trip every two years	Repowering phase. ~20% replaced per year depending on exact quantities per area of replacement. ~200 HGV trips per year	Replacement only due to equipment failures typically ~0.05% per year. 1 HGV trip every two years
BESS Containers	15-20 years	Replace around year 20 and 40	Augmentation may occur in any year where extra racks are added to maintain capacity as cell degrade. Replace around year 20 and 40 with new BESS container	Estimate replacement round years 20/21. Typically this can be phased over a couple of years to reduce disruption. Estimated ~185 HGV trip a year in year 20 and 21	This falls within the normal operating phase of the BESS so no HGV movements would be likely in this time period.	Estimate replacement round years 40/41. Typically this can be phased over a couple of years to reduce disruption. Estimated ~185 HGV trip a year in year 40 and 41
MV Inverters / Central Inverters	15–20 years	Replace from Year 20 if required	New units typically improve conversion efficiency and grid compliance. Single	Estimate 1 per year – more likely partial replacement of components	Estimate 10 - 20 per year at end of life within areas being repowered	Estimate 1 per year – more likely partial replacement of components

Equipment	Typical Design Lifetime	Action	Notes including HGV trips required	Anticipated Replacement Rate Years 0-29	Anticipated Replacement Rate Years 29-33	Anticipated Replacement Rate Years 33-60
			HGV trip per replacement			
DC Cables	25–30 years	Inspect / Partial replacement	Replace damaged or cables with degraded insulation, confirmed via IR testing. Not delivered by HGV	Replace only if required	Replace only if required	Replace only if required
AC Cables	30–40 years	Inspect	Replace if LV/HV AC cable testing fails. Not delivered by HGV	Replace only if required	Replace only if required	Replace only if required
Combiner Boxes	20–25 years	Replace	Modern units often include improved monitoring and protection. Not delivered by HGV	Replace only if required	Replace only if required	Replace only if required
Monitoring & SCADA System	10–15 years	Replace / Upgrade	Software obsolescence and cybersecurity improvements. Not delivered by HGV	Replace only if required	Replace only if required	Replace only if required
Weather Stations (pyranometers, sensors)	10–15 years	Replace	Sensor accuracy deteriorates. Not delivered by HGV	Replace only if required	Replace only if required	Replace only if required

Equipment	Typical Design Lifetime	Action	Notes including HGV trips required	Anticipated Replacement Rate Years 0-29	Anticipated Replacement Rate Years 29-33	Anticipated Replacement Rate Years 33-60
Mounting Structure	35–40 years	Inspect / Reinforce	Usually retained unless corrosion or structural fatigue occurs. Not delivered by HGV	Minimal replacement of corroded components	Minimal replacement of corroded components	Minimal replacement of corroded components
Earthing System	30+ years	Inspect and upgrade	Ensure compliance with updated electrical standards. Not delivered by HGV	Upgrade only if required	Upgrade only if required	Upgrade only if required
MV Transformers (e.g., 33 kV)	30–40 years	Condition-based replacement	Oil analysis and insulation testing determine replacement. Combined with central inverter replacement.	Upgrade only if required	Upgrade only if required	Upgrade only if required
400 kV Power Transformer	40–60 years	Refurbish / Life extension	Replace bushings, oil regeneration, OLTC overhaul.	None anticipated	None anticipated	None anticipated
HV Circuit Breakers	30–40 years	Major overhaul or replace	Especially for SF_6 breakers depending on operating cycles.	None anticipated	None anticipated	None anticipated
Disconnectors & Busbars	40+ years	Inspect and refurbish	Replace insulators and mechanical components.	None anticipated	None anticipated	None anticipated

Equipment	Typical Design Lifetime	Action	Notes including HGV trips required	Anticipated Replacement Rate Years 0-29	Anticipated Replacement Rate Years 29-33	Anticipated Replacement Rate Years 33-60
Protection Relays	15–20 years	Replace	Digital relays become obsolete. Not delivered by HGV	Upgrade only if required	Upgrade only if required	Upgrade only if required
Fire Detection / Security / CCTV	10–15 years	Replace	Technology upgrade. Not delivered by HGV	Replace only if required	Replace only if required	Replace only if required