One Earth Solar Farm

Volume 9.0: Other Post-Submission Documents [EN010159]

Applicant's Responses to Relevant Representations

EN010159/APP/9.3
July 2025
One Earth Solar Farm Ltd

Contents

Responses to representations from local authorities 1

Responses to representations from parish councils 262

Responses to representations from other statutory consultees 318

Responses to representations from members of the community 518

Additional Information on Cultural Heritage 635

Local Authorities

Relevant Representation Number	Representation	Applicant Response
Air Quality		
AS.002	Dust during Construction: The construction phase could generate dust, which could adversely affect air quality and the health of nearby residents. Measures \to mitigate dust emissions, such as water spraying, dust screens, and monitoring, should be thoroughly evaluated and implemented.	As presented in Environmental Statement (ES) Chapter 13 – Air Quality [APP-042], a construction dust risk assessment was undertaken to identify the level of mitigation required to ensure there are no significant effects from dust and particulate emissions during construction. The mitigation measures, which are set out in ES Volume 2: Appendix 13.5 [APP-137], are included in, and secured by, Table 3.9 of the Outline Construction Environmental Management Plan (oCEMP) [APP-176]. Requirement 13 of the Draft DCO [APP-007] secures that prior to construction, a CEMP must be submitted to and approved by the relevant planning authority.

Relevant Representation Number	Representation	Applicant Response
RR.135	Turning to Air Quality NSDC are content that Chapter 13 provides a detailed consideration of the potential air quality and dust soiling impacts relating to the proposed development. The assessment uses appropriate assessment methodology and considers the potential effects of the development in terms of emissions and soiling as negligible and the impact as not significant during construction, operational and decommissioning phases. This assessment is reliant on best practise dust mitigation being employed and the measures proposed are presented in an Outline Construction Environmental Management Plan (OCEMP). Whilst NSDC are generally content with the majority of measures proposed, we would expect to be provided with 6 monthly (as a minimum) summary updates of complaints, significant incidents, and logs in relation to air quality and dust rather than upon request as is specified in the OCEMP.	The construction dust mitigation measures, which are set out in ES Volume 2: Appendix 13.5 [APP-137], are included in, and secured by, Table 3.9 of the Outline Construction Environmental Management Plan (oCEMP) [APP-176]. At this stage, the CEMP is in outline. Prior to construction, the final measures will be agreed upon with the council before the final CEMP is submitted, as per Requirement 13 of the Draft DCO [APP-007]. The request to be provided with 6 monthly updates on complaints and significant incidents has been included in the oCEMP submitted at Deadline 1.

Relevant Representation Number	Representation	Applicant Response
	At an overall level, NSDC accept the findings of the assessment, based on work undertaken thus far. Notwithstanding this, we note that a dust management plan is an area of further work that will be prepared, and we look forward to the opportunity to comment on this document in due course.	
Alternatives & Site Selection		

Relevant Representation Number	Representation	Applicant Response
RR.135	In respect of Chapter 4 (Alternatives and Design Evolution), firstly we consider the section on 'need for the proposed development' is not relevant to the context of this chapter, which should focus its content on the regulatory requirement to demonstrate the consideration of 'main alternatives.' In this regard, whilst we note that Chapter 4 refers to more detail being available in the Planning Statement and other documentation, NSDC would expect a clearer indication of the main alternative areas that were considered. For example, paragraph 4.5.3 refers to a 10km search area within proximity of the grid connection point at High Marnham, with the following paragraphs containing a general description of areas of land that appear to be in more immediate proximity of the Order Limits. Given the ES is the document that has a regulatory obligation to detail alternatives, this should be clearly presented within Chapter 4, with more evidence of other sites considered. It would also be beneficial to the understanding of this topic area if the information were presented in plan form, which for example details alternative sites considered, within the context of environmental constraints and designations, in comparison to the proposed development.	The starting point for the Order Limits was the proximity to the High Marnham grid connection, and a 10km search area was then adopted from the point of connection to identify the preferred site. All of the land within this radius was considered, rather than identifying specific alternative sites. The Site Selection Assessment appended to the Planning Statement [APP-168] sets out this methodology and sets out the site selection principles, which concludes that this site as preferred on balance considering the site selection principles and environmental considerations. The consideration of alternative technologies, and alternatives design solutions have been considered as set out in Chapter 4 Alternatives and Design Evolution [APP-033].

Relevant Representation Number	Representation	Applicant Response
RR.135	NSDC notes that the Planning Statement does not contain an appraisal of NSDC local plan policies, with pages 577 – 605 of the Policy Compliance Documents listing policies in the NSDC Amended Core Strategy (2019) only. As noted in our response to Statutory Consultation the applicant has still not made any reference to the current version of the ADMDPD as adopted in July 2013, which remains part of the 'Development Plan.' NSDC will identify all of the relevant local planning policy context at the point that it submits its Local Impact Report (LIR) to the Examining Authority.	The Applicant has provided an assessment of the Proposed Development against the NSDC local plan within the Policy Compliance Document [APP-169]. The Applicant has reviewed the ADMDPD (adopted in July 2013) and this can be found in paragraph 6.5.1 of the Planning Statement [APP-168]. Following a review of the document the Applicant considered there to be no allocations of relevance. In addition the Planning Statement also assessed the emerging version of this plan and confirmed that *"NSDC is completing a review of the Amended Allocations & Development Management DPD. The Draft Amended Allocations & Development Management DPD was submitted to the SoS on the 18th January 2024 and was examined in public in November. However, the outcome of the examination is not yet published and whilst the plan is at an advanced stage of preparation, there are unresolved objections to amended versions of the above policies emerging through that process. Therefore, the level of weight which those proposed new policies can be afforded is currently limited. As such, the application has been assessed in-line with policies from the adopted Development Plan."* The outcome has still not been published but the Applicant is monitoring progress.

Relevant Representation Number	Representation	Applicant Response
RR.135	The loss of BMV Land	The Applicant has undertaken a site selection process during which the provisional DEFRA mapping showed that the majority of the land within the search area was Grade 3, with pockets of Grade 2 and 4. The site selection process resulted in the Order Limits being selected as a suitable site. With complete avoidance of BMV land not possible in a way that still achieves the objectives of the Proposed Development, a key focus in the design of the Proposed Development was on minimising impacts on BMV as much as possible. The Applicant has taken steps to avoid and minimise use of BMV land, however, there does still remain BMV land within the Site. The Applicant has set out its justification for this in the application documents. It is explained within Environmental Statement Volume 2, Chapter 4: Alternatives and Design Evolution [APP-033] that other potential locations were not of significantly better BMV profile in comparison to the Order Limits, resulting from detailed ALC surveys. As the Order Limits have evolved, some land parcels of ALC Grade 2 have been removed in seeking to avoid and minimise impacts to BMV land.

Relevant Representation Number	Representation	Applicant Response
AS.002	Whilst it is acknowledged that the proposal would be operational for a period of 60 years, The District Council are concerned that within the Order limits, the proposal would see a total loss at 53.3% of surveyed land classified as BMV agricultural land. Given that some infrastructure, for example cabling, would be permanent and remain in place after the decommissioning period, some loss of BMV agricultural land would be permanent.	The Applicant has undertaken a site selection process during which the provisional DEFRA mapping showed that the majority of the land within the search area was Grade 3, with pockets of Grade 2 and 4. The site selection process resulted in the Order Limits being selected as a suitable site. The Applicant has since taken steps to avoid and minimise use of BMV land, however, there does still remain BMV land within the Site. The Applicant has set out its justification for this in the application documents. It is explained within Environmental Statement Volume 2, Chapter 4: Alternatives and Design Evolution [APP-033] that other potential Order Limit locations were not of significantly better BMV profile in comparison to the Order Limits, resulting from detailed ALC survey. As the Order Limits have evolved, some land parcels of ALC Grade 2 have been removed in seeking to avoid and minimise impacts to BMV land. With complete avoidance of BMV land not possible in a way that still achieves the objectives of the Proposed Development, a key focus in the design of the Proposed Development was on minimising impacts on BMV as much as possible.

Relevant Representation Number	Representation	Applicant Response
		In terms of the potential permanent loss of BMV as a result of infrastructure that will not be removed at the decommissioning phase, the only land that will be permanently removed from agricultural use would be the ecological enhancement areas which comprises approximately 120 ha of land, which is only a very small percentage of the BMV across Lincolnshire and Nottinghamshire. As detailed in the oDEMP [APP-178], cables left in situ after decommissioning would not impact the future agricultural use of the land, provided they were buried at a minimum 0.9m depth. Cables buried at least 1m below ground are expected to be left in place, and that approach is based on the Applicant's understanding (informed by use of cabling elsewhere and the approach taken on other similar schemes) that these cables would be unlikely to be considered as waste if left in the ground.

RR.032	WLDC raises concerns regarding the cumulative loss of agricultural land currently available for the production of food within the District. With regard to the OESF, WLDC notes that there is no commitment for land upon which panels are sited to also be made available for the grazing of livestock for the purpose of food production. WLDC therefore deems that the assessment and determination of this application must be carried-out on the basis that all of the land will be lost for the purpose of food production for the 60 year lifespan of the Scheme. WLDC is also concerned regarding the loss of Best Most Versatile Land (BMV) that will be lost as a consequence of the OESF project. The applicant's assessment demonstrates that soils and agricultural land of very high sensitivity (Grade 2 land) and high sensitivity (Grade 3a land) equate to a total area of 660.9ha, which constitutes 53.3% of the surveyed land within the Order Limits (46.9ha of the whole Order Limits. Both of these land classifications apply to the parts of the project located within the West Lindsey District. National Policy Statement EN-3 (NPS EN-1) states that, where the use of agricultural land is shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of BMV agricultural land where possible (para. 2.10.29). It is clear that the	A detailed assessment of possible cumulative impacts relating to soil and agricultural land has been completed in Chapter 8: Land and Soils [APP-037], with consideration of cumulative effects provided in Chapter 18: Cumulative Effects [APP-047]. This assesses the quantities of BMV land that will be taken out of use due to other developments (both permanently and temporarily) in Lincolnshire and Nottinghamshire. The inter-project cumulative effects are considered minimal due to their temporary nature. In terms of animal grazing on the land, paragraph 11.1.43 of the Planning Statement [APP-168] notes that *"while the conditions which would allow for grazing would be delivered, the Applicant is unable to make a commitment that grazing will occur as the usual process would be for a farmer with animals to graze to approach a landowner to seek agreement to graze animals on their land, not the other way around."* The Applicant will continue to discuss with the relevant landowners on this and provide an update during examination. NPS EN-3 has been complied with at site selection stage, where the poorer quality land was preferred to higher quality land, whilst noting that EN-3 confirms that land type should not be a predominating factor in determining the suitability of the site location. During the site selection process, the provisional DEFRA mapping showed that the majority of the land within the search areas was Grade 3, with pockets of Grade 2 and 4. The site selection process resulted in the Order Limits being selected as a suitable site.

Relevant Representation Number	Representation	Applicant Response
	OESF has not avoided the loss of higher quality land for over 60 years and this must be weighed negatively in the planning balance.	The Applicant has since taken further steps to avoid and minimise use of BMV land, however, there does still remain BMV land within the Site. The Applicant has set out its justification for this in the application documents. It is explained within Environmental Statement Volume 2, Chapter 4: Alternatives and Design Evolution [APP-033] that other potential Order Limit locations were not of significantly better BMV profile in comparison to the Order Limits, resulting from detailed ALC survey. As the Order Limits have evolved, some land parcels of ALC Grade 2 have been removed in seeking to avoid and minimise impacts to BMV land. With complete avoidance of BMV land not possible in a way that still achieves the objectives of the Proposed Development, a key focus in the design of the Proposed Development was on minimising impacts on BMV as much as possible.

RR.077	Agricultural Land use The potential impacts on Best and Most Versatile (BMV) agricultural land in respect of this scheme and cumulatively with other projects that are emerging/known about in Lincolnshire are of concern to the Council. The Council will seek to protect high quality agricultural land in Lincolnshire (Grades 1, 2 and 3a) from development in accordance with its Energy Infrastructure Position Statement adopted 5 December 2023. https://lincolnshire.moderngov.co.uk/documents/s60096/Energy%20Infrastructure%20Position.pdf Lincolnshire has the largest combinable crop output of any UK county, with about 12% of England's arable crop area. Its combination of climate, soil type and topography make the county ideal for a variety of crops with 437,591 ha of land given over to agriculture and horticulture in Lincolnshire, and producing by value circa 10% percent of England's cereal, 25% of vegetables and 14% of industrial crops (sugar beet, oil seed rape and protein crops). This has led to the area having the UK's leading concentration of fresh produce processors, traders and technology suppliers. This high level of production is vital to the county's economy, with a total crop output of over £1,564 million and a total livestock output of £555 million in 2023.	A detailed assessment of possible cumulative impacts relating to soil and agricultural land has been completed in Chapter 8: Land and Soils [APP-037], with consideration of cumulative effects provided in Chapter 18: Cumulative Effects [APP-047]. This assesses the quantities of BMV land that will be taken out of use due to other developments (both permanently and temporarily) in Lincolnshire and Nottinghamshire. Only approximately 120 ha will be permanently removed from agricultural land use (for ecological enhancement areas) and 534.67 ha will be used temporarily (for solar PV infrastructure, BESS and substations) and will return to agricultural land use after the operational stage of the Proposed Development. The area of BMV agricultural land within Lincolnshire is estimated to be in the region of 402,900 ha, as such there is only a very small percentage of this BMV that will be affected (based on the areas of BMV land within the Order Limits, the temporary change in land use as a result of the Proposed development will affect 0.03% of BMV land within Lincolnshire). To meet our national targets for solar energy would only require 0.3% of the total land in the UK, creating a minimal impact on food production.

Relevant Representation Number	Representation	Applicant Response
	To preserve fresh produce and minimise supply chain distance, highly productive food hubs have built up in the south of the county. The importance of this sector for the local economy is reflected in the number of jobs it generates with an agricultural workforce of 12,000. The overall Agricultural Land Classification (ALC) findings for the One Earth proposal are set out in the ES Chapter 8: Land and Soils [APP-037] at 8.6.14 identifies that 19.7% of the site is Grade 2, and 33.6% are Grade 3a providing a BMV for the site of 53.3% (660.9 Ha). 8.6.18 states that 'it is anticipated that some areas of habitat and biodiversity mitigation and enhancement will remain in-situ'. Whilst the loss of BMV land used for solar panels is considered 'temporary', 60 years is however a long period and there is also the potential for land to be permanently lost to habitat and mitigation. Figures are not provided within ES Chapter 8: Land and Soils, or ES Chapter 6: Biodiversity which detail the amount of BMV land on which biodiversity and green infrastructure mitigation is proposed. The potential impacts on agricultural land both in respect of this scheme and cumulatively with other NSIP solar projects that are consented and emerging in Lincolnshire will be raised in the LIR and written submissions.	

Relevant Representation Number	Representation	Applicant Response
AS.002	As this is a cross boundary application site covering three local authorities, the Local Planning Authority request a period of at least 13 weeks to consider all applications to discharge conditions. Also that the proposed application fees reflect officers time spent reaching a decision on those matters.	In terms of the discharge period applied under the Schedule, the Applicant maintains the ten-week period should be retained as the Proposed Development is a NSIP for which there is a critical national priority. An eight to ten week period is fairly standard for energy DCOs and is the same or longer than a number of others (for example, Heckington Fen, East Yorkshire, Sunnica, West Burton, Gate Burton, and Mallard Pass). Moreover, PINS Advice Note 15 attaches standard drafting in relation to discharge of certain approvals, which sets out a 42-day decision making period, and the Applicant is proposing a timeframe in excess of this. Paragraph 2 of Schedule 15 of the draft DCO [APP-007] does not preclude a longer period than ten weeks being agreed between the parties, and in practice the Applicant is likely to agree to additional time rather than risk the Councils refusing the application. However, given many of the applications for discharge of requirements should be able to be dealt with within ten weeks, the Applicant would prefer the default position to require a shorter time, with the option to extend.

Relevant Representation Number	Representation	Applicant Response
RR.032	Schedule 15 – Article 45 – procedure for discharge of requirements.	In terms of the discharge period applied under the Schedule, the Applicant maintains the ten-week period should be retained as the Scheme is a NSIP for which there is a critical national priority. An eight to ten week period is fairly standard for energy DCOs and is the same or longer than a number of others (for example, Heckington Fen, East Yorkshire, Sunnica, West Burton, Gate Burton, and Mallard Pass). Moreover, PINS Advice Note 15 attaches standard drafting in relation to discharge of certain approvals, which sets out a 42-day decision making period, and the Applicant is proposing a timeframe in excess of this. Paragraph 2 of Schedule 15 of the draft DCO [APP-007] does not preclude a longer period than ten weeks being agreed between the parties, and in practice the Applicant is likely to agree to additional time rather than risk the Councils refusing the application. However, given many of the applications for discharge of requirements should be able to be dealt with within ten weeks, the Applicant would prefer the default position to require a shorter time, with the option to extend.

Relevant Representation Number	Representation	Applicant Response
	The procedure proposed for the approval of subsequent details is also a matter of significant interest for WLDC. The NSIP in its own right is a complex EIA project, where a number of details are proposed for approval post-consent following a further detailed design process by the applicant. Due to the significant nature of the environmental impacts to which these subsequent details relate, the requirement to consult technical consultees (including statutory bodies) to inform decision making and that the importance of mitigating impacts for local communities results in WLDC requiring sufficient timescales within which to determine them. Recognising that WLDC may be in a position where significant amounts of information relating to four or more different projects could be submitted for approval concurrently, it is clear that enabling reasonable time to assess, consult and determine complex details in the public interest is essential. WLDC's position is that a determination period of 13-weeks is proportionate due to the proliferation of submissions for approval likely to be sought by all other NSIP projects.	

Relevant Representation Number	Representation	Applicant Response
Biodiversity		
AS.002	Bassetlaw District Council's Lead Ecologist has been consulted on the Biodiversity Chapter and relevant appendices of the Environmental Statement (ES) and is in agreement with the comments included in the relevant representations made by Nottinghamshire County Council.	The Applicant notes this comment.
RR.135	Overview - NSDC have reviewed Chapter 6 in respect of Biodiversity Impacts and a number of the associated Appendices related to this chapter, as well as other ES chapters and/or Appendices related to those chapters and as such, we would wish to make the following observations.	The Applicant acknowledges this statement and provides responses to individual points below.

Relevant Representation Number	Representation	Applicant Response
	It is understood that the some of the final design of the proposals could change with some ongoing ecology surveys, and therefore, additional information will be provided if the Development Consent Order (DCO) is granted in line with the requirements of the draft DCO. We commend the ongoing design evolution through the integration of ecological assessments to refine areas with potentially significant effects. However, we are concerned that the ES has not appropriately quantified the baseline habitats, specifically in relation to the BNG assessment and that the loss of higher value vegetation during decommissioning has not been adequately considered.	
RR.135	Assessment Methodology - Methodology is considered within sections 6.3-6.5 of Chapter 6 of the ES and within the accompanying Technical Appendices. At this stage, because the detail of some elements is not fixed worst-case scenario approach has been taken, and we agree with this approach.	The Applicant welcomes this statement.

Relevant Representation Number	Representation	Applicant Response
RR.135	LWS Guidelines Local Wildlife Sites (LWS) are recognised by central government as an important tool in promoting sustainable development and protecting biodiversity. We recommended in our scoping consultation response dated 01/12/23 that the Nottinghamshire LWS Handbook5 should be used as part of the assessment process to determine ecological importance. As this has not been included the applicant should provide justification as to why this was not included.	The Applicant will update Table 6.8 of Chapter 6 Biodiversity [APP-035] at Deadline 1. The justification of the importance of each ecological feature will make reference to the Nottinghamshire LWS Handbook and the Local Wildlife Site Guidelines for Greater Lincolnshire.

Relevant Representation Number	Representation	Applicant Response
RR.135	Aspects Scoped Out of the Assessment Chapter six states at paragraph 6.6.10 that no veteran trees were identified within the Order Limits (OL) during the desk study, with five located adjacent to the site within the search radius. Para 3.11.3 of TA 6.3 and section 3.1.5 of TA 2.2 (ES Response to PINs Scoping Opinion) also state that there are no veteran trees within the OL. However, TA 11.6 (Arboricultural Report) states under section 3.2 (General Observations) that 15 trees were classified as veteran features which are listed in Table 2. It is acknowledged that there are several different definitions/classification systems for veteran trees, however the applicant should confirm whether any mature trees are considered to be veteran under the UKHab classification system and address these specific receptors where significant effects are likely to occur. These would also need to be incorporated into the BNG assessment within the baseline habitats and scoped into the ES Chapter if any confirmed trees were to be impacted by the proposals.	The Applicant will update Chapter 6 Biodiversity [APP-035] to include an assessment of veteran trees based on the outputs of Appendix 11.6 Arboricultural Report [APP-134]. The updated Chapter 6 Biodiversity [APP-035] will be provided at Deadline 1. This assessment will include an environmental measure (in Table 6.6) that confirms the implementation of the mitigation as described within Natural England's and Forestry Commissions standing advice – *Ancient woodland, ancient trees and veteran trees: advice for making planning decisions*.

Relevant Representation Number	Representation	Applicant Response
RR.135	Baseline Conditions Statutory and Non-Statutory Designated Sites - Whilst Figure 3.1 does show the location of Ecological Designations this is of poor quality. It does not include any zones of influence and does not label the designations. It is suggested that an OS map base is used and that this is split onto multiple Figures at different scales to display the require information.	Figure 6.1b in ES Volume 3 - Figures 6.1-6.2 [APP-051] shows the ecologically designated sites, with labels, within the study and zone of influences for biodiversity. The 10km buffer and zone of influence from the Order Limits for international designated sites is not included, as there are no designated ecological sites within 10km of the Proposed Development. Figure 6.1 is referred to in Chapter 6 Biodiversity [APP-035]. Figure 6-1B will be updated at Deadline 1 with revised veteran tree locations.
RR.135	Habitats and Vegetation - Section 2.1 of TA 6.3 provides details of the Phase 1 habitat survey undertaken. As standard practice the botanical species present within each habitat are usually quantified using a relative abundance scale such as DAFOR to provide context of species presence and distribution to aid habitat classification. Whilst some attempt at quantification has been provided within the habitat descriptions, we do not consider "locally common" to be a recognised term and that this could be misleading in the context of rare plants that can have higher localised distributions which form important resources.	A full botanical survey, such as a National Vegetation Classification (NVC) survey was not undertaken as the habitats present did not, with some small exceptions, constitute habitats of principal importance (e.g. hedgerows). NVC is not typically undertaken across development footprints unless the habitat is considered to be of particular interest. Phase 1 habitat survey and latterly UK Habitats Classification survey is the mainstay to underpin Ecological Impact Assessment. Neither of these methods constitutes a full botanical survey, and neither are they designed to be. The habitat surveys undertaken were those typically used to classify habitats for the purpose of planning:

This section also states that …" It while every effort has been made to provide a comprehensive description of the Site, this survey did not constitute a full botanical survey." The applicant should clarify why a full botanical survey was not undertaken and justify how they can be confident in the habitat classifications and condition assessments. The key on Figure A-2 Baseline Habitats within TA 6.3 should be revised to differentiate between bramble and mixed scrub and to distinguish between the different hedgerow habitats described at 3.10.1. Additionally, it appears that 'Other lowland acid grassland' may have been included within the key in error, and the applicant should provide clarification. It is suggested that the plan is also updated to include hedgerow labels, in particular to locate the hedgerows that have been classified as 'important' under the Hedgerow Regulations and those that support ditches. Watercourses should also be clearly labelled. Whilst it is acknowledged that the vast majority of trees within the OL reside within the boundary hedgerows, tree belts and woodlands, from a review of the drawings in TA 11.6 it appears that there are a small number of free-standing mature trees within fields such a T447. These should be quantified within the baseline habitats of the BNG assessment and there should be consideration for their inclusion at Table 6.4 of Chapter 6. To prevent any potential confusion, it is suggested that the results section of TA 6.3 references the equivalent UKHabitat classification in addition to the Phase 1 habitat survey

1. Phase 1 habitat survey, with sufficient information gathered to translate results to the UK Habitats Classification;
2. Habitat condition assessment;
3. Hedgerow assessment (detailed survey focused on the most common habitat of principal importance present across the Order Limits).

Although it is acknowledged that the DAFOR scale can be useful, the vast majority of habitats present are intensively farmed and of limited biodiversity interest.
The Applicant will update both Chapter 6 Biodiversity [APP-035] and Appendix 6.3 Extended Habitat Survey [APP-086] to remove the single reference of 'locally common' in each.

Reference will also be made to individual rural trees and UK Habitats Classification status will also be described in an update of Appendix 6.3 Extended Habitat Survey.

Appendix 6.10 Biodiversity Net Gain Assessment [APP-093] will also be updated to include the individual trees.

Relevant Representation Number	Representation	Applicant Response
	terminology. Priority Habitats within the OL were identified through a desk study and the area of coastal and floodplain grazing marsh (CFGM) was verified through field survey. As previously mentioned, NSDC believe the Nottinghamshire LWS handbook should be to re-evaluate the LWS confirmed to be present within the OL which includes the Fledborough to Harby Dismantled Railway LWS.	

RR.135	The site is predominantly comprised of arable land, with most arable margins recorded as being sown with a game bird seed mix though context to their size is provided. Arable field margins Priority Habitat is a declining habitat within the UK. Given the presence of rare and scarce arable plants identified through the desk study within the OL NSDC consider there should be an assessment to determine whether any arable margins meet the UK BAP definition6. Paragraph 3.4.1 of TA 6.3 acknowledges the limitation of the recent cutting of the field that supported poor semi-improved grassland. The applicant should clarify if efforts were made to return to this field later in the season to confirm habitat classification and the habitat condition assessment. The baseline habitat assessment has classified the existing ponds within the OL as Priority Habitat. Without further detailed assessment as described with the UKBAP Pond Priority Habitat description7, such as a Predictive System for Multimetrics (PSYM) survey and detailed botanical survey, we request that the applicant provides further justification for why these ponds meet the UKBAP definition, for example through the presence of species of high conservation importance. Paragraph 3.12.5 of TA 6.3 states that there are two main ditch systems located to the East of the River Trent and para 6.10.3 of Chapter 6 confirms that the Sewer Dyke is connected to the River Trent. Whilst it is acknowledged that the Unnamed drainage ditch in the far east of the site is	The Applicant is confident that the habitat survey undertaken provides a good reflection of the habitats present. The proposed development would lead to a large increase in the amount of field margins supporting habitats beneficial to wildlife (see environmental measure C30 within Chapter 6 Biodiversity [APP-035]) which will provide opportunities for arable weeds already present in the seed bank. The Applicant considers it unnecessary to undertake further habitat survey of arable field margins. The Applicant assumed ponds were priority habitat. It would be atypical to gather the information to use the PSYM (i.e. macro-invertebrate survey) for development projects, especially for those that do not result in the loss of habitat. Assuming ponds are priority habitat is simply a precautionary stand point and does not alter the outcome of the assessment. Figures 7.1 and 7.2 have been produced to support Chapter 7 Hydrology and Hydrogeology [APP-036] and the watercourse designations relate to environmental measures placed upon them (such as buffers to built development) as well as the assessment of likely significant effects specifically from a hydrology and hydrogeology perspective. Figures 7.1 and 7.2 were not prepared to inform the habitat assessment, and it is not considered appropriate, therefore, to update the figures to reflect watercourse designations that are not relevant to Chapter 7 [APP-036].

Relevant Representation Number	Representation	Applicant Response
	considered likely to constitute a ditch, we consider that the Sewer Dyke should be mapped as 'Other rivers and streams.' The watercourse is identified on EA catchment data explorer as the 'Trent from Calrton-on-Trent to Laughton Drain Water Body' and falls within the Trent and Tributary Operational Catchment. Whilst it is described as a drain its water body type is classified as 'river' and is shown to be part of the River Trent. Figure 7.1 of Volume 3 in relation to the Hydrology Chapter does shown the Unnamed ditch system as an Unnamed Ordinary Watercourse and so the applicant should also consider whether this watercourse should also be mapped as 'Other Rivers and Streams' habitat due to its hydrological connection to the River Trent and presence of flow from south to north. From a review of Figure 7.2 there appear to be several ditches connected to this feature that have not been included on the Baseline Habitat Map. However, it may be that these have been captured within the 'Hedgerow with ditch' classifications and it is requested that the Figure is updated to clarify this point. In particular there appear to be ditches that run from east to west within fields located immediately east of the River Trent which would have implications for the management of the proposed creation of Coastal Floodplain Grazing Marsh (CFGM).	

RR.135	Habitat Condition Assessments - Habitat Condition Assessments are provided at Appendix A1 of TA 6.10. Areas of modified grassland within field margins, permanent pasture and banks of the River Trent were assessed to be in 'poor' condition due to a failure to pass Criterion A with the justification that the areas 'lack species diversity.' We request that further justification is provided given the absence of any species lists for individual habitats or use of a DAFOR scale or quadrat data. Two ponds within the site were assessed to be in 'good' condition having passed all seven criteria. From a review of the Baseline Habitat plan it is difficult to confirm whether these were completely surrounded by semi-natural habitat (of moderate distinctiveness or above) for at least 10m from the edge of the pond and therefore do pass Criterion B. It appears as though some of the ponds were surrounded by arable land and it is therefore requested that the applicant clarifies this point. TA 6.3 also lacks detail on the emergence, submerged and floating plants that the condition assessment indicates comprise more than 50% of the pond area and states at para 3.12.1 that five ponds are within the OL. It is considered that under the bare ground condition assessment that it is unlikely that the farm tracks will have passed Criterion B. If the applicant can confirm that it they do provide a range of plant species that are of benefit to wildlife it is strongly suggested that they comprise a different broad habitat type and perhaps should be incorporated into	Habitat condition assessments and relevant information will be updated within Appendix 6.3 Extended Habitat Survey [APP-086] and Appendix 6.10 Biodiversity Net Gain Assessment [APP-093] where necessary and updated reports provided at Deadline 1. The Applicant is not proposing to undertake any further field survey of modified grassland. However, to provide reassurance to NSDC a new environmental measure (C36) in Table 6.6 of Chapter 6 Biodiversity [APP-035] is specified to allow for a post-consent survey to allow the Biodiversity Gain Plan to be based both on a detailed design of the infrastructure and habitat creation / enhancement measures and an up to date understanding of habitat condition. The updated Chapter 6 Biodiversity [APP-035] will be provided at Deadline 1. The habitat condition of ponds and woodland will be reviewed and amendments made to Appendix 6.3 Extended Habitat Survey [APP-086] and Appendix 6.10 Biodiversity Net Gain Assessment [APP-093] where applicable. However, it is noted by the Applicant that no ponds or woodland will be subject to loss or damage by the Proposed Development.

Relevant Representation Number	Representation	Applicant Response
	neighbouring habitat polygons such as field margins or modified grassland. Regarding the woodland condition assessments, since none of the total woodland areas exceed 10 hectares, and thus individual woodland blocks are also less than 10 ha, it is considered that all assessments would score 3 points for Criterion F. Where it is stated that there is no temporary open space, this falls within the acceptable amount for woodlands under 10ha. In addition, for poor condition lowland mixed deciduous woodland assessment where only 1 point is scored for condition D, there should be further justification for the number of species recorded. Although these woodlands may be dominated by ash and oak it is likely that other species were also present across the woodland parcel. No habitat parcel reference has been provided for the poor condition Other woodland mixed. All ditch condition assessment pass Criterion F, yet TA 6.3 details dry ditches. Whilst this will not make a material difference to the ditches that were scored to be in 'poor' condition a decision should be made for ditches listed within the moderate ditch condition where both yes and no are listed. If both Criterion E and F were failed some ditches would actually classify as 'poor' condition.	

RR.135	Assessment of likely significant effects on habitats in light of the above comments ditches and watercourses should be treated as separate entities within Table 6.4 of Chapter 6. The inclusion of embedded buffers to hedgerows, trees, woodlands, and watercourse is appreciated. There is inconsistency between documents as to the buffer distance to watercourses, for example the oLEMP states there will be no development within 5m of bank top whereas the Chapter 4 states 10m. It should be clarified whether the 8m buffer as stated within Table 6.6 of Chapter 6 will extend all watercourses, noting that the River Trent will have a minimum 16m buffer. It is suggested that a 10m bank top is incorporated for watercourses such as Sewer Dyke and that a 5m buffer to ditches would be appropriate. Table 6.8 of Chapter 6 includes Deciduous Woodland and Hedgerows as important ecological features that have the potential to be affected but omits mature trees. Where individual mature trees are located outside of constituent habitats such as hedgerows, these should be included within the assessment. Impacts should be assessed on any veteran trees identified through the further survey work. Paragraph 1.1.5 of the oDEMP acknowledges that habitats created on arable land may be returned to their former land use but state that the requirements of the Statutory Biodiversity Net Gain metrics are expected to be met in advance of decommissioning. Whilst this may be the case, NSDC consider that the impacts of	Chapter 6 Biodiversity [APP-035] will be updated to assess ditches and watercourses where necessary. Stand offs to wet ditches and watercourses will be clarified and information provided within an updated Chapter 6 Biodiversity [APP-035] provided at Deadline 1. The Applicant will update Chapter 6 Biodiversity [APP-035] to include an assessment of veteran trees based on the outputs of Appendix 11.6 Arboriculture Report [APP-134]. The Applicant will discuss the potential implications of decommissioning in more detail in an updated Chapter 6 Biodiversity [APP-035]. However, it is considered that a BNG assessment for decommissioning is not necessary or is it likely to be representative or informative given the 60 year life span of the project.

Relevant Representation Number	Representation	Applicant Response
	decommissioning on habitats have not been thoroughly assessed. On balance this might not represent a significant negative impact but should be captured through a revised BNG to be included within the DEMP to help ensure that the scheme will continue to contribute to biodiversity conservation following decommission.	

RR.135	Biodiversity Net Gain It is acknowledged that the BNG assessment will need to be revised in line with detailed landscape proposals and finalised parameters. Our comments are based on the information submitted within TA 6.10 and we welcome the opportunity to review a copy of the Statutory Biodiversity Metric (SBM) in due course. Our concerns are anticipated to be in relation to how the trading rules have been satisfied and details regarding the watercourse impacts and assessment of encroachment levels. We welcome that the BNG mitigation hierarchy has been followed with the avoidance of high and medium distinctiveness habitat types as far as possible and that a precautionary approach is proposed. Whilst the proposal of modified grassland beneath the panels is welcomed, it is considered that a target condition of 'good' is not precautionary enough. In order to achieve 'good' condition modified grassland the sward must support '6-8 vascular plant species per m2 present, including at least 2 forbs'. Although a shade tolerant seed mix is proposed, achieving this target condition for this habitat type can be very challenging due to the shading from the proposed panels and many of the forbs within the indicative species mix outlined within the oLEMP require full sun and nutrient poor soils to thrive. The grassland will be established on previously agricultural land which typically will have been subject to high levels of nutrient input to maximise productivity and therefore likely have sub-optimal nutrient indexes, particularly for phosphorus	The Applicant has provided a Statutory Biodiversity Metric to Newark and Sherwood District Council on 9th May 2025, at their request. The calculation can also be found within Appendix 6.10 Biodiversity Net Gain Assessment [APP-093]. The Applicant notes that regardless of any changes to Appendix 6.10 Biodiversity Net Gain Assessment [APP-093] in previous responses, there is no doubt that the level of BNG that will be provided by the proposed development will be way in excess of a typical uplift of at least 10%. Requirement 8 of the Draft DCO [APP-007] secures that prior to the commencement of the Proposed Development, a biodiversity net gain strategy must be submitted to and approved by the relevant planning authority. The Applicant considers that the assumption of modified grassland in good condition is achievable within the Order Limits. Other solar farms that have Development Consent have had more biodiverse grassland types under solar panels accepted (using similar seed mixes), whilst others using grass seed mixes with no wildflower component has had modified grassland in moderate condition (as suggested by NSDC) considered reasonable. For example: Longfield Solar Farm (EN010118) - beneath solar panels assigned other neutral grassland in poor condition. Established using a wildflower seed mix. Heckington Fen Solar (EN010123) - beneath solar panels assigned either other neutral grassland in moderate condition or modified

and nitrogen. The applicant should confirm whether soil testing has been undertaken or will be to inform the final BNG assessment and LEMP. Although it is outline at this stage, very limited details have been provided both the initial establishment phase and the long-term management of the grassland. Effective establishment requires specific actions such as soil preparation, seeding methods, and initial watering schedules, which are not adequately addressed and there appears to be little scope in the construction program to factor in nutrient stripping prescriptions that are indicated at para. 5.4.53 of the oLEMP. Long-term management is equally important and should include ongoing maintenance activities such as mowing regimes, weed control, and monitoring of plant species diversity. NSDC would support an approach whereby natural management and maintenance techniques are followed, that limits the use of pesticides and encourages habitat regeneration wherever possible. Therefore, it is likely that difficulty will be experienced in achieving the target habitat condition. As the BNG delivery will be secured through DCO requirement and will be monitored it will be controlled where necessary through enforcement. The applicant is advised to be aware of the potential challenges in creating this habitat type with a 'high' target habitat condition.	grassland in moderate condition dependent on height of solar panels (range from 3m to 3.5m). Established using a wildflower seed mix. Mallard Pass Solar Project (EN010127) - beneath solar panels assigned modified grassland in moderate condition. Grass seed mix only. East Yorkshire Solar (EN010143) - beneath solar panels assigned modified grassland in moderate condition. Grass seed mix with clover. West Burton Solar Project (EN010132) - beneath solar panels assigned modified grassland in moderate condition. Long term diversification approach (with elements to be decided) with small amount of wildflower seed in mix only (95/5 ratio of grass to wildflower). Cottam Solar Project (EN010133) - beneath solar panels assigned modified grassland in moderate condition. Long term diversification approach (with elements to be decided) with a small amount of wildflower seed in the mix only (95/5 ratio of grass to wildflower). Based on what has been accepted as reasonable elsewhere, it would be a disincentive for a developer to commit to using wildflower mixes, when the same benefit in terms of BNG could be delivered (e.g. modified grassland in moderate condition) using a simple grass mix.

Relevant Representation Number	Representation	Applicant Response
		The Applicant considers that the habitats specified represent a reasonable and precautionary approach, whilst giving the best opportunity to deliver for biodiversity. The Applicant acknowledges that the Outline Landscape and Ecology Plan (oLEMP) [APP-179] does not contain detailed prescriptions for the creation and management of each area. However, the level of information provided is akin to other similar projects and provides an understanding of the types of techniques that would be employed. Requirement 8 of the Draft DCO [APP-007] secures that prior to the commencement of the Proposed Development, a LEMP must be submitted to and approved by the relevant planning authority. Environmental Measure C17 and C29 within Chapter 6 Biodiversity [APP-035] will be updated at Deadline 1 to note the need to undertake soil testing prior to habitat creation and use this data to inform the Habitat Management and Monitoring Plan that will need to accompany the Biodiversity Gain Plan post consent.

RR.135	The aspirations of the project also include the creation of areas of species-rich grassland within designated ecological mitigation areas and as part of the creation of an area of CFGM. As most of the site is comprised of arable land, as suggested above and within in a meeting on 13/01/25 soil testing will be required to ensure grassland creation equivalent to 'other neutral grassland' in 'moderate' condition or higher is viable within proposed locations. This will be important to inform establishment strategies, and any remediation required if phosphate and nitrogen indexes are sub-optimal. It is noted that grassland creation will also take environmental conditions into account and include a variety of mixes that are shade, drought, and water-logging tolerant mixes. Similarly, targeting 'good' condition hedgerows and lines of trees will also be challenging. Hedgerow will need to ensure no more than two criteria are failed and lines of trees must pass all five criteria. We also recommend that the applicant reconsiders the target condition of propose sustainable urban drainage systems (SuDS). The recommendations outlined in paragraphs 2.9-2.11 of this response should also be applied to Figure 4-1 of TA 6.10. Additionally, we recommend using an OS map as a base to enhance the clarity of the habitat polygons. The proposed habitat plan should clearly mark the locations of the field margins, possibly using target notes. Additionally, a separate plan for habitat retention and enhancement would assist to clearly show which hedgerows and	Environmental Measure C17 and C29 within Chapter 6 Biodiversity [APP-035] will be updated at Deadline 1 to note the need to undertake soil testing prior to habitat creation and use this data to inform the Habitat Management and Monitoring Plan that will need to accompany the Biodiversity Gain Plan post consent. It is noted that various grassland creation projects have used crops such as mustard, whole crop rye and barley (grown without fertiliser) to reduce levels of nitrogen and phosphorous. Environmental measures C17 and C29 have been amended to allow for the use of this method (with skylark plots) to provide an option for nutrient management as necessary. A target condition of 'good' for hedgerows is considered appropriate by the Applicant. This is on the basis that the basis of the condition assessment is on physical characteristics (e.g. height, width, gap at hedge base etc.) and width of undisturbed ground in adjacent ground (which is assured through project design). This can be achieved through management (both proposed and adaptive as necessary). Appendix 6.10 Biodiversity Net Gain Assessment [APP-093] will be reviewed in light of the comments and updated as necessary at Deadline 1.

Relevant Representation Number	Representation	Applicant Response
	ditches are proposed to be retained and/or enhanced. In our previous comments we drew attention to the NSDC adopted document concerning 'strategic significance'8. We welcome the refence to this document within Section 6.2 of Chapter 6, however this is not included within TA 6.10.	

RR.135	BNG statement does detail under section 4.1 as to how strategic significance has been applied and by default is correct, however the statement that none of the 'areas of particular importance for biodiversity' within the Nottinghamshire and Nottingham Local Nature Recovery Strategy mapping overlap with the OL is incorrect. There are several areas for woodland and water habitats that do fall within the OL. Therefore, if the scheme is approved after the LNRS is published, the BNG calculations will need to be amended to apply the relevant strategic significance multipliers based on the LNRS. Section 3.1.2 of TA 6.10 state that there are no designated sites within the proposed DCO OL. However, the Fledborough to Harby Dismantled Railway LWS, despite being a non-statutory designated site, falls within the OL and therefore requires a high strategic significance multiplier. Cereal crops are listed within Table 4-2 but are not included within the key on Figure 4-3. It is suggested that Table 4-2 is updated to differentiate between proposed and retained habitats and that a separate habitat retention plan is provided. No individual trees have been mapped as part of the baseline habitat assessment to inform the BNG assessment. As mentioned earlier, the applicant should provide further clarification as to whether there are any free-standing trees and whether there are any that form a component part of hedgerows that do not meet the UKHab definition of 'hedgerow with trees,'. All relevant trees should be accounted for in the BNG assessment,	Appendix 6.10 Biodiversity Net Gain Assessment [APP-093] will be reviewed in light of the comments and updated as necessary at Deadline 1. It is noted that the detailed design of the proposed development is not available and therefore features such as headwalls that (if even necessary) will be very small in size remain unknown. The precautionary approach taken to crossings has been done in part to account for small unknown features that will only be confirmed during the detailed design phase. The Applicant acknowledges that the Outline Landscape and Ecology Management Plan (oLEMP) [APP-179] does not contain detailed prescriptions for the creation and management of each area. However, the level of information provided is akin to other similar projects and provides an understanding of the types of techniques that would be employed. Requirement 8 of the Draft DCO [APP-007] secures that prior to the commencement of the Proposed Development, a LEMP must be submitted to and approved by the relevant planning authority. With regards management of ditches, it is not possible to provide a detailed habitat management plan at this juncture as it will require discussion and agreement with the relevant internal drainage boards. However, it is noted that the management principles are typical (e.g. increasing diversity of vegetation, increasing the width of bank top vegetation etc.). Full details will be provided in a Habitat Management and Monitoring Plan that would be produced alongside

	providing a comprehensive understanding of the site's baseline biodiversity value. Outside of the BNG assessment work, NSDC would also query whether there is a baseline recording of all trees within the order limits from an Arboricultural impact assessment perspective. As detailed later in this correspondence, NSDC consider that a clear understanding should be formulated of the impact on trees during the construction and operational phase outside of the powers that may be sought in the DCO. As stated earlier in these comments NSDC consider that the Sewer Dyke meets the definition of 'Other rivers and streams' and as such should have been surveyed in line with the Modular River Survey (MoRPh) methodology, with sufficient samples taken to cover 20% of each watercourse within the OL. Without a physical copy of the SBM, it is challenging to determine if any baseline hedgerow types are intended to be enhanced to a different hedgerow type. This should be clarified within the BNG Statement. TA 6.11 is light on details regarding the watercourse that was subject to a MoRPh survey. Further details should be provided within the methodology section, including the number of sub-reaches surveyed. The condition assessment sheet is also missing from Annex 1. We welcome the precautionary approach to watercourse crossings; however it is unclear as to whether any encroachment associated with proposed infrastructure has been factored into the BNG assessment. It is requested that	the detailed calculation of BNG following the completion of the detailed design.

Relevant Representation Number	Representation	Applicant Response
	this is confirmed and if omitted should be included within the finalised BNG assessment. All headwalls and other associated infrastructure should also be captured within the assessment. Once the crossing locations are confirmed these should be clearly marked on the Proposed Habitat Plan. As a wider point, NSDC also seek clarification and further information on anticipated impacts on all water features in respect of surface water run off and what proposals there are for the long-term maintenance and management of such features over the operational lifespan of the proposed development, including the need for any monitoring for riparian mammals, fish surveys and aquatic invertebrates as required. We also accept the precautionary approach taken towards temporary impacts, such as construction compound areas and cable corridors, by assuming all habitat is lost. However, it remains unclear whether the assessment has fully evaluated any earthwork requirements concerning retained hedgerows and trees. Similarly, the applicant should clarify the approach to the temporary reduction in height of hedgerows within visibility splays and whether this would diminish the condition value of any features.	

RR.135	Approximately 0.42ha of non-priority ponds are proposed as part of the proposals which are described as over excavated SuDS features associated with substation sites. Further details regarding marginal shelves and proposed planting should be provided to justify their classification beyond that of a feature designed primarily to manage surface water and how it will provide additional benefits to biodiversity. Ditches have been proposed to be enhanced to 'good' condition. The applicant should provide further justification for how this will be achieved as it is advised that criteria B and F can be challenging to fulfil. Currently there is insufficient detail within the oLEMP in relation to how diches will support >10 emergent/submerged and floating-leaved plants per 20m of ditch length as only the sowing of a speciesrich grass mix is proposed within the riparian zone. It is also unclear how sufficient water levels will be maintained though the summer months, particularly in light of potential climate changes. Paragraph 6.1.5 of the oLEMP state that crushed aggregate will be used on permissive paths where required. The applicant should clarify whether this has been taken into account within the BNG assessment. As a precautionary approach it is suggested that all proposed new and existing footpaths are entered into the metric as a habitat type that scores zero biodiversity units. Section 3.3 of TA 6.10 states that all watercourses not considered to be in 'good' condition would be enhanced. The applicant should clarify whether this applies to both to other rivers and	Appendix 6.10 Biodiversity Net Gain Assessment [APP-093] will be reviewed in light of the comments and updated as necessary at Deadline 1. The ponds within SuDS are included as separate features as they are over and above how attenuation basins would typically be constructed (i.e. they would not typically hold water permanently). With regards management of ditches, it is not possible to provide a detailed habitat management plan at this juncture as it will require discussion and agreement with the relevant internal drainage boards. However, it is noted that the management principles are typical (e.g. increasing diversity of vegetation, increasing the width of bank top vegetation etc.). Full details will be provided in a Habitat Management and Monitoring Plan that would be produced alongside the detailed calculation of BNG following the completion of the detailed design. Requirement 8 of the Draft DCO [APP-007] secures that prior to the commencement of the Proposed Development, a biodiversity net gain strategy must be submitted to and approved by the relevant planning authority. The Applicant considers that the range of habitat creation and enhancement measures offered are in excess of the majority of solar farms of all scales. This is reflected both in the high level of uplift within the BNG assessment and the myriad of localised measures that are designed to provide opportunities for local flora and fauna (e.g. beetle banks, hibernacula, temporary scrapes etc.). These enhancements are picking up particular local conservation priorities such as turtle doves, reptiles etc. The design sees

Relevant Representation Number	Representation	Applicant Response
	streams as well as ditch habitat. Care should be taken to ensure that habitat areas for baseline, proposed and enhanced habitat area and lengths correspond within all documents. Within our previous comments we suggested that often in practice can constrain some innovative habitat creation and enhancement proposals. While the project's voluntary commitment to achieving at least a measurable 10% BNG is appreciated, given the large scale of the project we will also welcome opportunities for innovative biodiversity enhancements as opposed to maximising the percentage gain. Whilst the proposals do this to some extent with the aspiration to restore and create areas of CGFM, at a proposed 113.17% gain in habitat units we consider that further effort could be made to fully consider local nature conservation priorities. For example, there are potential opportunities to link blocks of existing woodland within the OL to those that lie adjacent on the eastern boundary.	woodlands linked much better than currently through measures to create and enhance hedgerows (particularly in width and height), plant scrub and individual trees. There is an inherent tension between creation of more woodland for the project which is associated with (a) ensuring that there is enough open habitat to mitigate skylark and (b) avoiding overshadowing areas of PV. It is also noted that the landscape design is currently indicative as the detailed design has not yet come forward. Opportunities for more tree planting will be considered during the detailed design phase.

RR.135	Assessment of likely significant effects on bats In previous comments and meetings NSDC raised concerns that the majority of the OL were determined to have 'Low' suitability of foraging and commuting bats. We advised that there should be localised areas of 'Moderate' and 'High' suitability that should have been subject to a higher survey effort, whilst still being proportional. No further information was provided regarding the additional surveys proposed in 2024. Although higher quality commuting and foraging habitat are acknowledged within TA 6.4 we consider that the hedgerow network has still been undervalued. However, as the majority of the network is to be retained this view does not affect the overall outcome of the ES chapter. We welcome the additional transect route along the Fledborough to Harby Dismantled Railway LWS and additional static monitoring locations undertaken in 2024. We still maintain the position that the given the presence of Annex II species within the OL that transects that covered the highest value habitats including routes 3 & 4 should have been walked monthly, however the static monitoring surveys were undertaken months and overall we consider the survey effort acceptable and welcome the commitment to further monitoring surveys over the operational period. Whilst Chapter 6 and the oCEMP and ooCEMP do have regard to lighting impacts in relation to bats and other nocturnal fauna, we consider this has not been addressed sufficiently in relation to light sensitive	Temporary lighting will unlikely to be needed frequently during the construction period given typical working hours. Lighting may be required when undertaking works such as the trenchless crossing of the River Trent. This is because drilling cannot be paused once started for each duct (to avoid collapse of the bore). However, at most this would require a small number of nights of work to install the cable ducts with the majority of the works (e.g. drilling compound set up etc. being undertaken during daylight hours). Temporary lighting may also be used at substation locations to allow for construction to continue when days are short (e.g. during winter) when bats are less likely to be active. At this stage of design there is no way to provide details on lighting strategy or exact locations, however, it is apparent that all temporary lighting can be designed and managed appropriately to avoid effects on the fitness of individual bats or the local populations. Environmental measure C11 in Chapter 6 Biodiversity [APP-035] will be updated to reference soft felling of trees at Deadline 1. Chapter 6 Biodiversity [APP-035] will be updated at Deadline 1 to provide additional consideration of decommissioning, although noting that high levels of detail are unknown.

species, in particular barbastelle. This species is particularly important within the Newark and Sherwood District being at the northern extent of its known range in Nottinghamshire and is vulnerable to large scale infrastructure schemes. NSDC recommend that more detail is provided within the CEMP documents to ensure that this species is not negatively impacted. Lux levels should be below 1 along habitats confirmed to be used by this species during the activity surveys such as the woodland edges and along the Fledborough to Harby Dismantled Railway LWS. It is also suggested that further desktop study information is sought from the Nottinghamshire Bat Group to provide more in-depth picture of its distribution across the OL and wider landscape and identify any additional important commuting corridors. Reference C11 in Table 6.6 of Chapter 6 outlines measures for pre-construction surveys to evaluate trees for potential bat roosts, indicating these measures will be secured through the oCEMP. Yet the oCEMP appears to lack these specific details. Whilst the measures outlined are in line with BCT guidelines we would request that consideration is also given to soft-fell methods as best practice. We welcome the provision of bat boxes but the oLEMP is light on details. It is suggested that further detailed information is provided within the finalised LEMP in relation to the type and location of the proposed boxes, and details for fixing them into place, with there locations clearly marked on a plan. The oCEMP should also

Relevant Representation Number	Representation	Applicant Response
	include contingency actions should a bat roost be identified and the provision requirements for compensatory bat boxes to fulfil mitigation. NSDC also recommend that the ES chapter further considers the impact of decommissioning on foraging and commuting bats due to the loss of more suitable habitat that will have established during the operation period and the reversion back to arable land. It is suggested that further mitigation measures are outlined within the Decommissioning and Restoration Plan (DRP).	
RR.135	Assessment of likely significant effects on great crested newts The ES chapter indicates that updated eDNA surveys of ponds, previously inaccessible, are scheduled for 2025. This will involve clearing dense vegetation to facilitate access, which is a positive development. Depending on the survey results, GCN may need to be scoped back into the assessment. To provide more context it is suggested that Table 3.1 of TA 6.6 is updated to include the exact distance of each pond from the OL.	Chapter 6 Biodiversity [APP-035] and Appendix 6.6 Great Crested Newt Baseline [APP-089] will be updated with data gathered in 2025 at Deadline 1. It is noted that samples taken in 2025 have not identified great crested newts.
RR.135	Assessment of likely significant effects on riparian mammals (otter and water vole)	The Applicant notes this response.

Relevant Representation Number	Representation	Applicant Response
	We consider that our concerns previously raised regarding the level of survey effort for water vole and otter have been adequately addressed within the ES chapter.	
RR.135	Assessment of likely significant effects on reptiles	Reptile survey was not proposed within the Scoping Report [APP-080]). Following NSDC response to the scoping report, reptile surveys were undertaken. The targeted nature of these surveys were discussed in a meeting held on the 11 March 2024 with the relevant planning authorities. During the meeting it was acknowledged that reptile populations are unlikely to be at particular risk of solar development (allowing for usual mitigation during construction) and that there were long term opportunities to benefit this species group. As the type or level of mitigation proposed would not likely change regardless of the extent of survey (i.e. sampling all ditches or hedgerow bottoms) the Applicant considers it would be disproportionate to have undertaken a wider survey effort.

Relevant Representation Number	Representation	Applicant Response
	In our previous comments we considered that there should be some assessment via target survey work for reptiles and once this was confirmed requested that rationale and methodology for determining sample size and sample locations was provided. We consider that this has not been adequately addressed within Chapter 6 and TA 6.9 and given the extent of wet ditches across the eastern extent of the OL consider that the survey effort does appear to be low. Within the guidance referenced9,10 it is recommended that 10 refugia per 1ha of suitable habitat are deployed and the applicant should clarify if this was the case and provide further rationale if not. Nevertheless, we agree that through the mitigation outlined there would be no negative impacts to these species. Reference C15 in Table 6.6 of Chapter 6 outlines some precautionary working methods for reptiles but does not reference passive displacement during vegetation clearance. This is included as mitigation measures within the oDEMP and it is requested that this is also included within future CEMPs.	

RR.135	Assessment of likely significant effects on birds It is acknowledged that further winter and breeding bird surveys are ongoing, and we welcome the opportunity to review the results when available. However, the methods section (A6.2) within TA 6.5 does not include any assessment details against the LWS selection criteria for Nottinghamshire. As mentioned above and in our comments at the EIA scoping stage, NSDC consider that the site should be assessed against the selection criteria. Guidance for selecting site boundaries for LWS are provided at section 7.4 of the LWS Handbook Part 111, with specific selection criteria in relation to birds within the LWS Handbook Part 2A12. With the application of these documents, it is considered that the scale of the OL should not be a limiting factor to the assessment. As guidance, NSDC suggest that the field groupings used for each 'transect section' could form the boundary for the assessment. The winter bird survey effort is considered to be unconventional, and we request that rationale is provided for why there were six diurnal surveys were undertaken in 2023 and four nocturnal surveys in 2024. The applicant should also justify why no nocturnal breeding surveys were undertaken as this could have provided a good opportunity to identify owl roosts. Furthermore, four individual woodcock were identified during the nocturnal winter surveys. Whist the OL is considered to be outside of the zone of influence of the possible potential Sherwood Forest Special Protection Area (ppSPA), this	Chapter 6 Biodiversity [APP-035] and Appendix 6.8 Winter Bird Baseline [APP-091] will be updated with data gathered in 2025 at Deadline 1. Data gathered in the winter of 2024/25 has included nocturnal surveys.

Relevant Representation Number	Representation	Applicant Response
	species is of high conservation concern and the ES chapter does not have any regard to this species. The provision of beetle banks as part of the embedded mitigation is welcomed as these linear features can also be beneficial in terms of connectivity around the site in addition to enhanced foraging provision for a range of species. However, it is uncertain whether these features will remain or be lost after decommissioning. If they are lost, this change should be considered in assessing the effects on the local breeding bird population.	

RR.135	oLEMP The outline LEMP (TA 7.1) is considered to be light on detailed information owing to the still evolving design of the proposals. It is requested that the final version will provide more information on proposed species to be planted, alongside establishment and long-term management prescriptions. The plan will need to be more robust to maximise the success rate of the establishment of mitigation planting. Climate change has created challenging conditions for plant establishment, with prolonged dry springs and summers and mild and wet winters. Chapter 6 also confirms that there will be some areas of photovoltaic panels that will be under up to 1.5m of floodwater and there is limited information on potential remedial action. NSDC would like to see a LEMP that clearly details the number of visits, the actions to be taken during those visits, the process for replacing lost plants during the establishment period and detailed ongoing longterm management. As the project progresses to NSDC will be happy to provide further advice on our expectations of the document. Sheep grazing is proposed as an aspiration for long-term management of grassland beneath the solar panels. However, Chapter 4 states at para 4.5.11 that the landowners have not expressed an interest to manage livestock within the areas of solar arrays and do not have sufficient facilities (shelter, water, supplementary feed etc.). Therefore, this type of management is considered unlikely to be a feasible option given the scale of the project and stocking	Following detailed design a Habitat Management and Monitoring Plan would be produced alongside a detailed LEMP. This would provide all the relevant information on habitat creation, management, adaptive management and monitoring. This would be a 'live' document that would be updated with actions taken and would be shared with relevant local planning authorities to demonstrate progress. The level of information provided within the application is proportionate and is to provide an understanding of the types of habitats that are to be provided and general approaches to their establishment and management.

requirements. oLEMP The outline LEMP (TA 7.1) is considered to be light on detailed information owing to the still evolving design of the proposals. It is requested that the final version will provide more information on proposed species to be planted, alongside establishment and long-term management prescriptions. The plan will need to be more robust to maximise the success rate of the establishment of mitigation planting. Climate change has created challenging conditions for plant establishment, with prolonged dry springs and summers and mild and wet winters. Chapter 6 also confirms that there will be some areas of photovoltaic panels that will be under up to 1.5m of floodwater and there is limited information on potential remedial action. NSDC would like to see a LEMP that clearly details the number of visits, the actions to be taken during those visits, the process for replacing lost plants during the establishment period and detailed ongoing longterm management. As the project progresses to NSDC will be happy to provide further advice on our expectations of the document. Sheep grazing is proposed as an aspiration for long-term management of grassland beneath the solar panels. However, Chapter 4 states at para 4.5.11 that the landowners have not expressed an interest to manage livestock within the areas of solar arrays and do not have sufficient facilities (shelter, water, supplementary feed etc.). Therefore, this type of management is considered unlikely to be a feasible option given the scale of the project and stocking

Relevant Representation Number	Representation	Applicant Response
	requirements. It would be beneficial to have a Figure clearly outlining areas of retained habitat that is proposed to be enhanced in addition to newly created habitats. It is not clear as to whether the post construction monitoring would be undertaken by an ecologist. The monitoring programme is prosed to only go to year 40 which is in conflict with TA 6.10 which states that habitats will be managed and monitored over the lifetime of the proposed development which would be 60 years. This should be clarified and where necessary documents updated.	

RR.135	oCEMP If veteran trees are confirmed to be within the OL any future CEMPs will need to provide details how the Root Protection Areas (RPAs) will be protected. There are no details regarding protection fencing for ecological features such as retained woodlands, trees, and hedgerows. It is recommended that once the scheme design is finalised that fencing specifications and other mitigation measures are incorporated into future CEMPs, to include an illustrated plan showing 'Biodiversity Protection Zones.' This should include exclusion fencing for 30m buffers to badger setts, 15m to trees with bat roost potential and 10m to retained and newly created ponds. Whilst the ooCEMP makes reference to the Institute of Lighting Professionals (ILP) Guidance Notes the oCEMP simply states that lighting requirements 'will be designed with input from the bat ecologist.' it is recommended that this document also makes reference to professional guidance and provides additional detail on mitigation measures to ensure no impacts to bats during the construction phase. As mentioned early the oCEMP is inadequate in terms of precautionary working methods for trees with bat roost potential and further survey requirements. Whilst these are adequately addressed within Chapter 6 it is requested that Table 3.4 is updated to include these measures. It is also recommended that details of directional strimming are included for reptiles included in Table 3.4 as a precautionary working method. The mitigation measures for outlined at section	The Applicant will update Chapter 6 Biodiversity [APP-035] to include an assessment of veteran trees based on the outputs of Appendix 11.6 Arboricultural Report [APP-134] at Deadline 1. This assessment will include an environmental measure (in table 6.6 of Chapter 6 Biodiversity [APP-035]) that confirms the implementation of the mitigation as described within Natural England's and Forestry Commissions standing advice – *Ancient woodland, ancient trees and veteran trees: advice for making planning decisions*. Individual measures at particular badger setts, bat roosts etc. Will be determined through pre-construction surveys and implemented through the presence of an Ecological Clerk of Works (see environmental measures C10, C11, C13 in Chapter 6 Biodiversity [APP-035]).

Relevant Representation Number	Representation	Applicant Response
	C15 of Table 6.6 of ES include measures for works to stop and the ECoW to provide advice should GCN be found on site. A pragmatic approach should be taken but NSDC recommend that the CEMP should also include this information, as well as contingency measures if a licence needs to be sought. It is recommended that Table 3.4 is updated with timescales for nesting bird checks that may be required and that these should be carried out no more than 24-48 hours before vegetation removal.	
RR.135	ooCEMP The applicant should clarify whether the Environment Manager will liaise with an ecologist, in particular when vegetation removal or management is required and should consider with an Ecological Clerk of Works (ECoW) would be required for this phase of the development.	Environmental measure C15 (Chapter 6 Biodiversity [APP-035]) specifically mentions the need for an ECoW. However, C15 will be updated at Deadline 1 to make it explicit that an ECoW will be responsible for compliance with relevant wildlife legislation at all stages of construction and for implementing the measures to reduce or avoid effects on flora and fauna outlined in the application documents.

Relevant Representation Number	Representation	Applicant Response
RR.135	Conclusion - The design is evolving with some ecology survey work ongoing, though it is not anticipated that updated results will amend the assessment of impacts to these ecological receptors. Broadly speaking the survey effort and assessment of protected species is acceptable, however our main concerns are in relation to the habitat baseline assessment and proposed habitat creation and target conditions within the BNG assessment, and we have provided feedback accordingly. NSDC trust that the applicant will collaborate with relevant stakeholders and interested parties to improve the DCO package in this regard.	The Applicant will update Chapter 6 Biodiversity [APP-035] and relevant appendices to address issues raised by NSDC. The Applicant is keen to work with NSDC to resolve concerns. The Applicant notes that the NSDC does not believe the conclusions reached in Chapter 6 Biodiversity [APP-035], are unrepresentative.
RR.135	oDEMP It is suggested that Table 3.4 is updated to include details of exclusion fencing for 30m buffers to badger setts, 15m to trees with bat roost potential and 10m to retained and newly created ponds.	The Applicant will update the oDEMP [APP-178] in line with the buffers for the confirmed badger sets and retained/newly created ponds. Where surveys confirm bat roosts, the 15m buffer will be applied.

RR.154	Surveys NCC is concerned that within the limitation section of Chapter 6: Biodiversity Paragraph 6.3.4 states: Overall, Extended Habitat Surveys covered 1,304 ha of the 1,409 ha within the Order limits. The 105 ha not subject to survey was focused on the High Marnham substation and surrounding areas where access was restricted. This area is associated with transmission cabling only to connect to the National Grid's High Marnham Substation in its present form or an extended version should National Grid receive Development Consent for its North Humber to High Marnham project. This is again reflected in Section 6.6.15 which states: The Order limits covers approximately 1,409 ha of which 92.5 percent (1,304 ha) has been subject to detailed habitat survey. The area not surveyed is around High Marnham Substation where no access was granted (the area for part of the cable connection only). This is a very large area which has not been subject to detailed surveys, further clarification to whether these areas are subject to protected species surveys should be sought. Specifically, why the area around the High Marnham Substation has not been surveyed, when access issues were the constraint. Surely this area will need accessing for the proposals and therefore access should not be an issue to areas within the Order Limits.	National Grid is planning to construct a new substation close to the existing High Marnham substation as part of the North Humber to High Marnham project (case reference EN020034), which is itself part of the Great Grid Upgrade. The latest proposals see the proposed substation lying within the large arable field immediately to the west of the substation (see Brinsworth to High Marnham – Project Summary Document: High Marnham substation (April 2024) (available at https://rebuild.nationalgrid.com/document/354921/download). This means that the habitat that may be affected is a single arable field and potentially its boundary features. As described in paragraph 6.9.2 of Chapter 6 Biodiversity [APP-035] the local wildlife site and any other habitats of interest (e.g. hedgerows) would be crossed by trenchless techniques. Therefore, the only potential effects associated with a connection at this point is associated with the loss of arable land. This is not considered a particular constraint from the biodiversity perspective. It is suggested that the use of trenchless techniques may still require loss of hedgerow, scrub etc. However, this would not be the case as access either side of the LWS would (i.e. launch and retrieval pits) would be taken to the south of the LWS using National Grid's existing access road and to the north of the LWS using the existing field entrance (which has been subject to survey). It is noted that although the area has been assigned habitats based on satellite imagery and what can be seen from the public highway,

Relevant Representation Number	Representation	Applicant Response
	Within this area there is Marnham Railway Yard LWS, Fledborough to Harby Dismantled Railway LWS and Old Trent, Marnham LWS which support protected species. The transmission cabling will impact habitats such as hedgerows and therefore these need to be accounted for. In addition, the National Grid project will not have taken account for the loss or impact of these habitats. Again, this has been referenced in paragraph 6.9.2 which states: Within the area of 'land for potential cable route' shown on the Illustrative Landscape Masterplan around the High Marnham substation no habitat losses have been accounted for. This is on the basis that any habitats of interest such as hedgerows or scrub would be crossed using trenchless techniques and uncertainty about where the cable connection point would be. Access into the habitats will still be required even using trenchless techniques, which may require the loss of sections of hedgerows ect.	it has been included within the calculations presented in Appendix 6.10 Biodiversity Net Gain Assessment [APP-093]. The Applicant will seek to confirm and agree that this position is reasonable with Nottinghamshire County Council.

Relevant Representation Number	Representation	Applicant Response
RR.154	Local Wildlife Sites Paragraph 6.6.5 states: There are 34 LWS within the 2 km study area, one of which occurs within the Site itself, with a further eight immediately adjacent to the Site. Details of those sites that occur either within or adjacent to the Site are summarised in Table 6.3. This is considered incorrect as Marnham Railway Yard LWS, Fledborough to Harby Dismantled Railway LWS and Road Wood LWS all fall into the Order Limits Boundary. 6.10.22 states Habitats within the LWSs will not be directly impacted by construction activities (C1) and will be protected from indirect impacts through the implementation of buffers (minimum of 5 m). This is not considered to be a sufficient buffer, especially during construction with potential impacts from dust and spillages.	Chapter 6 Biodiversity [APP-035] and Appendix 6.2 Ecology Desk Study [APP-085] will be updated with regards naming of Local Wildlife Sites at Deadline 1. Currently all areas within fields proposed for solar PV deployment adjacent to LWS are arable fields. They are separated from the adjacent LWS by hedgerows or scrub. The construction of solar PV tables within these arable fields would not be expected to create more dust than that associated with farming and nor would it be expected that pollutant escapes would occur. Best practice precautions would be included within a Construction Environmental Management Plan (see environmental measure C14 in Chapter 6 Biodiversity [APP-035]). It is also noted that environmental measure C3 will be updated at Deadline 1 to specify that the minimum stand-off distance of works to LWS has been increased from 5m to 10m (noting in one location an internal access track would be within 10m to avoid tree loss – however this follows an existing farm access). We would seek to reach an agreement with Nottinghamshire County Council on this matter.

RR.154	Ornithology It is indicated that the Breeding Bird Baseline (Vol 6.0: Environmental Statement, Vol 3: Technical Appendices Supporting ES Vol 2, Appendix 6.5 Breeding Bird Baseline) adopted a sampling approach covering 633 ha of the 1478 ha site. It further appears that some areas surveyed are no longer in Order Limits area, and the Biodiversity Chapter (Vol 6.0: Environmental Statement, Vol 2: Aspect Chapters, Chapter 6: Biodiversity) in para 6.3.8 states that the area surveyed is in fact 27% of the Order Limits area, i.e. around only a quarter of the site. The rationale for taking a sampling approach is not clearly justified, and the effect of the sampling approach is that some very large parts of the Order Limits area have not been subject to survey which is very concerning. It is stated in para 6.3.9 that the field survey programme was discussed with stakeholders, and methods agreed as appropriate. With regards to birds, this is not the case, as concerns about the sampling approach were raised, for example in a meeting with the applicant on 11 March 2024 (as minuted). It is indicated that some further surveys will be undertaken in 2025, but no further information is given about the scope of these surveys or how the results will be taken into account as part of the DCO process. It is not clear why omitted areas were not surveyed in 2024.	Chapter 6 Biodiversity [APP-035] and Appendix 6.5 Breeding bird baseline [APP-088] will be updated with results from 2025 at Deadline 1. With regards skylark, the mitigation proposed is considered appropriate to provide breeding opportunities to all pairs that may be displaced from the solar array areas. Clarification will be provided in the update to Chapter 6 Biodiversity [APP-035] at Deadline 1 in light of the latest breeding bird data.

Surveys were undertaken later in the survey season that would normally be expected, not commencing until May (normally starting in mid March or early April).

A number of notable bird species were recorded during surveys, including Barn Owl, Hobby, Quali, Grey Partridge, Linnet, Skylark, Turtle Dove, Yellowhammer and Yellow Wagtail. The sampling approach has risked under-reporting the importance of the Limit Order area for rare/scarce species which may only occur patchily across the area, or which have been completely missed so far (such as Tree Sparrow or Corn Bunting).

Impacts on ground nesting birds, particularly Skylarks, seem to be of greatest concern, but it does not appear that an attempt has been made to estimate how many Skylark territories there will be post-development, with mitigation. Furthermore, with regards to para 6.10.92 of the Biodiversity Chapter, further detail is needed of the extrapolation of Skylark territories has been carried out, given only a quarter of the site was actually surveyed and the extrapolation form 66 pairs to 115 pairs suggests that half the Limit Order are is unsuitable for Skylarks, which seems unlikely.

In summary, the approach to breeding birds represents a significant area of concern which will need to be closely scrutinised as part of the LIR.

Relevant Representation Number	Representation	Applicant Response
	The Wintering Bird Survey (erroneously titled Vol 6.0: Environmental Statement, Vol 3: Technical Appendices Supporting ES Vol 2, Appendix 6.8 Breeding Bird Baseline [sic]) has also taken a sampling approach, but the reliance of wintering birds on seasonal cropping patterns along with retention of habitat along the River Trent means that fewer concerns are raised in this respect, and no particular issues are identified at this stage. Again, the Wintering Bird Survey will be more closely scrutinised as part of the LIR.	

RR.154	Reptiles There are major concerns relating to the approach used for the reptile surveys as well as the mitigation proposed. Extracts from the relevant documents and comments are provided below: Paragraph 6.6.52 (ES Chapter 6: Biodiversity EN01059/APP/6.6) states: A sampling approach was used to assess the highest quality habitats within five locations across the Order limits. Grass snake (peak count of 2 adults) and common lizard (peak count of 3 adults) were confirmed to occur within these habitats. However, no reptiles were identified along the Fledborough to Harby Dismantled Railway LWS. Considering that reptiles were identified to be present within these areas, and therefore present within the order limits, it is unclear why no further surveys undertaken in wider areas. Paragraph 10.131 states: Potential for reptiles to be killed or injured during vegetation clearance is the largest risk to individuals. To avoid this monitoring of vegetation clearance by an Ecological Clerk of Works (C15) would be undertaken. Any reptiles located would be moved to suitable habitat in the near vicinity where they could continue to exist during the construction phase.	Reptile survey was not proposed within the Scoping Report [APP-080]). Following NSDC response to the scoping report, reptile surveys were undertaken. The targeted nature of these surveys was discussed in a meeting held on the 11 March 2024 with the relevant planning authorities. During the meeting it was acknowledged that reptile populations are unlikely to be at particular risk of solar development (allowing for usual mitigation during construction) and that there were long term opportunities to benefit this species group. The surveys identified both grass snake and common lizard presence, thereby confirming the need for typical management during vegetation clearance (see Environmental measure C15 in Chapter 6 Biodiversity [APP-035]). Environmental measures (such as C18, C19, C20 and C21) all include habitat features that will be beneficial to these species. Although there were limitations to the survey (mainly due to survey equipment being removed and/or moved by members of the public), neither the outcome of the assessment nor the approach to mitigation or enhancement would change. As the type or level of mitigation proposed would not likely change regardless of the extent of survey (i.e. sampling all ditches or hedgerow bottoms) the Applicant considers it would be disproportionate to have undertaken a wider survey effort.

This is not sufficient mitigation considering the limitations to the survey effort, sampling approach used to undertake the surveys as the distribution of reptiles across the site is not currently known, only across a very small proportion of the site. More mitigation, such as a precautionary method of working should be used i.e. cuts of vegetation to 30cm in a directional manner etc. This is further detailed in our comments in the environmental measures table under ref. C15 (see below).

Paragraph A.6.1.5 of the Reptile Appendix 6.9 (EN010159/APP/6.21) states: Following the completion of the surveys, evolution of the Order Limits has removed some of the sampled area from the project. Clarification is sought with regards to what this area was and what the results of this area were. This area could further indicate reptiles present or likely absence within the order limits.

Refugia deployed on 30th May 2024 and the first survey was on the 11th of June which is under 2 weeks. 3rd survey on the 25th of June was undertaken in too high temperatures – 17-23 degrees Surveys 4.1, 4.2, 5 and 6 were all undertaken in July which is outside of the optimal window.

The sampling method used only used 5 locations across

the whole site – 4 of the locations were over the eastern side of the river Trent with only one location in the western side of the river Trent. A very large area of the site has not been surveyed. It is accepted that the majority of the Site is arable field, however there are still hedgerows, blocks of woodland and grassland (grazed) in the areas which were not surveyed which offer suitability for reptiles.

The limitations section describes that: A.6.3.1. During the survey period, some limitations were encountered that could potentially influence survey results. A total of approximately 86 felts were found to be missing, damaged, or destroyed due to various activities, including agricultural operations and interference from local land users. Specifically:

Ten felts were removed from Location C prior to Visit 2. Six felts were missing across the survey area at Visit 3. 18 felts were damaged at Location B, and four felts were damaged at Location E prior to Visit 4. 39 felts were destroyed, and nine felts were missing from all survey locations prior to Visit 9. A.6.3.2. Felts lost or damaged before Visit 4 were replaced during the following visits and left to bed in for a sufficient period before subsequent surveys. In addition, visual searches within a radius of 3 to 4 meters around the felts were conducted to supplement the survey effort.

	No information has been provided about when the felts were replaced other than during the following visits and considering that surveys were all undertaken within less than 2 weeks of each other, then it is considered that the replacement of the felts and the time allowed to let the new replacement felts bed in, is not sufficient or in line with best practice guidelines. Also, as 18 felts of the 20 felts were damaged at location B, there was not sufficient felts to undertake a thorough survey in line with best practice guidelines. This location only identified one common lizard at this location, it's not considered a sufficient estimate of the numbers of reptiles at this location. Location E had a total of 14 records over the surveys with a max count of 3 individuals – considering that only 20 felts were used in this area, then its not considered a sufficient estimate of the population present. Considering that reptiles are of county importance, then any significant populations of reptiles needs to be determined and protected. Considering that reptiles have been identified at location B, D and E, there doesn't appear to be any enhancements specifically for reptiles within these locations.	
RR.154	Bats	The bat activity survey was undertaken to understand the type of species present and the general levels of activity. As is typical

These comments are specifically in relation to Appendix 6.4: Bat Baseline (EN010159/APP/6.21).

Survey effort – some clarification is required for why only 4 transects were selected, other than the suitability of habitats in these locations. Justification is sought for why transects to provide a baseline of the sites use by bats was not used. Focusing on just the higher quality habitats and not overall may miss any other important commuting or foraging areas across the Site. The heat map in appendix 6.4 Figure 3.4 clearly shows areas which are missing from the survey effort.

This method is not consistent with current guidelines (Collins, 2023), with specific reference to the following paragraph: 8.2.8 all habitats should be sampled during the bat activity surveys. If the impact occurs in an area perceived as having low suitability for bats, then this may still need to be surveyed to evidence this or detect unforeseen importance.

It's also unclear whether the guidance as provided in paragraphs 8.2.16 and 8.2.25 of the bat survey guidelines has been followed for the bat activity surveys.

It is unclear why static 10 was positioned outside of the order limits. More clarification to why only of the locations 2 (locations 11 and 12) incorporated arable features such as hedgerows, woodland edges, watercourses etc were the focus of the transects as this is where the majority of bat activity is expected. It is unnecessary and disproportionate to walk every hedgerow or other habitat to gain an understanding of bat activity (this is in line with Bat Conservation Trust guidelines (Collins (ed.) 2023). The guidance notes that all habitat types should be sampled (not fully covered).

Further, it is notable that the design of the project has accounted for bats and the types of habitat they use most frequently on the Site. Following construction there will be better habitat present for bats including an additional 13km of hedgerow, scrub, scattered trees and woodland belts. There will also be grassland and a ditch system capable of providing considerable amounts of invertebrate prey.

The Proposed Development has been designed sympathetically to minimise the amount of hedgerow and trees that will require to be removed. In total 340m of hedgerow has been considered to be lost due to works to provide access. It is expected that hedgerow and other trees would be avoided in detailed design, although it is not possible to confirm at this stage (for example a visibility splay may require tree removal to maintain road safety). The Applicant cannot currently commit to retaining all trees given the level of design, however any removals would be described and accounted for during the detailed design phase. Overall the delivery of the LEMP (secured through Requirement 8) and the Biodiversity Net Gain Strategy (secured through Requirement 9) will provide much better opportunities for bats.

fields, when this forms the majority of the on-site habitats. Justification for how the static monitoring locations were selected needs to be sought. The 12 points used appear to be random and not a full representation of all the habitats at the Site and to be directly impacted. Its unclear how the edge of cereal crop and the cereal crop locations (Figure 3.5) have been factored into the assessment when the locations provided in Table 2.2 both detail the static detector located within the centre of an arable field with one field containing non cereal crop and the other containing cereal crop. Information for how the solar farm will be monitored needs to be sought. Set locations of the baseline and then post development should be used as a comparison. Bat survey guidelines – it appears that the older bat survey guidelines from 2016 have been used, as cited within the reference. The newer 2023 guideline were available from 2023 and should have been used for both the bat roost and activity surveys. Its not clear how the trees have been categorised in terms of their suitability to support roosting bats. The ES Chapter makes reference to the 2023 good practice guidelines, but this doesn't correspond with the technical	The Applicant is content that the bat data provided is adequate to understand the types of bats present within the Order Limits and their general level of activity both in habitats where you would typically expect to record higher levels of activity (e.g. woodland edge) and low levels of activity (within arable fields). Further data collection would not alter the approach to design, mitigation or enhancement as the retention and buffering of habitats of most interest to bats have largely been retained. The enhancements proposed will be beneficial for bats by providing more connection and structure in the landscape and by providing better feeding opportunities.

Relevant Representation Number	Representation	Applicant Response
	appendix (6.4: Bat Baseline). In addition, the following comments in relation to the ES Chapter: Paragraph 6.10.86 states: Buffers around retained high-quality habitat will be implemented (C4) and preconstruction surveys will confirm the presence of existing roost features and identify new ones within, or adjacent to, the Order limits (C11). Further survey may be required to confirm the presence or likely absence of a roost in the vicinity of construction works and, if necessary, a licence will be obtained from Natural England. In addition, supervision of vegetation clearance will include the assessment of trees for bat roosting potential, specifically where access restrictions have prevented assessment during baseline and pre-construction survey (C15). All trees should be retained and avoided. It seems unnecessary that trees should need to be removed considering the vast area of the Site and options to avoid these features.	

Relevant Representation Number	Representation	Applicant Response
RR.154	Badger The preference is for suitability sized holes rather than gates to be used to facilitate movement of this species around the order limits.	Noted – environmental measure C9 in Chapter 6 Biodiversity [APP-035] allows for either. C9 will be updated to remove references to gates at Deadline 1.

Relevant Representation Number	Representation	Applicant Response
RR.154	Otter ES chapter Paragraph 6.10.116 states: The permanently wet ditches where effects would be manifest will be impacted by construction activities (C1) but will be protected through the implementation of One Earth Solar Farm Environmental Statement Volume 2: Chapter 6: Biodiversity Application Document Ref: EN010159/6.6 Planning Inspectorate Scheme Ref: EN010159 Page 87 buffers, and good housekeeping as detailed within the CEMP (C4 and C14) to control dust, prevent pollution and reduce the risk of spreading invasive nonnative species. At the point of decommissioning the likely significant effects will be similar to construction, although will be less intrusive as cables, piles and other below ground infrastructure is proposed to remain in place. No information on the size of buffers, location of artificial holts to be impacted during decommissioning has been provided or assessed	Currently, there are no proposed locations for artificial otter holts. This is because the location of these would be considered in discussions with the local internal drainage board. The details of location and design would be provided at the detailed design stage within the LEMP (secured via Requirement 8).

Relevant Representation Number	Representation	Applicant Response
RR.154	Water Vole More details are quired on the control of mink, including length of time and location.	Currently there is no agreement with a relevant organisation to undertake mink control. However, it is known that there are organisations in the general area that will be undertaking mink control programmes. Where traps may be placed is unknown and the Applicant would rely upon the expert opinion of those undertaking the control programme. Environmental measure C23 will be updated to note that the intention would be to provide funding for at least a 10 year period. It is noted that the exact length of time would be dependent on the local projects undertaking the control programme and its level of success. This will be included in the updated Chapter 6 Biodiversity [APP-035] provided at Deadline 1.
RR.154	River Trent ES chapter Paragraph 6.10.53 states: Habitats within the River Trent will not be directly impacted by construction activities (C1) and will be protected from indirect impacts through the implementation of buffers (minimum 16 m) This buffer is not considered sufficient considering the species the River Trent supports.	The Applicant is seeking discussions with NCC to understand this opinion. It is the Applicant's view that the depth of the HDD beneath bed level (minimum 5m) is the main mitigation for species within the River Trent.

RR.154	Lampreys Paragraph 6.10.8 of the ES Chapter states: Changes in EMF and heat are unlikely to be detectable within a few metres (likely under 1.5 m) from each cable. At the minimum specified depths no effects would be expected. To inform future consideration of lamprey and EMF, monitoring will be implemented (C12) in coordination with the Environment Agency and Natural England (as has been requested of other solar developers in the general locale). The requirement for monitoring suggests that the exact impacts to lamprey cannot be determined. Although the ES chapter has reviewed the literature and provided justification and mitigation to be used, the use of the word likely does not provide complete confidence that there will be no impacts to this species. Lamprey populations will be monitored for no more than 5 years – we would question whether this is sufficient considering their life cycle. Larvae live downstream for 3-7 years and then go to the ocean, before returning to freshwater to spawn and die. 5 years wouldn't be sufficient to monitor any impacts to the population. Especially with the impacts of the cabling under the Trent. There has been no baseline survey to establish the number of lampreys and therefore cannot determine impacts through any monitoring.	The Applicant has mirrored the mitigation considered appropriate by Natural England and the Environment Agency for other nearby energy projects with connections across the River Trent (e.g. West Burton Solar Project, Gate Burton Energy Park). There would be no effect on lampreys of decommissioning as the ducts underneath the river would be left in-situ. If cables were removed for recycling they would be pulled in from the joint bays either side of it.

Relevant Representation Number	Representation	Applicant Response
	Impacts to lamprey during the decommissioning phases have not been considered.	

RR.154	Environmental Measures Table 6.6 Environmental Measures and Securing Mechanisms P.40-55 Ref: C13. Measure: Construction areas will be fenced using either hoarding or Heras fencing to prevent animals from entering active works, thereby protecting them from accidental injury or killing Comment: This type of fencing would not stop animals from entering active works. Other methods of mitigation need to be considered. Ref: C15. Measure: Vegetation clearance will be timed to avoid the main bird nesting season (March to August inclusive), and periods where reptiles and amphibians are active (climate dependent) to avoid injury or killing. Where this is not possible, habitats will be inspected prior to works by an Ecological Clerk of Works (ECoW) to search for potential bird nests and features suitable to support sheltering herptiles. If found, nests will be monitored to confirm occupation (nest building, egg incubation or with young) to determine the requirement for a suitable stand-off distance to be implemented. Comment: Not considered sufficient – would also disturb ground nesting birds too much. Mitigation to prevent nesting birds should be undertaken - i.e. cutting of any longer grassland habitats or other vegetation outside of the nesting bird season and then management of any	Environmental measures C13, C15, C16, C19, C20, C24 in Chapter 6 Biodiversity [APP-035] will be updated at Deadline 1. Detailed management of grassland being primarily established for skylark will be provided in the LEMP. Appropriate measures (such as timing of management measures) will be detailed and subject to local planning authority approval via Requirement 8 of the draft DCO. The Applicant notes the request for use of imported sand to create some beetle banks. This request would be considered during detailed design, noting that dependent on scale this could have implications with regard over aspects such as number of HGV movements. Assumptions have been made regarding hedgerow loss as the exact placement of access points is not confirmed. The design focuses on existing gateways and hedgerow gaps, but extent of enlargement needed to accommodate the 6m access tracks have not been measured. Therefore, a precautionary loss (assuming 6m loss at each access point through a hedgerow) has been assumed. Fencing of the solar panels has been specified to minimise habitat loss, whilst also creating coherent areas for management and operation.

grassland swards to a low height to deter nesting (grassland habitats). Areas of habitats such as scrub, hedgerows etc should be cut in the reptile active period, immediately following suitable nesting bird surveys by experienced Ecologists.

Ref: C16. Measure: Advanced habitat creation and enhancement works. Comment: are these areas going to be protected once these works have been completed – they need to be fenced or have a specific phasing to prevent any encroachment during construction and decommissioning.

Ref: C17 Measure: Skylark plots Comment: To be created 12 months prior to the installation of the modules. What protection are these going to have ? Management works to the grassland during the establishment period will need to be undertaken which could impact any skylark nests

Ref: C18 Measure: Beetle banks Comment: Consideration of different types to be created currently all will just be sown with a species rich grassland. Could some be made with sandy substrate and have an acid grassland mix created?

Ref: C19 / C20 Measure: Habitat piles and gabion baskets. Comment: Clarification sought for the numbers to be used and locations. 50 and 25 doesn't seem to be

Relevant Representation Number	Representation	Applicant Response
	enough Ref: C24 Measure: Bird boxes Comment: 50 including 3 barn owl boxes doesn't seem to be enough Table 6.7 Environmental Parameters The table on page 55 outlines the habitat types, loss and quantification. Considering that at this stage the design, access points, habitat creation and losses are detailed and known it is unclear why 'assumptions' have been made specifically for hedgerow and arable field margins. Paragraph 6.10.35 also states: Fencing will surround the solar tables but will likely be installed in large sections that cover several fields at one time meaning that it will cross through hedgerows on occasion. The removal of a section of a hedgerow to facilitate a fence seems unnecessary habitat loss and impacts. The hedgerows themselves would act as fencing.	

RR.154	Biodiversity Net Gain (BNG) Please note that we have not had sight of the excel spreadsheet statutory metric with information in this section pulled from ES Volume 3, Appendix 6.10: Biodiversity Net Gain Assessment [EN010159/APP/6.21]. For further comments, NCC would need a copy of the excel spreadsheet. Modified grassland in good condition – habitat summary states: Grassland field with high species diversity though evidence of agricultural heritage. Clarification is sought with regards to the number of species per square metre and if this should be other neutral grassland? Missing information to define this (see below) – habitat type in UK Habs is not solely based on agricultural use but through the composition. BNG condition assessment sheets also require the use of Condition sheet 6 and not 5 if there are more than 9 species per m2. The modified grassland in good condition underneath the solar panels is not feasible. Under the solar panels will require regular management to keep the sward height low and therefore will not be able to meet condition criteria B and D – therefore the maximum is moderate condition for this habitat.	The Statutory Biodiversity Metric has now been supplied to relevant stakeholders. Following updates to Appendix 6.10 Biodiversity Net Gain Assessment [APP-093] a new version will be provided for upload at Deadline 1 The changes made to Chapter 6 Biodiversity [APP-035] and Appendix 6.10 Biodiversity Net Gain Assessment [APP-093] will seek to provide the clarity requested where necessary. See responses to Internal code 26, 28 and 30 that cover comments on habitat surveys and grassland beneath solar panels. The Applicant does not agree with listing all habitats under solar panels as U1b6 (developed land; sealed surface, other developed land) as it does not reflect the reality or common practice with other BNG assessments of solar farms. For example, the following consented NSIPs all assume grass growth underneath panels: Longfield Solar Farm (EN010118) West Burton Solar Project (EN010132) Cottam Solar Project (EN010133) Mallard Pass (EN010127) East Yorkshire Solar Farm (EN010143) Heckington Fen Solar Park (EN010123) Oaklands farm Solar Park (EN010122)

It should be noted that UK Hab Guidance for Solar Arrays page 326 states: Record the strips of panels as u1b6 and the strips of vegetation in between the rows separately.

New tree planting cannot achieve good condition in 30 years. This needs to be at least moderate – trees are unlikely to pass condition criteria C and E as they will not reach an age to be classed as mature or develop niches within the 30 years.

No information on the size of the trees inputted into the metric has been provided. As per BNG User Guidance on post-development tree planting, newly planted individual trees should be classed as 'small', unless 'medium' size or above at the time of site-planting and trees planted with a DBH less than 7.5cm are considered to be 'small.

No species lists / results of the quadrats undertaken for the grassland conditions, provided within the BNG assessment or condition sheets provided as an appendix A1 Habitat Condition Assessment Sheets. Many of the condition assessment sheets are also lacking in justification for the pass or fail of each condition criteria.

In addition, Appendix 6-3 extended habitat survey does not contain a direct translation into UK Habs, with

Relevant Representation Number	Representation	Applicant Response
	references to older Phase 1 habitat types (JNCC 2016), and not UKHabs, therefore finding species lists for the relevant habitat type for comparison is difficult. Although over a 10% net gain is definitely feasible for this solar farm, modifications to the post development habitat types needs to be undertaken to provide a more realistic percentage of net gain.	
RR.154	Outline Landscape and Ecology Management Plan (OLEMP) NCC will provide detailed comments on the OLEMP once details have been finalised, as we are aware that landscaping details have not been finalised at this stage. We would also like to see some of our suggestions above incorporated into the OLEMP.	The Applicant notes this comment. Requirement 8 of the Draft DCO [APP-007] secures that prior to the commencement of the Proposed Development, a LEMP must be submitted to and approved by the relevant planning authority in consultation with the relevant county authority.

RR.077	Biodiversity General comments APP-035 (6.6 Chapter 6: Biodiversity) sets out the biodiversity and ecological elements of the Applicant's ES. A broad suite of ecological surveys and investigations have been undertaken by the Applicant. The results of these surveys have been used to inform the ES for the project and to be used in the development of any necessary mitigation measures. Surveys undertaken include: • Habitat and botanical surveys including both terrestrial and aquatic habitats. • Detailed surveys for protected and notable species, including terrestrial invertebrates, great crested newts, reptiles and amphibians, breeding and wintering birds, bats, and riparian mammals. APP-035 identifies a range of potential ecological effects during the construction of the proposal. These include permanent loss or change of habitats, temporary loss or damage to habitats, impacts on protected and priority species and spread of invasive non-native species (INNS). During operations and maintenance, the main potential effect is likely to be disturbance of protected and priority species. Decommissioning impacts are likely to be similar to construction impacts but at a more limited geographical extent and timescale. The Project is reliant on a package of avoidance, mitigation and enhancement measures to address the ecological impacts. To this end, the Applicant has prepared an outline Construction Environmental Management Plan (oCEMP), an outline Landcape and Ecological Management Plan (oLEMP), an outline Operational	The Applicant notes this comment.

Relevant Representation Number	Representation	Applicant Response
	Environmental Management Plan (oOEMP) and an outline Decommissioning Environmental Management Plan (oDEMP). Measures proposed in the oCEMP, oLEMP, oOEMP and oDEMP will need to be secured in the DCO. A Commitments Register (APP-187) has been prepared which provides a helpful summary of the mitigation identified for the Project including embedded mitigation measures, which have been designed into the project.	

RR.077	Impacts on statutory and non-statutory designated sites The Applicant has undertaken desk studies and a search of information held by Lincolnshire Environmental Records Centre to identify important ecological sites in the vicinity of the proposal. There are no internationally important sites designated for biodiversity within 10km of the proposal, however, given the potential for impacts on river and sea lamprey which are components of the Humber Estuary SAC and Ramsar site, a Shadow Habitats Regulation Assessment (HRA) report has been submitted (APP-165) and concludes that there will be no adverse effects the integrity of the Humber Estuary SAC and Ramsar site. The Planning Inspectorate will need to satisfy itself that sufficient information has been submitted by the Applicant to enable this conclusion to be reached. There is one nationally important site designated for biodiversity just over 2km from the Order limits within Nottinghamshire. There are 34 non-statutory sites designated for biodiversity importance either within or within 2km of the Order limits. Only one of these lies within the Order limits and all of the non-statutory sites are within Nottinghamshire. The locations of these non-statutory sites are set out in Figure A-1 of APP-085. Where necessary avoidance, compensation and mitigation measures are proposed.	The Applicant notes this comment.
RR.077	Cumulative Effects There are a number of development proposals of varying scales in the vicinity of this	The Applicant notes this comment.

Relevant Representation Number	Representation	Applicant Response
	proposal. These range from small scale housing developments to NSIP scale energy developments. Details of the approach to cumulative effects and a list of projects considered are included in Chapter 18 (APP-047). The assessment does not identify any significant adverse effects on ecology arising from cumulative impacts.	

Relevant Representation Number	Representation	Applicant Response
RR.077	Biodiversity Net Gain Given the scale and nature of the proposed development the Council will expect the project to deliver significantly more than 10% Biodiversity Net Gain (BNG). The Applicant has set out their approach to BNG in 6.21 Appendix 6.10 Biodiversity Net Gain Assessment (APP-093). This document states at 1.1.4 that the One Earth Solar Farm project is "… committed to providing substantial biodiversity enhancements…". Based on an indicative landscape masterplan, the Scheme is calculated to result in a net gain of 113.17% for area-based habitat units, 92.49% for hedgerow units and 57.75% for watercourse units. This calculation will need to be updated when the final design of the site is confirmed. The Council welcomes the Applicant's commitment to delivering BNG and considers that these commitments will need to be secured with a specific requirement in the DCO. The Applicant will also need to demonstrate that the commitments made to delivering BNG are achievable. The Council encourages the Applicant to work with other developers and stakeholders in the area to identify opportunities to deliver BNG strategically and welcomes ongoing engagement with the Applicant in relation to BNG. Further detailed comments on ecology and biodiversity will be provided in the LIR.	The Applicant notes this comment.

Relevant Representation Number	Representation	Applicant Response
Climate Change		

RR.135	In respect of Carbon and Climate change, as per the comments made at statutory consultation stage, NSDC welcome the significant potential beneficial effect on climate change offered by the proposed development. Further to this, we also welcome a more complete Climate Change Resilience Assessment (CCR), which was only partially complete at the pre-application stage. NSDC note and support the benefits to be achieved by the proposed development, which would bring about predicted net emissions saved of -2,105,192 TCO2e. Notwithstanding the net emissions saved, there is still a substantial amount of emissions predicted to be produced by the proposed development at a figure of 1,972,166 TCO2e. NSDC would encourage the Applicant to consider how emission types generated (across the construction, operation, and decommissioning phases) could be reduced from the 'worst case scenario' currently presented. NSDC are very concerned that the Applicant offers no proposals for further reduction of the carbon impacts of the proposed development. Whilst noting and understanding the current overseas market for PV panel production, the Applicant should demonstrate how they propose to (for example) to source steel for the solar PV mounting structures from UK based suppliers, including those that use electrical arc furnaces rather than fossil fuel fired furnaces, amongst other potential measures and/or the PV modules themselves, noting that these two	The applicant notes and welcomes NSDC's positive comments in relation to the Proposed Development's beneficial GHG effects, and inclusion of a CCR assessment in Part B of Chapter 14 – Carbon and Climate Change [APP-043] which confirms there are no likely significant effects in terms of climate resilience and adaptation. In terms of reducing carbon emissions through all phases of the Proposed Development's lifecycle, as shown in Table 14.4 of ES Volume 1 Chapter 14 – Carbon and Climate Change [APP-043], the vast majority (>97%) of the Proposed Development's carbon emissions are from the supply chain for solar panels and components (including replacements during the project's lifetime). It is recognised that efforts to minimise these emissions will benefit the overall carbon emissions from the project. Measures will be developed within the CEMP [APP-176] and OEMP [APP-177] to ensure that carbon intensity, including embodied carbon from manufacturing and shipping and transport emissions, will be considered in the procurement of solar panels and components. These plans will also outline methods to reduce emissions in other areas, such as the use of electric site plant, consolidation of deliveries, reducing staff travel, etc. Table 3.1 of the CEMP [APP-176] and OEMP [APP-177] provide some examples of measures to be included, which will be further developed prior to commencement. In terms of socio-economic benefits, at present, further detail on the types of jobs (such as the number of full/part-time roles, skill levels, trades and the precise timing of employment demand over the construction period, etc) is not currently available. Once a contractor

Relevant Representation Number	Representation	Applicant Response
	elements comprise approximately 44% of the total Green House Gas (GHG) emissions during the construction phase as detailed within table 14.3. Aligned to any such measures, the Applicant should qualify how any commitments would be secured as part of the DCO process. Further to this, NSDC would also ask the applicant to consider how the above-mentioned mitigation measures, could link to the potential socioeconomic benefits of the proposed development in respect of FTE jobs (directly and indirectly created) during the construction phase of the proposed development, so as to maximise localised job and related economic benefits to the advantage of the NSDC area and its community. Whilst NSDC note the likely significant beneficial effects in respect of Carbon and Climate Change and Socio Economics and Biodiversity, further work is needed on how such benefits could practically be secured as part of the proposed development, should permission be forthcoming, as reflected in earlier comments on topic specific chapters.	has been appointed, additional detail can be provided to stakeholders, and as described below, relevant actions to maximise local benefits will be developed and set out in the final Skills, Supply Chain and Employment Plan (SSCEP). The Outline SSCEP [APP-180] acknowledges the importance of collaboration between the Applicant and local communities, to ensure as much of the employment and upskilling opportunities generated by the Project are realised within the local area and districts. Whilst currently only in outline, the Outline SSCEP identifies the key stakeholders for the Applicant to collaborate with (public sector partners, education and training providers and business sector groups) and proposes a number of actions to effectively promote opportunities for local people and businesses. Biodiversity benefits such as Biodiversity Net Gain (BNG) and hedgerows will be secured by a range of mechanisms including Requirement 8 of the Draft DCO [APP-007] which secures that prior to the commencement of the Proposed Development, a BNG strategy must be submitted to and approved by the relevant planning authority. This will require a Habitat Management and Monitoring Plan. The oLEMP [APP-179] also provide a further mechanism to deliver biodiversity benefits.

Relevant Representation Number	Representation	Applicant Response
Consultation		
AS.002	The lack of information from the developer on any proposed community benefit	From the first point of the project launch, the Applicant has committed to providing a community benefit fund, which would be developed through consultation with the community and local stakeholders. During the first phase of consultation, the Applicant asked a question about what the community would like to see in the community benefit fund. During the second phase of consultation, the Applicant provided more information about the items that had been requested for further feedback. This fund will continue to be developed in consultation with the community if the project is consented. During the pre-application period, the Applicant established a small benefit fund to support local initiatives in advance of the application decision. This fund has already allocated its first round of funding and will continue to provide annual funding for another four years or until the decision is made. The Applicant has also committed to working with local authorities and educational institutions to help ensure opportunities for new jobs created for the construction, operation and decommissioning of the Proposed Development are offered to seek to ensure benefits for local labour when possible, see the Outline Skills, Supply Chain and Employment Plan [APP-180].

Relevant Representation Number	Representation	Applicant Response
RR.135	Lack of local community benefit	From the first point of the project launch, the Applicant has committed to providing a community benefit fund, which would be developed through consultation with the community and local stakeholders. During the first phase of consultation, the Applicant asked a question about what the community would like to see in the community benefit fund. During the second phase of consultation, the Applicant provided more information about the items that had been requested for further feedback. This fund will continue to be developed in consultation with the community if the project is consented. During the pre-application period, the Applicant established a small benefit fund to support local initiatives in advance of the application decision. This fund has already allocated its first round of funding and will continue to provide annual funding for another four years or until the decision is made. The Applicant has also committed to working with local authorities and educational institutions to help ensure opportunities for new jobs created for the construction, operation and decommissioning of the Proposed Development are offered to seek to ensure benefits for local labour when possible, see the Outline Skills, Supply Chain and Employment Plan [APP-180].

Cumulative Impacts

Relevant Representation Number	Representation	Applicant Response
AS.002	There are a significant number of solar farms, BESS Facilities and screening opinions currently being considered and consented by this Local Planning Authority together with DCO consent awarded to other NSIP's within the administrative area. Other NSIP schemes are also under consideration such as Steeples renewable project (awaiting acceptance stage) and the National Grid upgrade (pre-app stage). As such, the cumulative impact of the potential loss of BMV agricultural land should be carefully considered. The submission includes an evaluation of cumulative effects. The planning process has seen the planning applications status updated during the consideration of this project. This matter will be fully re-visited during the Local Impact Report. However, there are a few key decisions that have been made or outstanding both adjacent and within the order limits.	The Applicant considers the cumulative loss of Best and Most Versatile (BMV) land in the Environmental Statement Chapter 18: Cumulative Effects [APP-047], this includes Steeple Renewable Project [EN010163] as well as major projects within 10km of the Site and for any other Battery Energy Storage System (BESS) or Solar Farm Scheme (which meets the cumulative criteria) beyond 10km of the Site (see Environmental Statement Appendix 18.3: Summary of Other Developments included within the Cumulative BMV Assessment [APP-147]). The assessment concluded that if all the 'reasonably foreseeable' schemes within Lincolnshire proceed, the change in land use would be 0.26% (including temporary and permanent schemes). The change in land use in Nottinghamshire (for temporary and permanent schemes) would be 0.14%. It is assumed by 'National Grid upgrade' that it is referring to the North Humber to High Marnham Overhead Line [EN020034]. This was considered in the cumulative assessment and is listed in Environmental Statement Chapter 18: Cumulative Effects [APP-047]. This was not included in the BMV cumulative land lost assessment, as it is assumed to have a land take of less than 20ha. This threshold was advised following the IEMA Guide: A New Perspective on Land and Soil in Environmental Impact Assessment published in 2022, where a permanent land loss of over 20ha is considered a high magnitude of change from the baseline.

Relevant Representation Number	Representation	Applicant Response
	The order limit includes a site has that has secured hazardous substance consent for the proposed storage of a maximum of 4.9 tonnes of Hydrogen at land at the former High Marnham Power Station Fledborough Road High Marnham under planning reference 23/00748/HAZ. The Health and Safety Executive should be consulted on the proposal. A resolution to grant planning permission, subject to a section 106 agreement, has been made at Planning Committee on 23rd April 2025. This proposal includes a Battery Energy Storage System, Substation, Associated Infrastructure and Works and considered under planning reference 24/01138/FUL at Crabtree Lane Energy Hub Land East Crabtree Lane. The proposed output of the development will be 1GW, with the capacity expected to be 4GWh (based on a 4-hour battery energy storage system. This development also includes a 400 kv substation. A screening opinion is currently being considered under planning reference 25/00387/SCR for a BESS with a Storage Capacity of up to 400 Megawatts (MW).	Planning reference 23/00748/HAZ has been considered in the Long List of the Cumulative Assessment, however, it is under a different planning application reference number of 148024 (see ID 60 of Environmental Statement Volume 3 Appendix 18.2: Other Development Long List Stages 1 and 2[APP-146]). The Applicant took forward the planning application 24/01138/FUL for cumulative assessment with regard to landscape and visual effects. It was determined that as the Other Development is surrounded by the Order Limits at construction and operation (year 15) there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development in addition with Other Development. The Applicant will update the cumulative assessment to take account of planning reference 25/00387/SCR for a BESS with a Storage Capacity of up to 400 Megawatts (MW). The Applicant is liaising with the Local Planning Authorities to ensure that the information in the cumulative list is up to date. This additional scheme, as well as any other refinements, will be included in an updated cumulative assessment which will be submitted at Deadline 2.

Relevant Representation Number	Representation	Applicant Response
	The Local Planning Authority has not received a planning application to consider the National Grid substation at High Marnham. It is recommended that the cumulative impact of these proposals and all the NSIP's within the area are considered. An updated list of planning applications and permission will be submitted within the Local Impact Report. Cumulative effects with other NSIP's and large-scale developments in the area.	All NSIPs that are within the Zones of Influence (ZoI) have been included in the cumulative assessment. Additionally, the Applicant has included solar NSIPs throughout both counties of Lincolnshire and Nottinghamshire (beyond the ZOI), following feedback from statutory consultation; this approach is above and beyond PINs guidance on cumulative effects.

Relevant Representation Number	Representation	Applicant Response
RR.032	The cumulative impacts of the One Earth Solar Farm with other solar energy generating station Nationally Significant Infrastructure Projects (NSIP) comprising the Gate Burton Energy Park, Cottam Solar Project, West Burton Solar Project and Tillbridge Solar Project is a key concern for WLDC. The potential environmental, amenity, socio-economic impacts upon communities of West Lindsey will likely be significant and adverse when taken cumulatively. WLDC expects cumulative impacts to be examined rigorously throughout the examination and that the application can only be determined against the cumulative baseline of these other projects (and should not solely be determined on the acceptability of its own impacts alone).	All NSIPs that are within the Zones of Influence (ZoI) have been included in the cumulative assessment. Additionally, the Applicant has included solar NSIPs throughout both counties of Lincolnshire and Nottinghamshire (beyond the ZOI), including Gate Burton Energy Park, Cottam Solar Project, West Burton Solar Project and Tillbridge Solar Project, following feedback from statutory consultation; this approach is above and beyond PINs guidance on cumulative effects. The likely significant effects are reported in Environmental Statement Chapter 18: Cumulative Effects [APP-047] and Table 18.3 shows there could be cumulative effects for landscape character for the construction and operation with Cumulative Scheme ID 27 (21/01577/FULM) and ID 50 EN020034). The Applicant is liaising with the Local Planning Authorities to ensure that the information in the cumulative list is up to date. Should any refinements be necessary, an updated cumulative assessment will be submitted at Deadline 2.

Relevant Representation Number	Representation	Applicant Response
RR.032	2.7. At the date of publication of this RR, the status of each of these project is as follows: § Gate Burton Energy Park (531MW) (Order Limits: 824ha approx.) – Consented 12/07/2024 § Cottam Solar Project (600MW) (Order Limits: 1450ha approx.) – Consented 05/09/2024 § West Burton Solar Project (480MW) (Order Limits: 886ha approx.) – Consented 24/01/2025 § Tillbridge Solar Project (500MW) – (Order Limits: 1670ha approx.) - Recommendation stage- a recommendation is due to be submitted in July 2025 with a decision made by October 2025 2.8. It is therefore clear that a significant amount of solar farm development is being proposed and is already committed within the West Lindsey District. These projects will cumulatively impose significant and adverse impacts on the environment and local communities through their construction, operational and decommissioning phases. WLDC has significant concerns regarding the cumulative impacts of concurrent construction activities associated with all of the projects within the West Lindsey District.	The Applicant is committed to working with other developers to reduce potential cumulative impacts where possible or practicable. While such engagement has not occurred to date, the Applicant will seek opportunities for collaboration. A commitment to work with other developers is already detailed within the oCEMP (APP-176) with regards to a commitment to coordinating works with National Grid Electricity Transmission (NGET) to minimise the impact of the two projects interacting. Construction of the Proposed Development is scheduled to commence in 2027 and complete in 2029. Of the other listed DCO projects—Gate Burton Energy Park, Cottam Solar Project, West Burton Solar Project, and Tillbridge Solar Project—only Gate Burton Energy Park (construction period 2025–2028) and Tillbridge Solar Project (2025–2027) overlap with the Proposed Development's construction timeline. As such, current opportunities for collaboration are limited, although the Applicant will continue to explore and agree on potential joint working where feasible. It is acknowledged that none of the consented NSIPs have commenced construction at the date of this RR; as above the Applicant will continue to explore and agree on potential joint working where feasible.

Relevant Representation Number	Representation	Applicant Response
	2.10. With three NSIP solar generating stations already consented in the West Lindsey District, and the fourth at it recommendation / decision making stage, the potential cumulative construction impacts that would take place should all projects be implemented would give rise to material harm in a number of aspects. 2.11. All of the solar NSIPs have secured, or are seeking, five year commencement periods within their respective DCOs. None of the consented NSIPs have commenced construction at the date of this RR and none of them have submitted any details pursuant to any DCO 'requirement' for approval. This creates a situation where the construction programmes for each NSIP will be likely to overlap, with impacts from all schemes being experienced at the same time and/or over a longer period of up to 10 years (should they be staggered).	It should be noted that the Gate Burton Energy Park, Cottam Solar Project, West Burton Solar Project, and Tillbridge Solar Project are located in close proximity to one another. On 20 June 2023, representatives from all four schemes met to explore opportunities for shared infrastructure. As a result, these projects have considered the potential for shared use of the cable route and have incorporated overlapping elements into their respective Work Plans. These overlaps are intentional, aimed at reducing the environmental and social impacts associated with cable routing. The commitments made are also locality-specific, reflecting the identified potential for interaction between the schemes due to their geographical closeness. In contrast, the Proposed Development is located too far from the Gate Burton, Cottam, West Burton, and Tillbridge projects to share infrastructure. When assessing potential cumulative effects, the Proposed Development identified no such effects in relation to these schemes due to the distance between them. This conclusion is supported by the findings in the latest Joint Report on Interrelationships, submitted by Tillbridge Solar Farm in April 2025 (Document Reference: EN010142-001196-Tillbridge Solar Limited - 7.6 Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Part 1 of 3 - Revision 2 (tracked) .pdf). The report states:

Relevant Representation Number	Representation	Applicant Response
	2.12. WLDC raise significant concerns regarding the level and period of exposure that local communities will be exposed to construction impacts. These impacts will be exacerbated through the lack of binding co-ordination between the projects, resulting in any potential opportunities to minimise impacts not being identified or achieved. 2.13. WLDC also notes that the applicants of the Gate Burton Energy Park, Cottam Solar Project, West Burton Solar Project and Tillbridge Solar Project collaborated to produce a 'Joint Report on Interrelationships', which identified the cumulative impacts of the projects and how these could be managed. Whilst WLDC maintains its position and concerns on the non-binding status of that document, it notes that the applicants for the OESF have not engaged with other projects and is not party to the joint report committing to collaborative working. We have not seen any evidence of any collaborative working between OESF and the other projects thus far.	"*One Earth Solar Farm and Great North Road Solar Park can also be scoped out, as they are too far to have the potential to result in cumulative effects*." A Joint Report on Interrelationships will be submitted as part of the Examination. This will be submitted at Deadline 1.

Relevant Representation Number	Representation	Applicant Response
RR.032	WLDC objects to the OESF due to its cumulative landscape character impacts. As the fifth solar electricity generating station NSIP within West Lindsey District, the project's impacts must be assessed alongside the other projects, which were evaluated against a rural agricultural baseline. No decision maker has yet considered the collective impact of all four projects, making this application unique. 2.25. WLDC believes the cumulative impacts of the three existing NSIP solar farms have already reached a tipping point of harm to the landscape character. The addition of the OESF would exacerbate this harm, leading to a stark and rapid transformation from a rural landscape to one dominated by modern infrastructure. This change, spanning approximately 25km north to south, is unprecedented and unacceptable.	The approach to assessing cumulative landscape and visual effects is consistent with PINS Guidance on Cumulative Effects, and follows a proportionate methodology as outlined in GLVIA3. The assessment focuses on Other Developments within the agreed 2 km LVIA Study Area. It is noted that the nearest of the identified additional schemes lies between 4.68 km and 16.5 km from the Proposed Development, with the West Burton Solar Project being the closest. Within the Landscape and Visual Impact Assessment ([APP-040]), the Proposed Development was assessed as having a negligible effect during construction, operation and maintenance, and decommissioning on the following character areas: • National Character Area 48 – Trent and Belvoir Vales • The Floodplain Valley and Unwooded Vales Character Areas of the East Midlands Regional Landscape Character Assessment As detailed in ES Chapter 18: Cumulative Effects ([APP-047]), effects assessed as negligible from the Proposed Development were excluded from the cumulative assessment. This is on the basis that negligible effects are typically minimal or imperceptible, and therefore unlikely to contribute meaningfully to cumulative impacts alongside Other Developments.

Relevant Representation Number	Representation	Applicant Response
	2.26. The situation of four adjacent NSIP projects is unique and has not been addressed under the Planning Act 2008. WLDC argues that this constitutes an 'exceptional circumstance' under NPS EN-1 (para. 4.2.15). The cumulative landscape character impacts must be considered kinetically and sequentially, appreciating the scale of change across the district. This requires understanding how the projects collectively create significant adverse impacts. 2.27. In summary, WLDC maintains that the OESF, when combined with the other NSIP projects, imposes unacceptable cumulative landscape character impacts across the District. The rapid and extensive transformation of the landscape is unprecedented and must be carefully considered in the decision-making process.	The potential cumulative effects of the large-scale solar schemes in the Gainsborough area — including Cottam, West Burton, Tillbridge, and Gate Burton — were considered during their respective Examinations. For example, a Technical Note on Cumulative Effects of Additional Schemes ([EN010132/REP5-030]) was submitted to the West Burton Solar Project Examination and concluded that no intervisibility exists between the schemes due to factors such as separation distance, intervening topography, built structures, and vegetation. As a result, no significant cumulative landscape and visual effects were identified during construction, operation (at both Year 1 and Year 15), or decommissioning phases. Given the separation distance between the One Earth Solar Farm and the Gainsborough area schemes (outside of the 2 km LVIA Study Area), the previous examination reports further support the conclusion that significant cumulative effects on landscape and visual receptors (with One Earth and the Gainsborough area) are unlikely.

Relevant Representation Number	Representation	Applicant Response
	2.28. WLDC believes a thorough understanding of large-scale cumulative visual effects requires an assessment based on traveling through the landscape and the District as a whole (not just a defined study area from the OESF site). The solar projects will be visible along major highways and minor roads, offering limited relief from their visual impacts. WLDC contends this is an exceptional circumstance not foreseen in NPS policy	

RR.135	At the pre-application stage and in response to the Applicant's Statutory Consultation, NSDC identified that the explanation and justification around cumulative affects was paramount to ensure that element of the assessment was both robust and thorough. Whilst NSDC were afforded the opportunity to comment on the 'long list' of developments considered, that is the extent of the engagement that has taken place in respect of this topic area in respect of the issue of cumulative effects. As such, there has been no discussion on the approach and methodology for assessment. In respect of the general approach, NSDC note that the Applicant has followed the advice as contained within the Guidance – Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment13. In this respect, it is noted that the Zone of Influence (ZOI) to support the desk based of cumulative assessment in many cases relies on the study areas themselves for the assessment topic, but to qualify, whilst NSDC may have agreed study areas during the pre-application stages, this has not been done with respect to identifying possible cumulative effects, but rather relates to the scope and extent of individual topic areas and sensitive receptors within the study areas. For example, whilst the study area was agreed with regard to the LVIA, NSDC take a different view with regard to the schemes that should be captured with regard to LVIA cumulative impacts, as presented in our response to Chapter 11 of the ES as detailed earlier in this	Following feedback from statutory consultation, the Applicant extended the long-list of cumulative schemes by considering solar NSIPs throughout both counties of Lincolnshire and Nottinghamshire (beyond the ZOI). As such the cumulative assessment considers Beacon Fen, Heckington Fen, Mallard Pass, and Temple Oaks in the Long List Stages 1 and 2 (see ES Volume 3 Appendix 18.2: Other Development Long List Stages 1 and 2[APP-145]) as it met the criteria for an Other Developments beyond 10km from the Proposed Development (as set out in ES Volume 1 Chapter 18: Cumulative Effects [APP-047]). However, all of these Other Developments are over 40km away from the Proposed Development and not within the ZoI for any technical aspects, and as a result were not taken in for a cumulative assessment to ensure the assessment was proportionate. Gate Burton is only within the ZoI for International / European Ecological Sites, however it was not taken for further cumulative assessment (see ES Volume 3 Appendix 18.2: Other Development Long List Stages 1 and 2[APP-145]). This is due to the distance between the two developments (9.44km) resulting in no impact pathway to lead to indirect effects as a result of land take. It is also notable that the only pathway of effect to European sites is via the River Trent and its links to the Humber Estuary Special Area of Conservation (SAC), the Gate Burton Energy Park has been considered within the Shadow Habitat Regulations Assessment (HRA) [APP-165]). However, a minor update to the Shadow HRA will be completed to provide clarify that Gate Burton Energy Park has been appropriately considered at Deadline 1. It is noted that Natural

	correspondence. During the pre-application stage, in informal written correspondence exchanged with the Applicant, NSDC advocated a pre-cautionary approach to cumulative assessment that reflected the concentration of other NSIP projects within Nottinghamshire and Lincolnshire and we recommended that the Applicant capture all current NSIP projects in Nottinghamshire and Lincolnshire which at that time included the following additional projects (beyond those identified within the immediate NSDC district): • Beacon Fen; • Gate Burton; • Heckington Fen; • Mallard Pass; • Temple Oaks. NSDC made these comments to reflect the concentration of large-scale projects within the two county areas and given the potential cumulative effects during both the construction and operation stages of development. There was no further dialogue sought by the Applicant on this topic area after these comments were made. Alongside Chapter 18, NSDC has reviewed the associated Appendices to this chapter, which includes the following: • 6.21 – Appendix 18.1 – Other Developments – Long list. • 6.21 - Appendix 18.2 Summary of Other Developments included within the Cumulative BMV Assessment. • 6.21 Appendix 18.3 Summary of Other Developments included within the Cumulative BMV Assessment. • 6.21 Appendix 18.4 High Marnham Substation Cumulative Carbon. We have the following further comments on the above-mentioned documents.	England's relevant representation confirms they are content with the conclusions presented in the Shadow HRA. In relation to the Great North Road Solar and Biodiversity Park and inclusion in the cumulative assessment, the ZoI for Biodiversity were derived using guidance from CIEEM (2018, updated 2024) guidance on Ecological Impact Assessment. It is also notable that the only pathway of effect to European sites is via the River Trent and its links to the Humber Estuary SAC, the Great North Road development does not have any impact on the River Trent and therefore a cumulative effect can be discounted. It is noted that Natural England's relevant representation confirms they are content with the conclusions presented in the Shadow HRA. The Hydrology ZoI was based on whether there would be an impact pathway between the two developments. Additionally, both developments will have to have a Construction Environmental Management Plan (CEMP), Flood Risk Assessment (FRA) and Surface Water Drainage Strategy agreed, which as a result will lead to no significant cumulative interaction. Regarding Appendix 18.3 Summary of Other Developments included within the Cumulative BMV Assessment [APP-147]– to clarify, the developments included are from the Lincolnshire and Nottinghamshire areas where there is a loss of BMV land that is assumed to be 20ha or greater, as well as the other criteria set out in paragraph 18.3.21 of [APP-047]E].

Relevant Representation Number	Representation	Applicant Response
	In respect of Appendix 18.2, we acknowledge that the additional NSIPS projects are captured in this document, but in all cases we note that they have not been subject to further assessment. We are particularly concerned that the other Solar NSIP Project (Great North Road) is not subject to further (stage 3/4) assessment and therefore is not considered further. NSDC consider that the audit trail for identifying the short list of developments is lacking in specific and reasoned justification (for example in respect of the ZOI areas). As such, NSDC consider that these further projects should be subject to further consideration within Chapter 18 of the ES. Turning to Appendix 18.3, we note that a summary of other developments included within the Cumulative Assessment for Best and Most Versatile (BMV) Agricultural Land is provided. It is not clear whether this includes all relevant (based on their stage of progression as a project) development proposals within the Lincolnshire and Nottinghamshire areas where there is a loss of BMV land. Based upon the wording within paragraph 18.5.4 of Chapter 18 of the ES, this is assumed to be the case, but the Applicant should clarify this point.	

Relevant Representation Number	Representation	Applicant Response

Turning back to Chapter 18 of the ES and BMV, NSDC note that paragraph 18.5.9 states: 'The land within the Order Limits that is classified as BMV land occupies 705.48ha. Of this approximately 170.81ha will be permanently removed from agricultural land use (for ecological enhancement areas, substation, and BESS sites) and 534.67 ha will be used temporarily (for solar PV infrastructure) and will return to agricultural land use after the operational stage of the Proposed Development.' Paragraph 18.5.10 goes on to state that 'a large number of other developments being considered are also solar farm developments, therefore the majority of land used within these schemes will be out of agricultural land use temporarily and will be returned to agricultural use at the end of the operational period for the scheme. Therefore, after the operational stage of the Proposed Development, inter-project cumulative effects are considered minimal in the context of the remaining BMV available at a county level.' Whilst NSDC note the comments above, it would appear that the conclusions of cumulative assessment in respect of BMV places significant reliance on 'temporary' losses. Whilst it is acknowledged that the proposed development (and other solar farms) are not designed to be permanent, the BMV land will be unavailable for a period of 60 years should permission be forthcoming. Such an extensive period of time establishes a degree of permanence that could equate to the permanent lifespan of other forms of development and the weight to be afforded must

Relevant Representation Number	Representation	Applicant Response
	carefully balance this point. NSDC remain concerned at this stage on the cumulative loss of BMV land within its district, which in case of the proposed development comprises around 53% of the total Order Limits area, of which 170.81ha will be permanently removed from agriculture. NSDC have no comments on Appendix 18.4.	

Relevant Representation Number	Representation	Applicant Response
RR.154	The submission includes an evaluation of cumulative effects that considers potential for both Intra- Project and Inter-Project impacts. From this headline review it can be seen that several Significant Adverse Intra-project effects relating to Landscape and Visual maters are noted at Construction, Year 1, Year 15 and at Decommissioning within Chapter 18: Cumulative Effects of the ES. These will be investigated more fully in the full review. In regard of Inter-Project cumulative effects, Figure 18.9: Best and Most Versatile (BMV) Agricultural Land and Other Developments, shows there are a large number of other significant schemes clustered within the regional location of this proposed development. Many of these schemes relate to solar energy production and could have similar large-scale landscape and visual effects that have the potential to affect Regional and possibly National Landscape Character Areas. The inter-relation of these will be more fully examined in the full review, it is however noted that the application submission already identifies Moderate to Major adverse cumulative effects from two other schemes.	Noted.d

RR.077	Cumulative Impacts The Council wishes to draw to the attention of the Examining Authority (ExA) the unprecedented number of DCO projects that are currently on-going in Lincolnshire which may result in other examinations taking place in the County at the same time. A further wave of potential DCO projects are progressing through their pre-application stage. The Council wishes to be fully involved in all these examinations but has only limited resources and personnel and therefore requests that careful and sensitive attention is given to examination timetables to ensure that hearings and deadline dates consider those of other projects that will be under examination during 2025. In addition, the Council seeks assurance as to how the ExA will take into consideration further major developments and NSIPs and associated details as they emerge in the geographical area of this application. The Council requests that the ExA implements a mechanism as adopted by the ExAs for the solar projects in western Lincolnshire (immediately to the north west of One East Solar Farm) where each applicant was required to produce an inter- relationship report at the start of their examination, which was subsequently updated at each deadline during the examination. A further example is the Outer Dowsing Off-Shore wind project in the east of Lincolnshire; an interrelationship report considering all current NSIP's in	All NSIPs that are within the Zones of Influences (ZoI) have been included in the cumulative assessment. Additionally, the Applicant has included solar NSIPs throughout both counties of Lincolnshire and Nottinghamshire (beyond the ZOI), following feedback from statutory consultation; this approach is above and beyond PINs guidance on cumulative effects. The likely significant effects are reported in Chapter 18: Cumulative Effects [APP-047] and Table 18.3 shows there could be cumulative effects for landscape character for the construction and operation with Cumulative Scheme ID 27 (21/01577/FULM) and ID 50 EN020034). A Joint Report on Interrelationships will be submitted as part of the Examination. This will be submitted at Deadline 1.

Relevant Representation Number	Representation	Applicant Response
	Lincolnshire was submitted to that examination. These reports capture information from emerging NSIPs, and as details about the projects becomes available requires the applicant to undertake further assessments to assess how these impact on the cumulative impact assessments that have been prepared in the submitted ES. This will provide the ExA, the host authorities and others an opportunity consider the potential cumulative impacts from all these projects as they emerge and the necessary mitigation measures that will be needed. The Council will make further comments on the applicant's assessment of cumulative impacts and on the potential cumulative impact of the development with other developments including NSIP proposals in the LIR and in written representations and update as necessary as further information on other projects comes forward throughout the examination.	
DCO		

Relevant Representation Number	Representation	Applicant Response
RR.032	WLDC raises concerns on the wide scope that the definition of 'maintenance' in the dDCO provides. 2.36. The scope of the definition has the effect of allowing a developer to effectively replace a whole NSIP project over its lifespan. Applicants have confirmed that panels, BESS and other associated development will need to be replaced at least once during the project, which have the potential for significant adverse environmental effects. 2.37. These impacts will be exacerbated on a cumulative basis with other NSIP solar project in the District, which will be required to replace and reconstruct solar panels, BESS and associated plant at similar stages in their project lifespans. 2.38. There is also no mechanism for WLDC to consider the impacts of 'maintenance' and place any controls on what will be decommissioning and construction activity throughout the operations phase of the Scheme.	A definition of "maintain" has been added to make clear what activities are authorised under Article 5 (power to maintain authorised development) during the operation of the authorised development. The Applicant is satisfied that this definition of maintain is not too extensive and widely drawn, and the definition expressly provides that "maintain" does not include the replacement of the whole of the authorised development. The definition has been drafted to directly reflect the nature and context of the authorised development, which will need to be properly maintained, managed and protected throughout its operational lifetime. The drafting, therefore, reflects this operational period and likely framework of maintenance that will be required while enabling technological and practice advancement and improvements within identified environmental performance standards. Paragraph 4.2.2 of the Explanatory Memorandum **[APP-008]** sets out examples of the activities anticipated to be covered.

Relevant Representation Number	Representation	Applicant Response
	2.39. Linked to the above, WLDC is concerned that there is little detail on the approach to managing waste deriving from the replacement of what could be significant amounts of the project. There is no detail on how the waste would be handled, transferred and dealt with. WLDC understands from information provided on other solar NSIP projects in the District that there is no capacity within the county, region or country to deal with such waste.	Article 5 of the draft DCO only authorises maintenance to be carried out where there are no materially new or materially different environmental effects that have not been assessed in the environmental statement. Therefore, the definition of "maintain" already contains limits. This drafting is in direct response to the Planning Inspectorate's advice page "Nationally Significant Infrastructure Projects - Advice Note Fifteen: drafting Development Consent Orders" in which Applicants are advised to take care to ensure that the definition of maintain does not seek to authorise activities which may generate significant effects beyond those assessed in relevant environmental information, notably the ES. An assessment of operation (including maintenance) is provided in section 1.9 of 6.21 Appendix 2.3 Materials and Waste Impact Assessment [APP-082]. Significant waste effects are not expected during operation of the Proposed Development. In reference to 2.37, a cumulative assessment is provided in section 1.10 of 6.21 Appendix 2.3 Materials and Waste Impact Assessment [APP-082].

Relevant Representation Number	Representation	Applicant Response
		In reference to 2.38, an assessment of operation (including maintenance) is provided in section 1.9 of 6.21 Appendix 2.3 Materials and Waste Impact Assessment [APP-082]. Significant waste effects are not expected during operation of the Proposed Development. As stated in paragraph 1.8.4 of the Materials and Waste Impact Assessment "The construction of the Proposed Development will be subject to measures and procedures defined within a Construction Environmental Management Plan. (CEMP) and Site Waste Management Plan (SWMP). The CEMP and SWMP are secured by requirements in the DCO and include the implementation of industry standard practice and control measures for environmental impacts arising during construction, including the approach for materials and waste management on-site. These measures are set out in the Outline CEMP (see Volume 7, Other Documents [EN010159/APP/7.4]) and Outline SWMP (Volume 7, Other Documents [EN010159/APP/7.12]) submitted with the DCO Application. The construction contractor will use the Outline CEMP and Outline SWMP to produce their CEMP and SWMP respectively, prior to works commencing on-site." As stated in the Draft DCO Construction environmental management plan requirement

Relevant Representation Number	Representation	Applicant Response
		"13. – (1) No part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by the relevant planning authority for that part, such approval to be in consultation with the relevant county". As stated in paragraph 1.8.5 of the Materials and Waste Impact Assessment "The operation of the Proposed Development will be subject to measures and procedures defined within an Operational Environmental Management Plan (OEMP) secured by a requirement in the DCO. The OEMP will include the implementation of industry standard practice and control measures for environmental impacts arising during operation, such as the approach for materials and waste management on-site. These measures are set out in the Outline OEMP submitted with the DCO Application (see Volume 7, Other Documents [EN010159/APP/7.5]). The Applicant will use the Outline OEMP to produce their OEMP prior to the operation of the Proposed Development." As stated in the Draft DCO Decommissioning and restoration requirement

Relevant Representation Number	Representation	Applicant Response
		"20. – 14.—(1) Prior to the date of final commissioning for any part of the authorised development, an operational environmental management plan for that part must be submitted to and approved by the relevant planning authority for that part, such approval to be in consultation with the relevant county authority for that part, as the local highway authority and waste planning authority, and the Environment Agency." As stated in paragraph 1.8.6 of the Materials and Waste Impact Assessment "The decommissioning of the Proposed Development will be subject to measures and procedures defined within a Decommissioning Environmental Management Plan (DEMP) secured by a Requirement in the DCO. An Outline DEMP is submitted with the DCO application which includes the approach for materials and waste management on-site (see Volume 7, Other Documents [EN010159/APP/7.6]). The decommissioning contractor will use the Outline DEMP to produce their DEMP prior to decommissioning works on-site." As stated in the Draft DCO Decommissioning and restoration requirement 20. – (5) No decommissioning works may be carried out until the relevant planning authority has approved the decommissioning environmental management plan submitted in relation to those works, in consultation with the Environment Agency and Natural England. decommissioning environmental management plan for approval".

Relevant Representation Number	Representation	Applicant Response
		In reference to 2.39, an assessment of operation (including maintenance) is provided in section 1.9 of 6.21 Appendix 2.3 Materials and Waste Impact Assessment [APP-082]. Significant waste effects are not expected during operation of the Proposed Development. As stated in paragraph 1.8.5 of the Materials and Waste Impact Assessment "The operation of the Proposed Development will be subject to measures and procedures defined within an Operational Environmental Management Plan (OEMP) secured by a requirement in the DCO. The OEMP will include the implementation of industry standard practice and control measures for environmental impacts arising during operation, such as the approach for materials and waste management on-site. These measures are set out in the Outline OEMP submitted with the DCO Application (see Volume 7, Other Documents [EN010159/APP/7.5]). The Applicant will use the Outline OEMP to produce their OEMP prior to the operation of the Proposed Development."

Relevant Representation Number	Representation	Applicant Response
		As stated in the Draft DCO Decommissioning and restoration section "20. – 14.—(1) Prior to the date of final commissioning for any part of the authorised development, an operational environmental management plan for that part must be submitted to and approved by the relevant planning authority for that part, such approval to be in consultation with the relevant county authority for that part, as the local highway authority and waste planning authority, and the Environment Agency."

Relevant Representation Number	Representation	Applicant Response
		A cumulative assessment is provided in section 1.10 of 6.21 Appendix 2.3 Materials and Waste Impact Assessment [APP-082]. As stated in Paragraph 1.10.10 "The cumulative assessment focuses on decommissioning waste since: The peak of waste generation would be during decommissioning and this is therefore the worst case in terms of waste generation – the decommissioning scenario would also cover any large-scale interim replacement of PV modules and other components; and operational waste generation is not expected to be concurrent for all projects, given that their PV modules and other components would have different operating periods and it is very unlikely that all facilities would replace their equipment at the same time." As stated in paragraph 1.9.23 of 6.21 Appendix 2.3 Materials and Waste Impact Assessment [APP-082] "recycling routes are generally available for decommissioning materials at present, and it is likely that there will be even greater opportunities for recycling in the future, not least because the market will have expanded to meet demand as solar PV installations increase."

Relevant Representation Number	Representation	Applicant Response
RR.077	Draft Development Consent Order At this stage the Council reserves its position on the relevant parts of the draft DCO including the proposed requirements which are likely to be needed, to be amended or added to as the examination progresses. The Council will review the draft DCO to ensure that the Council's role is sufficiently recognised as a discharging authority in relation to relevant requirements and that the Council's role as Highway Authority is appropriately referenced within the draft DCO in relation to any proposed highway works or traffic regulation measures. The Council wishes to participate in any Issue Specific Hearing in relation to the drafting of the DCO. In conclusion the Council looks forward to working with the Applicant and the Planning Inspectorate as the project progresses through the DCO process and welcomes the opportunity to comment on matters of detail throughout the examination	This is noted, and the Applicant welcomes further discussions on the points raised. The Applicant has tried to take on board LCC's preferred approach to DCO drafting based on experience of other schemes, in its drafting of the draft DCO for the Proposed Development.
RR.077	Grid Connection	The Applicant considers that the Secretary of State can be satisfied there is no obvious reason why the High Marnham substation works would not come forward, and there is no justification for any requirement being imposed on the Proposed Development in this respect.

	It is noted that One Earth Solar has a grid connection agreement which relies on connection to a new substation being promoted by National Grid at High Marnham. The EN010159/APP/7.2 Grid Connection Statement [APP-174], states that engagement with NESO provides a connection date of 2029. The proposed new High Marnham substation will require consent under the Town and Country Planning Act 1990 (as amended). The National Grid project website indicates that the planning application would be submitted in early 2025, with construction commencing summer 2026 and a fully operational substation being achieved by winter 2029. A planning application for the proposed new High Marnham substation has not yet been submitted. Construction of the One Earth Solar Farm according to Paragraph 5.5.1 of the Environmental Statement (ES) Volume 1: Chapter 5: Description of the Proposed Development of Construction [APP-034] is proposed to commence in 2027.This raises a potential issue, with the mobilisation and construction of the Solar Farm potentially commencing prior to the determination of the planning application for the proposed new High Marnham substation. Clarity is required on how the two projects would align should there be slippage in the timescales for the delivery of the High Marnham substation, or the proposed High Marnham substation development does not come to fruition. Should the Secretary of State (SoS) be minded to grant the DCO, the Council are of the view that the DCO should make	Paragraph 4.11.8 of NPS EN-1 anticipates and allows for the circumstance in which "it may not be possible to coordinate applications" and paragraphs 4.11.8 and 4.11.9 go on to set out what the Applicant needs to satisfy the decision maker of in that situation. The Applicant has addressed the requirements of these paragraphs, including that there is no obvious reason why the application for the High Marnham substation should be refused. National Grid has indicated it is pursuing an application for planning permission for the High Marnham substation, and the Applicant understands this will be submitted in Q4 of 2025, and the Applicant anticipates planning permission being granted, having regard to relevant planning policy. Paragraph 4.11.8 of EN-1 requires an applicant to include information on other elements, and the Applicant has complied with this by providing information about the High Marnham substation including as set out in its cumulative assessment at, Chapter 18: Cumulative Effects [APP-047]. The Applicant has a grid connection agreement with National Grid, and as the system operator, National Grid is under certain obligations to deliver on the grid connection under the agreement in place. In this respect, the Applicant has provided a Grid Connection Statement [APP-174] which aims to give confidence in how the grid connection will be provided. This sets out that there has been a grid connection offer and agreement with National Grid to deliver the connection in 2029 and it is under general obligations to do so. Based on NGET's Transmission Owner's Licence: Standard Licence Condition D4A: Obligations in Relation to Planning, NGET is required to undertake all reasonable steps to obtain the required consents.

Relevant Representation Number	Representation	Applicant Response
	provision through a requirement to restrict the commencement of the One Earth development until a particular point of surety has been reached with the High Marnham Substation.	Finally, the commercial reality is such that it is not realistic or even likely that there would be a situation in which the Applicant built out the entire solar farm without any grid connection; the situation raised by the Council is therefore not a realistic one. In terms of slippage in predicted timescales, the ES can only be based on worst-case assumptions, which is a reasonable worst case. There is a lock in place via paragraph 2(4), Schedule 15 of the Draft DCO [APP-007]. Pursuant to Schedule 15, when the Applicant is discharging requirements, it will need to confirm that the subject matter being approved would not be likely to give rise to any materially new or different environmental effects compared to those in the ES. In this way, the Applicant is bound by the effects contained in the ES.

Relevant Representation Number	Representation	Applicant Response
		With respect to the suggestion that a requirement should be imposed, the Applicant disagrees that this is necessary, for all the reasons set out above. There is no policy requirement that the High Marnham substation needs to be consented with or ahead of the Proposed Development nor for any requirement to be imposed. The Applicant has complied with the requirements in EN-1 and provided the confirmation necessary in relation to the National Grid High Marnham substation, and there is no policy support nor justification for a requirement. In fact NPS EN-1 emphasises the urgency with which schemes such as the Proposed Development need to be delivered, for example at paragraph 4.2.2 "*Our energy security and net zero ambitions will only be delivered if we can enable the development of new low carbon sources of energy at speed and scale*."
RR.135	NSDC have thus far had limited opportunity to consider the Draft Development Consent Order document, other than a draft version that was presented at a Workshop session immediately before the application was submitted. As such, the below represents a summary of our initial comments and observations only, including some overarching points. General Observations	The Applicant has drafted the draft DCO having regard to the specific requirements of the Proposed Development. With respect to vegetation removal and the powers in Articles 39 and 40, the Applicant considers that there are adequate controls in place. With respect to the operation of the power in Article 39 (felling or lopping of trees and removal of hedgerows) the Applicant comments as follows:

Relevant Representation Number	Representation	Applicant Response
	As the Draft DCO is developed, the Applicant should make it clear that all of the general powers sought in relation to the DCO are informed by a detailed understanding of the impacts of the proposed development, based on the design proposals and environmental assessment work. For example Article 39 (Felling and Lopping of Trees and Removal of Hedgerows) and Article 40 (Trees Subject to a Tree Preservation Order) currently rely on far reaching general powers to undertake works or fell trees where 'it reasonably believes it to be necessary to do so in order to prevent the tree from obstructing or interfering with the construction, maintenance, operation or decommissioning of the authorised development.' NSDC consider that this should not be done at the expense of the proper understanding of the impacts of the proposed development and such powers must be properly explained and justified by the Applicant, particularly where no obligation exists to replace felled TPO trees as detailed in Article 40. NSDC considers the design and assessment work should inform the powers sought in the draft DCO and general wide-reaching powers that are not proportionate should be avoided.	• The power in the Article is subject to the DCO requirements in Schedule 2 of the draft DCO, including requirements for compliance with the approved CEMP. Should the DCO be granted consent, detailed LEMP(s) will be produced for the Proposed Development in accordance with Requirement 8, Schedule 2 of the Draft DCO [APP-007]. The LEMP(s) would confirm the extent of vegetation removal during construction and would require approval prior to commencement of construction and would be required to be substantially in accordance with the framework set out in the oLEMP [APP-179]. This provides oversight for the Councils in terms of approving this plan; and • Anticipated vegetation loss associated with the Proposed Development is shown on the Vegetation Removal Plan provided within the oLEMP [APP-179]. This plan provides an indication of the expected maximum extent of vegetation removal during construction and the detailed LEMP would need to be substantially in accordance with those parameters. The precise location of vegetation removal may differ from those parameters, however, the parameters show the likely maximum extent of vegetation that would need to be removed during construction. The outline LEMP also makes clear at paragraph 5.3.6 that "Removal of existing trees will only occur where access is required" and that "crossings will, wherever possible, be located at current field access locations or in areas where there are existing gaps in the hedgerow and no trees".

Relevant Representation Number	Representation	Applicant Response
	Schedule 2 – Requirements At the present time we consider that NSDC would be responsible for the most appropriate requirements relative to its normal planning functions and expertise. However, we have not yet had the opportunity to consider in detail the wording of those requirements and confirm their acceptability. Any further specific comments will be made within the examination phase in this regard. In addition to this, we consider whereby the determining authority is Nottinghamshire County Council in respect of requirements, this should include a set consultation with NSDC as the relevant district Council. This provision should also apply whereby NSDC are the determining planning authority for the purpose of discharging requirements.	More generally, the Proposed Development has sought to integrate the Proposed Development into the existing landscape pattern by utilising and aligning with existing features, including vegetation, as set out at paragraph 4.1.4 of the outline LEMP [APP-179]. Paragraph 4.1.4 continues to explain that the design aims to "replace habitats lost during construction and enhance habitats within the Solar PV Areas through the creation and enhancement of hedgerows, scrub, grasslands and riparian habitats. Where it has proven necessary to remove vegetation, the extent of vegetation removal has been minimised through measures set out in the outline LEMP such as at paragraph 5.3.12 which states that "where hedgerows are present within visibility splays at access and egress points from the local highway network, vegetation management will be used to maintain safety... hedgerows will be reduced in height to 0.9m to allow suitable visibility, whilst avoiding hedgerow removal" In terms of removal of vegetation during operation of the Proposed Development, for trees and shrubs that are not protected by a TPO, the Applicant does not consider additional controls are necessary. Article 39 is clear in terms of the limited scope in which the undertaker may fell or lop a tree or shrub, as listed in paragraph (1)(a) – (c) of the article, and then further caveated by paragraph (2). This means removal is limited to where trees are creating an obstruction or interference, constituting a danger, or obstructing construction vehicles.

Relevant Representation Number	Representation	Applicant Response
	Schedule 15 – Procedure for Discharging Requirements Part 2 – Application made under requirement – NSDC consider that notification of a decision within 10 weeks as a standard approach is insufficient. NSDC are particularly concerned with the resourcing of such requirements and therefore consider that a more appropriate default period equating to Major EIA development for a planning application of 16 weeks is more appropriate. Whilst NSDC note that Part 2(c) includes for the ability to agree an alternate period, the expectation for 10 weeks would be set by its inclusion in the standard wording. To afford an extra 2 weeks beyond the normal discharge of condition application period for an LPA is not considered sufficient. The project is significant in size and scale and the information submitted for many of the requirements is likely to involve a significant amount of information and an appropriate time period must be afforded for NSDC to consider this. NSDC notes that this issue would be compounded by another major DCO Solar NSIP project (Great North Road) in the south of the District, which is following a similar timeline to the One Earth Project alongside the day-to-day statutory functions of the planning department.	In addition, the LEMP approved pursuant to Requirement 8 will include positive provisions relating to management and monitoring of vegetation / planting to ensure mitigation is maintained; see measures relating to vegetation management throughout section 5, which includes both establishment maintenance measures for new planting as well as long term maintenance measures, as well as monitoring provisions in section 7. With respect specifically to lopping or pruning of vegetation, this type of work would be covered by general management measures in the LEMP. The outline LEMP [APP-179], at paragraph 5.3.5, states that "Retained trees will be periodically inspected by an arboriculturist during construction. Where construction works are adjacent to retained trees, works will be undertaken under a watching brief to record root loss and to recommend further arboricultural works where required." Paragraph 5.3.4 states that pruning will be undertaken "outside of the bird breeding season and in accordance with hedgerow regulations." Beyond construction, the existing trees will be managed to "provide longevity, increase species diversity, enhance habitat value and improve resilience to climate change (para 5.3.3).

Relevant Representation Number	Representation	Applicant Response
	Part 5 – Fees – NSDC consider that the fee level proposed by the Applicant is insufficient. The fee structure includes an initial fixed fee of £2,535.00 for the first application for the discharge of some of the requirements, then a downward sliding scale of £578.00 per submission for other requirements and then £145.00 for any requirement not listed. Whilst NSDC note that the Applicant may consider such provision reasonable under 'precedent drafting' we consider it unlikely reflects the reality of the resourcing of such requests, particularly where such requests were linked to the phasing, possibly involving multiple submissions for the different phases, with a fee budget that continues to fall. NSDC would welcome the opportunity to discuss this further with the Applicant so an appropriate fee level can be set and/or a mechanism for negotiating an appropriate fee, should permission be forthcoming.	With respect to Article 40 (trees subject to tree preservation orders), the Applicant proposes adding wording to the outline LEMP [APP-179] to provide that where an individual tree subject to a TPO must be removed (for example, due to it being dead or in a dangerous condition) and the local authority requires a replacement, a new tree will be planted in the same place or as near as practicable. The Applicant considers that the power in Article 40 is appropriate, given the 60 year operational life of the Proposed Development and that there are individual trees across the Order limits that are of high quality and value and could potentially become the subject of a TPO in the future. This comment is noted. The Applicant has drafted the requirements having regard to the usual duties or areas of responsibility for the District and County Councils and having regard to the approach taken to date on made solar DCOs. We welcome further discussion in this respect.

Relevant Representation Number	Representation	Applicant Response
		In terms of the discharge period applied under the Schedule, the Applicant maintains that the ten-week period should be retained as the Proposed Development is a NSIP for which there is a critical national priority. An eight to ten week period is fairly standard for energy DCOs and is the same or longer than a number of others (for example, Heckington Fen, East Yorkshire, Sunnica, West Burton, Gate Burton, and Mallard Pass). Moreover, PINS Advice Note 15 attaches standard drafting in relation to discharge of certain approvals, which sets out a 42-day decision making period, and the Applicant is proposing a timeframe in excess of this. Paragraph 2 of Schedule 15 of the draft DCO [APP-007] does not preclude a longer period than ten weeks being agreed between the parties, and in practice the Applicant is likely to agree to additional time rather than risk the Councils refusing the application. However, given many of the applications for discharge of requirements should be able to be dealt with within ten weeks, the Applicant would prefer the default position to require a shorter time, with the option to extend. The Applicant is open to further discussion on this point, however, it would reiterate that the fee schedule as drafted aligns with most made solar DCOs to date, where in many cases the fees included have been agreed with the local authorities.

Relevant Representation Number	Representation	Applicant Response
RR.154	The DCO should be developed to explicitly contain a mechanism that allows coordination of any programmed works with any existing utility works, so that the Highway Authority can help to minimise overall environmental and operational disruption on the highway network. The Highway Authority needs to ensure its statutory duty to ensure the expeditious movement of traffic on the highway network is not compromised. Any powers to undertake works on the highway network should not fully circumvent the HA's system to coordinate road works and powers to impose a TTRO should remain with the County Council who will carry out the necessary promotions and consultations. This should be established by the Legal Team in conjunction with the Highway Team. Green Infrastructure	The Applicant's draft DCO [APP-007] confirms that the Counties' permit schemes apply in relation to street works authorised by Article 8 of the draft DCO. That allows the Counties necessary programming control with respect to street works. Highway works proposed to be authorised under the draft DCO include necessary oversight by the highways authority, reflecting also that the DCO regime is intended to be able to wrap up various consents within the one piece of legislation. Further, the outline Construction Traffic Management Plan [APP-181] at 3.2.7 requires the approval of the detailed design of highway works by the highway authority and sets out what the submission of details for such approval will include. Similarly, with respect to the TTRO article, necessary controls are in place via that article. The Applicant has had initial discussions with the local highway authorities in relation to the draft DCO provisions and will continue those discussions.

Relevant Representation Number	Representation	Applicant Response
	The order limits include part of National Cycle Route (NCR) 647 which is managed by NCC on behalf of Sustrans and Railway Paths Ltd. It is not immediately clear from the application documents what the impacts on NCR 647 will be though it is covered by Works Area 5. The Outline Public Rights of Way Management Plan (PROWMP) states that NCR 647 will remain open during construction and implies that any interaction with construction activity is unlikely to have an impact on its operation. However, NCC wishes to secure explicit confirmation within the PROWMP that any damage caused to the site as a result of the works including to trees, shrubs, vegetation, verges, path surfaces, signage, fences, drainage and all and any other infrastructure will be made good, with a pre- and post-works condition assessment carried out by the applicant. NCC also seeks confirmation that any appropriate measures will be put in place to ensure the safety of users, and that signage will be installed to warn users of any disruption. This will ensure minimal impact on pedestrians and cyclists.	
Health		

Relevant Representation Number	Representation	Applicant Response
AS.002	The effect of the project on local residents' quality of life. Human health, especially effects on mental wellbeing.	The likely significant effects on human health (including physical activity; community identity, culture, resilience and influence; employment and income for vulnerable groups; climate change mitigation and adaption; electro-magnetic fields; wider societal infrastructure and resource; and health and social care services) are assessed in detail in Environmental Statement Chapter 16 Human Health [APP-045]. The Proposed Development has the potential to affect the way people feel about their community, through changes to the physical, economic, cultural or social landscape of the communities in the Local Study Area. During all three phases, there is the potential for a minor adverse (not significant) impact on community identity, culture, resilience and influence. The design of the Proposed Development has evolved in response to stakeholder feedback to embed sufficient mitigation into the proposals to avoid where possible visual changes to the landscape. This includes various setbacks to preserve key views and assets considered important by local communities, as well as offsets from individual properties.

Relevant Representation Number	Representation	Applicant Response
		Adverse mental health effects are likely to be most pronounced at the beginning of the phase and gradually reduce over time as the population becomes more accustomed to the changes, in parallel with the establishment of the biodiversity enhancement measures and planting to screen low-level views. The Applicant will facilitate continued open dialogue with local communities throughout the entirety of the operation and maintenance phase. A Community Liaison Officer will be appointed to lead discussions with local communities, and act as the primary point of contact should there be any queries or complaints. This can foster meaningful dialogue and improved outcomes for communities. Additionally, the beneficial effects of the Community Fund will continue to support community resilience within the Local Study Area and the Wider Study Area over the long-term.

Relevant Representation Number	Representation	Applicant Response
		During construction and decommissioning, there may be minor adverse (not significant) effect on physical activity due to the potential for disruption to PRoWs. Whilst all PRoWs will remain open during this phase, the construction works may discourage their use due to journey diversion or disruption, or due to adverse changes to amenity. The outline Construction Traffic Management Plan (oCTMP) [APP-181] sets out how construction traffic is managed and ensures that residents of the Local Study Area can continue to partake in physical activity using the PRoW network. During the Operational Phase, there will be new permissive paths available for use to travel between settlements to access social infrastructure or community facilities. Due to the low trip rates associated with the operation and maintenance of the Proposed Development, there would be no significant traffic impact to the road connections between settlements.

Relevant Representation Number	Representation	Applicant Response
RR.077	The Human Health chapter of the ES [APP-045] has developed for this stage of the application and has brought together all potential positive and adverse health effects successfully. The Council notes that the design has evolved through ongoing public engagement with the intention of alleviating anxiety. Offsets from individual properties and community assets are welcomed as it does appear that the solar arrays and associated fencing are further away from people's homes and better screened. However, the fields used for solar arrays are still close to North Carlton and still appear to encircle some small hamlets and individual properties, which may leave residents feeling enclosed.	The grid connection would supply energy directly to the National Grid, and then on to homes, businesses and other energy users across the UK. Therefore, the Proposed Development will not directly reduce energy costs in the local area, but would help contribute to reducing energy costs across the UK as the nation shifts away from using foreign fossil fuels which are costly and variable. However, the Applicant is proposing a community benefit fund which would directly contribute to the local community. This fund will be further developed through engagement with the community to help determine how to best support existing initiatives and priorities for the local community. This funding could be used to support nutrition programmes and expanded or improved recreation facilities.

Relevant Representation Number	Representation	Applicant Response
	The ES recognises that fuel poverty is higher in West Lindsey than the rest of the study area and England but there is then no direct benefits to residents impacted by the development (e.g., offsetting energy costs for residents targeted at households living in fuel poverty); instead the benefit is the longer term expectation that energy costs will fall given largescale renewal electricity production. Some land not used for panels has been redesignated for accessible green space and nature, which is positive, but more could potentially be made available for community growing (contributing to good diet and nutrition). From a mental health and physical health perspective, the Council is pleased to see that Public Rights of Way (PROWs) would be maintained through diversions during construction and decommissioning phases, and would be retained with green space enhancements, further connected through permissive paths (especially connecting Newton on Trent to Sustrans' national cycle route), during the operational period. There may be potential for improvements to be made such as hard surfaces to enable inclusivity and new bridges crossing streams.	Enhancement to the public right of way network is provided through the permissive paths proposed across the Order limits comprising 2.5km to the east of the River Trent and 3.6km to the west. The permissive paths have been designed to improve connectivity between communities and existing long distance routes, for example connecting Newton on Trent to the Sustrans route, enhancing access for pedestrians, cyclists, and equestrians. The proposed permissive paths also provide circular routes, such as on the west of the River Trent where a route is provided connecting Ragnall and Fledborough. The permissive paths have been designed to utilise existing field access points and watercourse crossings such than new crossings are not required.

Relevant Representation Number	Representation	Applicant Response
RR.077	It is appreciated that the applicant's consideration of Electromagnetic Fields (EMF) and assessment as not significant and note that EMF from the operation will be below exposure levels specified in health protection guidelines from the International Commission on NonIonizing Radiation Protection (ICNIRP). The Council cannot see that there has been further assessment and consideration of the adverse effect on older people with pacemakers fitted and would like assurance on this issue.	There are no recorded instances in the UK of harm resulting from power lines causing interference with active implanted medical devices. It is important to note that not all pacemakers are equally susceptible to EMFs, and the level of risk can vary depending on the specific device. ICNIRP guidance states "*restrictions are far lower than are required to cause adverse health effects to all people*." Additionally, no effects on the cardiovascular system have been substantiated for exposures with whole-body average SARs below ~4W/kg. (International EMF Exposure Guidelines) There are no residential properties within the Order Limits. The nearest properties are at least 5m from the Order Limits and it is unlikely that cables will be installed that close to any property due to the need for construction vehicles to manoeuvre both sides of the trench within the working width. Cables would be installed at a minimum of 10 m from the façade of any residential dwelling. It is considered that the level of exposure to users of PRoWs would be similar to that associated with general household appliances (and noticeably less than associated with the exposure when using a vacuum cleaner). Therefore, no significant effects to users of PRoWs are predicted to occur. ([APP-083]: Electromagnetic Fields Impact Report)

Relevant Representation Number	Representation	Applicant Response
RR.077	Overall, it is felt there is still more that needs to be done on mitigating the overall potential mental health effect on the local communities.	The likely significant effects on human health (including physical activity; community identity, culture, resilience and influence; employment and income for vulnerable groups; climate change mitigation and adaption; electro-magnetic fields; wider societal infrastructure and resource; and health and social care services) are assessed in detail in Environmental Statement Chapter 16 Human Health [APP-045]. This assessment identified no significant adverse effects on Human Health arising from the Proposed Development. Therefore the mitigations proposed are considered proportionate. These mitigations include: • Establishment of the biodiversity enhancement measures and planting to screen low-level views • New permissive paths available for use to travel between settlements to access social infrastructure or community facilities • Appointment of a Community Liaison Officer to lead discussions with local communities, and act as the primary point of contact should there be any queries or complaints • Approval of Detailed Construction Traffic Management Plan prior to commencement of authorised development.

Relevant Representation Number	Representation	Applicant Response
Heritage (Cultural)		
AS.002	In relation to the area in Bassetlaw, there are a range of heritage assets within close proximity to the proposal. There will be an impact of the project on the setting of built heritage assets and this will be discussed further in the local impact report. Cultural heritage, heritage and archaeology - especially the effect on listed buildings and community identity	The assessment of built heritage is set out in Table 10.6 within Chapter 10 Cultural Heritage [APP-039], and the supporting Cultural Heritage Desk-Based Assessment [APP-127; APP-128]. The scope of this assessment was agreed upon by relevant statutory consultees during the pre-application process (as set out in Table 10.5 of Chapter 10 [APP-039]).

Relevant Representation Number	Representation	Applicant Response
RR.032	WLDC notes that the Royal Observer Corps Roman Fort Scheduled Monument is located near to the OESF Order Limits. There is a statutory duty upon the decision makers to have regard to the impacts of the development upon Scheduled Monuments. Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 requires decision makers, when deciding applications for development consent which affects or is likely to affect a scheduled monument or its setting, to have regard to the desirability of preserving the scheduled monument or its setting. It is therefore clear that this statutory duty relates to the setting of scheduled monuments and not solely any direct physical harm. 2.30. WLDC note the applicant's assessment regarding the impact of the project upon the Scheduled Monument. WLDC considers that any adverse impact must be given due negative weight in carrying out the duty imposed by Regulation 3 and when considering compliance with the relevant National Policy Statements.	The effect on the value (significance), including the contribution of setting to value, of the Roman Vexillation Fortress, and a Royal Observer Corps Monitoring Post (Scheduled Monument) has been assessed within Chapter 10 Cultural Heritage [APP-039] and the supporting Technical Appendix [APP-127; APP-128]. As detailed within paragraphs 10.6.81 – 10.6.85 of Chapter 10 [APP-039], the Proposed Development is at a distance of c.880 metres from the asset at its southern boundary. Pages 54-55 of Built Heritage Technical Appendices [APP-128] summarises the value of this heritage asset, including the contribution to setting. Paragraph 10.6.85 of Chapter 10 Cultural Heritage [APP-039] establishes that the operational phase of the Proposed Development would result in a minor neutral effect overall, and there would be no harm to the value of the asset arising from changes in its setting. Therefore, the value of the scheduled monument would be preserved in line with Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 (and NPS EN-1 para 5.9.9 – 5.9.10)

Relevant Representation Number	Representation	Applicant Response
RR.135	Assessment of significance There are twelve Heritage Assets that have been identified as significant and that will be impacted by the proposed One Earth solar farm within the NSDC area. The Nottinghamshire County Council Historic Environment Record (HER) was used to cross reference the map provided to make this assessment. This is slightly more than the nine that have been identified on the map provided. In general, the most numerous area with listed buildings is the South Clifton settlement. North Clifton and Thorney both have fewer heritage assets, but two assets have been noted as more significant with a listing status of Grade II*. Two grade II* Churches have been identified as the most significant assets that lie adjacent to the proposed solar farm. The number of non-designated heritage assets increase the level of significance accordingly following roughly the numbers of listed buildings. These comments will focus on listed assets with one monument as this is where the higher level of significance has been identified. South Clifton is the only area with a Conservation Area and a large historic core compared to other settlements where heritage assets have been identified.	The scope of the assessment and methodology of assessment was agreed with all stakeholders, including Newark and Sherwood District Council, during the pre-application process through the Scoping Opinion and follow up consultation meetings with officers. The confirmation of agreement is recorded in Table 10.5 of Chapter 10 [APP-039]. For clarity, the quoted phrasing "significance heavily linked and similarity of potential effects" is located within the tabulated introduction pages [14-19] of the Technical Appendix [APP-128]. The purpose and context of this text is the grouping of assets for assessment later in the report and in the ES; this approach was agreed with all relevant stakeholders during the pre-application process, in line with Historic England guidance on setting ['GPA3', paragraph 22 – 23, page 9]. This phrasing is not assessing the value (significance) or effects, nor does it imply that the Proposed Development would affect these assets. The assessment of effects occurs on proceeding pages within the Cultural Heritage Desk-Based Assessment [APP-128] and Chapter 10 [APP-039].

Relevant Representation Number	Representation	Applicant Response
	Impact There are twelve assets that have been identified (as indicated below), these have been identified as being near the Order Limits boundary. Two of these assets are also a Grade II* Churches, the other ten are all Grade II listed. The assets that have been identified as most impacted by the solar farm are listed below in order most impacted to least. One monument has also been identified. 1. Church of St George (1046053) – Grade II* (Near North Clifton) 2. Church of St Helen (1302452(- Grade II* (Thorney) Note: This was not identified on map as Grade II* 3. Ruins of Old Church in Churchyard (1178446) – Grade II 4. Lychgate at Church of St George (1068081)– Grade II (Near North Clifton) 5. Fledborough Viaduct (Fledborough and North Clifton) Victorian to late 20th Century (Monument) 6. Firs Farmhouse (1302430) – Grade II 7. Hall Farmhouse (1302529) – Grade II (North Clifton) 8. Trent Lane Farmhouse (1369937) – Grade II (North Clifton) 9. The Old Manor House (1046018) – Grade II (Thorney)	

Relevant Representation Number	Representation	Applicant Response
	10. Thorney War Memorial (Gates) (1462827) – Grade II (Thorney) 11. Cottage at Thorney Hall (1369961) – Grade II (Thorney) 12. House at Thorney Hall (1046017_ Grade II (Thorney) With close reference to section 212 of the National Planning Policy Framework (NPPF), considering potential impacts, it is noted that greater weight to the asset should be given the higher the listing status and its conservation irrespective of level of harm. The phrasing which has been applied to all heritage assets within the district states: 'Significance heavily linked and similarity of potential effects.' This statement reveals the strong impact and significance of the assets the proposed development will have on these heritage assets. The impact of the project is heavily linked to their significance.	

Relevant Representation Number	Representation	Applicant Response
RR.135	Assessment of impact on each heritage asset identified and mitigation measures 1. Church of St George (1046053) – Grade II* (Near North Clifton) Impact of proposal The Church has architectural and historical significance and dates to the 13th century. The topography of the area means the belfry is very exposed and visible from many vantage points. One vantage point that has not been identified within the assessment of significance is that of the viewpoint from the viaduct. This viaduct is higher than the surrounding ground level and is a cycle route. No photographs have been provided from the viaduct, with railings either side leaving an exposed and open view to the site with trees and shrubs scattered around the area. Recommended Mitigation The wider site has been identified within the assessment provided as not having a relationship with the Church. This has no discernible bearing on the impact and level of harm that would be incurred from the proposal. Consideration should be afforded to how the proposed development impacts on the setting of this important heritage asset	Church of St George the Martyr (Grade II*) The effects of the Proposed Development on the value (significance) of this asset, including the contribution of setting to value, is assessed in paragraphs 4.136 – 4.139, page 66 of Appendix 10.2 [APP-128] and paragraphs 10.6.9 and 10.6.98-100 of Chapter 10 [APP-039]. This includes an understanding of how views of the church tower and the relationship between the church and its parish. Partial sight of the asset is gained from open sections of the viaduct.

Relevant Representation Number	Representation	Applicant Response
	Church of St Helen (1302452(- Grade II* (Thorney) Note: This was not identified on map as Grade II* Impact of proposal The Victorian church from 1850 has special architectural interest with its mixed of period styles. The proposal is far more distant from the site, with a road, hedging and a field between the eastern edge. This lessens the impact on the setting of the asset considerably compared to The Church of St George. Recommended Mitigation Consider planting more trees and hedging to further screen views onto the site would further protect the setting of the heritage asset.	As noted with paragraph 4.139 of the submitted Cultural Heritage Desk-Based Assessment (Appendix 10.2 [APP-128]), the contribution made by the setting is the Church's functional role in serving the Parish of North and South Clifton. The viaduct is an elevated position which provides an incidental and filtered vantage point of the asset. The view is a result of the viaduct being constructed in the 19th century to support railway services to Lincoln. The view of the asset is not designed nor an associated view from which value (significance) of the historic parish church is found. Whilst it provides an understanding of the relationship between the church and the wider parish, until recent years it would have only been glimpsed from a moving train and prior to the construction of the viaduct the view would not have been available. As such, any contribution has to be considered proportionately. As guided by Historic England guidance on setting, 'GPA3' (p.7, including paragraph 14), not all views of an asset, particularly for tall structures such as church towers, will be of heritage value. To support the consideration of this asset, a panoramic view will be provided alongside this response, including an illustration of the approximate view-cone in relation to the Proposed Development ('Cultural Heritage – Additional Information') .

Relevant Representation Number	Representation	Applicant Response
		This demonstrates that whilst the proposed solar arrays are positioned at over 978m (east) distance from the asset and, as such, there is unlikely to be any discernible change to the baseline views towards the Church from viaduct. There would be no effect to the prominence of the church tower or the understanding of its relationship with the wider parish. Therefore, the value (significance) of this asset would be preserved and unaffected by the Proposed Development. Church of St Helen

Relevant Representation Number	Representation	Applicant Response
		The overview map has excluded the identification of the asset, but it is correctly assessed as a Grade II* asset within Page 84 of Cultural Heritage Desk-Based Assessment (Appendix 10.2 [APP-128]). This asset has been assessed in ES Chapter 10 [APP-039] at paragraphs 10.6.7 and 10.6.126 (grouped with other assets in Thorney, as agreed with stakeholders – see Table 10.5), and in paragraph 4.191 of the Cultural Heritage Desk-Based Assessment (Appendix 10.2 [APP-128]), which sets out that the Site holds no contribution to setting and value (significance). As confirmed by Zone of Theoretical Visibility mapping Figure 10.3 [APP-055], the Proposed Development would hold no visibility with heritage assets in Thorney due to the distance away and extensive existing screening. As such, there would be no effect on the understanding or appreciation of value (significance) of this asset and additional planting would not be required as there are no views to screen.

Relevant Representation Number	Representation	Applicant Response
RR.135	2. Ruins of Old Church in Churchyard (1178446) – Grade II Impact of proposal The ruins are unusual and distinct feature that further increase the significance of the setting near the Church of St. Helens. The impact would be limited due to their positioning as the Church of ST Helens shields any views. Recommended Mitigation Increase hedging and tree coverage to further protect any views.	As above, this asset has been assessed in ES Chapter 10 [APP-039] at paragraphs 10.6.7 and 10.6.126 and on page 85 of the Cultural Heritage Desk-Based Assessment at Appendix 10.2 [grouped with other assets in Thorney, as agreed with stakeholders – see Table 10.5 [APP-128]. Page 86 of the the Cultural Heritage Desk-Based Assessment [APP-128] provides a view towards the general direction of the Order Limits from Main Street. The photograph illustrates the distance from the Order Limits and intervening modern built form and vegetative screening. As confirmed by the Zones of Theoretical Visibility, there would be no impact to the value (significance) of this asset, further mitigation is not required as no harm can feasibly exist which requires screening
RR.135	3. Lychgate at Church of St George (1068081)– Grade II (Near North Clifton Impact of proposal This listing would not be as impacted as the Church of St George due to its location, but it still forms part of the wider setting, and therefore further increases the significance of the site and subsequent impact that the proposal would have on the wider setting. Recommended Mitigation None would be required for this heritage asset.	As confirmed within paragraph 10.6.98 – 10.6.100 of ES Chapter 10 [APP-039], the Proposed Development would stand nearly 1km from the Church Lychgate. The Zone of Theoretical visibility [Figure 10.3 [APP-055)] confirms no intervisibility of the Proposed Development. There would be no effect on the appreciation of the church, churchyard and lychgate, therefore this asset would not change the assessed effects (or lack thereof) on the Church of St George the Martyr (Grade II*).

Relevant Representation Number	Representation	Applicant Response
RR.135	4. Fledborough Viaduct (Fledborough and North Clifton) Victorian to late 20th Century (Monument) Impact of proposal The monument is a significant Victorian architectural monument and is closely sited to the Grade II* St George Church. The impact of solar panels either side would be detrimental to the wider setting of the viaduct. Recommended Mitigation The small parcel of land north should be removed with no panels near the viaduct to preserve the setting.	No solar arrays are to be located on either side of the viaduct as the land is not included within the Order Limits. It is unclear which northern small parcel is recommended for removal; to clarify the nearest Order Limit north of the Site is at c.660m, with the nearest northern parcels being reserved for landscape mitigation rather than solar arrays. As noted within paragraphs 10.6.68 – 10.6.71 of ES Chapter 10 [APP-039], the industrial historic interest of the asset is not reliant on views of a particular character of the landscape to understand its value. As seen within Views 25a at Figure 11.13.7a [AS-038] and 26a in Figure 11.13.8a [AS-038], the Proposed Development would be positioned in the background of the views out to the north and north east from the viaduct and not seen to be near the NDHA, nor affecting views of the NDHA. As such, the Proposed Development would hold a negligible neutral effect and result in no change to the contribution of the wider setting to asset's value. Therefore, no further mitigation would be required.

Relevant Representation Number	Representation	Applicant Response
RR.135	5. Firs Farmhouse (1302430) – Grade II Impact of proposal A small strip of the solar farm seems encroach towards the heritage asset. Recommended Mitigation The necessity of this narrow piece of the proposal seems unjustified unless this is an access road. If this the case, then no harm shall be incurred.	Figure 10.1 [APP-055] of Chapter 10 [APP-039] confirms that the Order Limits stand at c.930m to the west of this asset. There is no stretch of the Order Limits which stand within the vicinity of the asset and no harm will arise.
RR.135	6. Hall Farmhouse (1302529) – Grade II (North Clifton) Impact of proposal There may be possible views from this heritage asset, no pictures present this within the report. Recommended Mitigation Increase hedging and planting to further reduce any views of the new site.	As illustrated within Viewpoint 25a [Figure 11.13.7a, AS-038] and assessed at paragraph 10.6.96 of ES Chapter 10 [APP-039], the Order Limits would stand distant from the asset and hold no intervisibility. The solar arrays would be positioned over 400m north of the asset with intervening close-knit built form and topographical variances likely to prevent all views of the Order Limits from within the asset's informative setting. No harm is identified and therefore no further mitigation is required. Photos of this asset will be provided at Deadline 1 to support this assessment ('Cultural Heritage – Additional Information').
RR.135	7. Trent Lane Farmhouse (1369937) – Grade II (North Clifton) Impact of proposal Limited, possible views from the site but is surrounded by other structures. There will be views in nearby field. Recommended Mitigation Suggest increased hedging to the south of the heritage asset.	As shown within Viewpoint 25a in Figure 11.13.7a [AS-038] and assessed at paragraph 10.6.93 of ES Chapter 10 [APP-039], the Order Limits would stand at distance from the asset (over 280m to the north), would not backdrop views of this asset from the Viaduct and would hold no adverse effect on the appreciation of the asset as an agriculture farmhouse. No harm is identified and therefore no further mitigation is required.

Relevant Representation Number	Representation	Applicant Response
RR.135	8. The Old Manor House (1046018) – Grade II (Thorney) Impact of proposal Within a residential area, the property has a buffer zone formed by a street and another row of properties across it. Recommended Mitigation Suggest increased hedging to the south of the heritage asset.	This asset has been assessed in Chapter 10 [APP-039] at paragraphs 10.6.7 and 10.6.126 (grouped with other assets in Thorney, as agreed with stakeholders – see Table 10.5). Figure 10.3 [APP-055] confirms that there would be no intervisibility with the Order Limits. The Proposed Development would not affect the value (significance) of the asset and no further mitigation is required.
RR.135	9. Thorney War Memorial (Gates) (1462827) – Grade II (Thorney) Impact of proposal While slightly closer than the church, the gates are less significant. There is still ample space between this asset and the proposal, so impact would be limited. Recommended Mitigation Suggest increased hedging to the south of the heritage asset.	This asset has been assessed in ES Chapter 10 [APP-039] at paragraphs 10.6.7 and 10.6.126 (grouped with other assets in Thorney, as agreed with stakeholders – see Table 10.5). Figure 10.3 [APP-055] confirms that there would be no intervisibility with the Order Limits. The Proposed Development would not affect the value (significance) of the asset and no further mitigation is required.
RR.135	10. Cottage at Thorney Hall (1369961) – Grade II (Thorney) Impact of proposal The asset is near the eastern site, but behind the Grade II* St Helens Church meaning the impact is limited. Recommended Mitigation Suggest increased hedging to the south of the heritage asset.	This asset has been assessed in ES Chapter 10 [APP-039] at paragraphs 10.6.7 and 10.6.126 (grouped with other assets in Thorney, as agreed with stakeholders – see Table 10.5). Figure 10.3 [APP-055] confirms that there would be no intervisibility with the Order Limits. The Proposed Development would not affect the value (significance) of the asset and no further mitigation is required

Relevant Representation Number	Representation	Applicant Response
RR.135	11. House at Thorney Hall (10460170) – Grade II (Thorney) Impact of proposal The asset is near the eastern site, but behind the Grade II* St Helens Church meaning the impact is limited. Recommended Mitigation Suggest increased hedging to the south of the heritage asset.	This asset has been assessed in Chapter 10 [APP-039] at paragraphs 10.6.7 and 10.6.126 (grouped with other assets in Thorney, as agreed with stakeholders – see Table 10.5). Figure 10.3 [APP-055] confirms that there would be no intervisibility of the Proposed Development from assets in Thorney. The Proposed Development would not affect the value (significance) of the asset, and no further mitigation is required.
RR.135	Summary and Conclusions The potentially most impacted heritage assets are the Grade II* Church of St George and the viaduct (monument). Further information should be provided on the interaction between the proposed development and these assets. Whilst mitigation measures were noted, with paragraph 70 quoted within the report stating that trees and hedges would be utilised to reduce visual impact on heritage assets. Except for the Church of St George and the Viaduct, these measures would be appropriate for the other heritage assets that have been identified within these comments. They may also be appropriate for the Church of St George and the Viaduct, once further information has been provided on the impacts upon these assets.	Further information will be provided at Deadline 1 ('Cultural Heritage – Additional Information') to support the assessment that the Proposed Development would not be seen in views towards the Church of St George from the Viaduct. Confirmation of where the assets mentioned have been assessed within Chapter 10 [APP-039] and accompanying appendices has been provided to demonstrate that there would be no harmful effects to any of these assets and, as such, no further mitigation is required.

Relevant Representation Number	Representation	Applicant Response
RR.154	**Built Heritage** NCC has reviewed the information regarding the impact of the project on the setting of built heritage assets and the assessment of the severity and magnitude of these in each case, the submitted information is accurate. There is evidence of mitigation measures, including the creation of buffer areas and planting to restrict views of solar panels in some key areas, based on previous input from conservation officers. NCC remains concerned that there will be an overall harmful impact on the setting and hinterlands of some heritage assets and that the cumulative impacts alongside other nationally significant projects in the Trent Valley and immediate area are likely to be considerable.	The recognition of the accuracy of the submitted information and the mitigation measures is appreciated. Whilst the concerns of NCC are noted, to clarify, Chapter 10 [APP-039] only found a single long term significant adverse effect would arise: to the Whimpton Moor (Scheduled Monument) which is difficult to mitigate against as harm arising from perceptual changes in the setting, rather than visual changes. The Proposed Development was assessed to hold no long-term significant effects to any other assets within the agree scope. Where harm has been identified to a small number of designated assets within the scope of assessment, this would be at the mid – lower end of less than substantial harm.

RR.077	**Cultural Heritage** The Council is satisfied that our previous recommendations and concerns at the scoping stage in relation to built heritage and historic landscape have been addressed to an appropriate degree. In particular, the confirmation that cabling would cross the River Trent via trenchless crossing, avoiding the historic Fledborough Viaduct, and satisfactorily mitigates the potential for harm to this non-designated heritage asset and the associated national cycle route (Sustrans Route 647). Although the proposed development would inevitably alter the setting of the historic railway corridor as it crosses the site, the design incorporates sufficient mitigation —including setbacks and landscape planting — to retain the route's legibility and reduce harm to an acceptable level. With regard to Kettlethorpe Hall, its former parkland and Park Farm, the Council notes that while these assets have been considered through the assessment process, they are now being scoped out of further detailed assessment. Nonetheless, the wider historic context of the area has been recognised and measures to retain openness and maintain rural character along settlement edges are welcomed, responding positively to the issues previously raised. Overall, and noting that much of the scheme lies outside our	The Applicant welcomes the Council's confirmation that it is satisfied with the acceptability of the proposals and has no further comments.

Relevant Representation Number	Representation	Applicant Response
	jurisdiction, the Council is satisfied that the proposals are acceptable in terms of their approach to built heritage and the historic landscape and has no further comments to make for the purposes of the relevant representation.	
Heritage (Buried)		
RR.135	NSDC made comments on this topic area during the pre-application stage in response to the Applicant's Statutory Consultation. This advice was provided by Lincolnshire County Council as an advisor to NSDC. Notwithstanding this, at the post submission stage, we will leave this topic matter to Nottinghamshire County Council and Lincolnshire County Council as the appropriate technical statutory consultee to respond. NSDC make separate comments below on Chapter 10 – Cultural Heritage.	The Applicant acknowledges that NSDC will defer to Nottinghamshire County Council and Lincolnshire County Council as the appropriate statutory consultees on Buried Heritage matters.

RR.154	**Buried Heritage** Having reviewed the submitted documents, the Council continues to have concerns regarding the level of archaeological assessment undertaken to inform the applicant's DCO application. NCC acknowledges the applicant's assessment work to date, including a desk-based assessment (DBA), geophysical survey (magnetometry) and some targeted evaluation trenching. The concern is primarily focused on the level of evaluation trenching which currently provides a limited data set for identifying the presence, depth, date, character, location, state of preservation and significance of archaeology recorded in both the DBA and geophysical surveys. It also fails to adequately test areas where these previous techniques have not been successful in identifying archaeological remains. While some of these concerns can be addressed through a robust programme of investigation work post-consent, we would expect that at the application/examination stage, the applicant at least would have evaluated those areas that they themselves have identified as have having significant archaeological potential.	The extent and scope of the targeted trial trenching evaluation is considered proportionate and appropriate, striking the right balance between providing the required evidence to inform the DCO application and limiting the impact on Buried Heritage Assets arising from any intrusive archaeological work. The Applicant considers that information submitted meets the requirements of the NPPF, NPS EN-1 and NPS EN-3, and provides an adequate baseline for the assessment of impacts including the potential for currently unknown archaeological remains. The trial trenching evaluation carried out to date has provided the required information to define nature, extent, preservation and significance that will inform the archaeological mitigation strategy for the Proposed Development. This includes assessing the Project Design's capacity to address and accommodate any archaeological constraints that have been, or may in the future be, identified. This process also provided a better understanding of the buried heritage assets and demonstrated the substantial reliability of the non-intrusive assessments and evaluation carried out to inform the targeted trial trenching evaluation. Where trial trenching evaluation was not undertaken in certain areas of the Order Limits it is not regarded as a limitation to the assessment. The impacts and any additional mitigation requirements in these areas can be adequately understood based on the data presented in the DBA and the results of the completed geophysical survey evaluation which, alongside the results of the trial trench evaluation of other areas, provide a robust basis for understanding the impacts and mitigation requirements of the Order Limits as a whole.

	In Nottinghamshire, the applicant's own DBA and geophysical survey combined have highlighted 29 areas of archaeological potential, however only 9 of those have been subject to evaluation trenching and consequently the nature, extent and significance of 20 identified areas remains unknown. This leads us to a lack of confidence in the applicant's assessment process and understanding of the significance of the archaeological resource and their developmental impacts upon it. The applicant does suggest that they will provide for a programme of post-consent investigation work as well as outline mitigation which is welcomed. However, further detail on this has not been provided in the application. The inadequate approach to assessment has resulted in a vague and uninformed proposal for mitigation work. The applicant seeks to delay all decisions on the nature and extent of mitigation work to post-consent, even for the areas that have received sufficient evaluation. This opens the scheme to significant risk in terms of deliverability as proposed and may lead to unnecessary delays, cost increases and unfavourable outcomes for the buried heritage within the Order Limits. The Council also maintains that the applicant's submission for buried heritage lacks consistency and	The forthcoming Outline Written Scheme of Investigations (oWSI) will define the strategy to carry out additional trial trenching evaluation to evaluate the remaining 20 areas of archaeological potential identified in the DBA and by the geophysical survey. This will also inform the detailed design and mitigation for archaeological remains and this can be secured through draft DCO Requirements 12 [APP-007]. Mitigation for archaeological remains will either be through design changes to avoid impacts (micro siting / exclusion zones or use of non-intrusive foundations) or through excavation or archaeological monitoring where avoidance is not necessary or desirable. Carrying out any further trial trenching evaluation as a pre-commencement requirement, will reduce the risk of any disproportionate harm to buried heritage deposits arising from a partial or total removal of assets as a consequence of the archaeological trial trenching investigation, to not be offset by the positive environmental effects of the Proposed Development. In consideration of the following: ➢ CifA's Code of Conduct Principle 2 stating that "*the member has a responsibility for the conservation of the historic environment*," and Rules 2.1 stating that "*A member shall strive to conserve archaeological sites and material as a resource for study and enjoyment now and in the future, and shall encourage others to do the same. Where such conservation is not possible, they shall seek to ensure the creation and maintenance of an adequate record through appropriate forms of research, recording, archiving of records and other relevant material, and dissemination of results*", and

Relevant Representation Number	Representation	Applicant Response
	necessary detail in some areas, and we will provide more detailed comments on all of this in the LIR.	Rule 2.3 stating that "*A member shall ensure that the objects of a research project are an adequate justification for the destruction of the archaeological evidence which it will entail*." ➢ Paragraph 5.9.11 of the Overarching National Policy Statement for Energy (EN-1, 2024), stating that "*Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact*." ➢ Paragraph 5.9.21 of the EN-1 stating that "*Where there is a high probability (based on an adequate assessment) that a development site may include, as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction*."

Relevant Representation Number	Representation	Applicant Response
		➢ Paragraph 2.3.8 of the National Policy Statement for Renewable Energy Infrastructure (EN-3) stating that "In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target." The phased approach to assessment, utilising a suite of techniques to build upon and inform one another, is comparable with other DCO solar farm schemes. Large amounts of predetermination trenching are not supported by guidance or by the ethical principle of minimizing harm to the historic environment. In their reply, Historic England support an approach that minimizes unnecessary physical interventions to archaeological remains.

RR.077	Having reviewed the submitted documents, the Council continues to have concerns regarding the level of archaeological assessment undertaken to inform the applicants DCO application. The Council acknowledges the applicant's assessment work to date, including a desk-based assessment (DBA), geophysical survey (magnetometry) and some targeted evaluation trenching. The concern is primarily focused on the level of evaluation trenching which currently provides a limited data set for identifying the presence, depth, date, character, location, state of preservation and significance of archaeology recorded in both the Desk Based Assessment (DBA) and geophysical surveys. It also fails to adequately test areas where these previous techniques have not been successful in identifying archaeological remains. While some of these concerns can be addressed through a robust programme of investigation work post-consent, the Council would expect that at the application/examination stage, the applicant at least would have evaluated those areas that they themselves have identified as having significant archaeological potential. The applicant's own DBA and geophysical survey combined have highlighted 29 areas of archaeological potential, however only 9 of those have been subject to evaluation trenching and consequently the nature, extent and significance of 20	The extent and scope of the targeted trial trenching evaluation is considered proportionate and appropriate, striking the right balance between providing the required evidence to inform the DCO application and limiting the impact on Buried Heritage Assets arising from any intrusive archaeological work. The Applicant considers that information submitted meets the requirements of the NPPF, NPS EN-1 and NPS EN-3, and provides an adequate baseline for the assessment of impacts including the potential for currently unknown archaeological remains. The trial trenching evaluation carried out to date has provided the required information to define nature, extent, preservation and significance that will inform the archaeological mitigation strategy for the Proposed Development. This includes assessing the Project Design's capacity to address and accommodate any archaeological constraints that have been, or may in the future be, identified. This process also provided a better understanding of the buried heritage assets and demonstrated the substantial reliability of the non-intrusive assessments and evaluation carried out to inform the targeted trial trenching evaluation. Where trial trenching evaluation was not undertaken in certain areas of the Order Limits it is not regarded as a limitation to the assessment. The impacts and any additional mitigation requirements in these areas can be adequately understood based on the data presented in the DBA and the results of the completed geophysical survey evaluation which, alongside the results of the trial trench evaluation of other areas, provide a robust basis for understanding the impacts and mitigation requirements of the Order Limits as a whole.

Relevant Representation Number	Representation	Applicant Response
	identified areas remains unknown. The Council therefore has a lack of confidence in the applicant's assessment process and understanding of the significance of the archaeological resource and their developmental impacts upon this resource. The applicant does suggest that they will provide for a programme of post-consent investigation work as well as outline mitigation which is welcomed. However, further detail on this has not been provided in the application. The inadequate approach to assessment has resulted in a vague and uninformed proposal for mitigation work. The applicant seeks to delay all decisions on the nature and extent of mitigation work to post-consent, even for the areas that have received sufficient evaluation. This opens the scheme to significant risk in terms of deliverability as proposed and may lead to unnecessary delays, cost increases and unfavourable outcomes for the buried heritage within the Order Limits. The Council maintains that the applicant's submission for buried heritage lacks consistency and necessary detail in some areas and will provide more detailed comments on all of this for the LIR.	The forthcoming Outline Written Scheme of Investigations (oWSI) will define the strategy to carry out additional trial trenching evaluation to evaluate the remaining 20 areas of archaeological potential identified in the DBA and by the geophysical survey. This will also inform the detailed design and mitigation for archaeological remains and this can be secured through draft DCO Requirements 12 [APP-007]. Mitigation for archaeological remains will either be through design changes to avoid impacts (micro siting / exclusion zones or use of non-intrusive foundations) or through excavation or archaeological monitoring where avoidance is not necessary or desirable. Carrying out any further trial trenching evaluation as a pre-commencement requirement, will reduce the risk of any disproportionate harm to buried heritage deposits arising from a partial or total removal of assets as a consequence of the archaeological trial trenching investigation, to not be offset by the positive environmental effects of the Proposed Development. In consideration of the following:

Relevant Representation Number	Representation	Applicant Response
		➢ CifA's Code of Conduct Principle 2 stating that "*the member has a responsibility for the conservation of the historic environment*," and Rules 2.1 stating that "*A member shall strive to conserve archaeological sites and material as a resource for study and enjoyment now and in the future, and shall encourage others to do the same. Where such conservation is not possible, they shall seek to ensure the creation and maintenance of an adequate record through appropriate forms of research, recording, archiving of records and other relevant material, and dissemination of results*", and Rule 2.3 stating that "*A member shall ensure that the objects of a research project are an adequate justification for the destruction of the archaeological evidence which it will entail*." ➢ Paragraph 5.9.11 of the Overarching National Policy Statement for Energy (EN-1, 2024), stating that "*Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact*."

Relevant Representation Number	Representation	Applicant Response
		➢ Paragraph 5.9.21 of the EN-1 stating that "*Where there is a high probability (based on an adequate assessment) that a development site may include, as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction*." ➢ Paragraph 2.3.8 of the National Policy Statement for Renewable Energy Infrastructure (EN-3) stating that "In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target." The phased approach to assessment, utilising a suite of techniques to build upon and inform one another, is comparable with other DCO solar farm schemes. Large amounts of predetermination trenching are not supported by guidance or by the ethical principle of minimizing harm to the historic environment. In their reply, Historic England support an approach that minimizes unnecessary physical interventions to archaeological remains.

Relevant Representation Number	Representation	Applicant Response
Hydrology & Hydrogeology		
AS.002	The following comments have been received from Dunham and District Parish Council. Dunham and District Parish Council have concerns about the project as a whole, and are particularly concerned about the following areas that will affect residents of the parishes: ... Hydrology, flooding, and water management	The potential impacts on hydrology and hydrogeology have been assessed in Chapter 7 [AS-053.]. A Flood Risk Assessment (FRA) has also been completed [AS-051]. Chapter 7 concludes that with environmental measures incorporated, there will be no significant environmental effects relating to hydrology and hydrogeology as a result of the Proposed Development. The FRA concludes that the Proposed Development would not increase flood risk at the Site or in the surrounding area, and would remain operational and safe during times of flood.

Relevant Representation Number	Representation	Applicant Response
RR.135	NSDC note that the Environment Agency are the key statutory consultee in respect of this topic area and are therefore best placed to offer commentary on this technical topic area. Notwithstanding this, NSDC note that the Chapter has provided clarity on a point we raised at statutory consultation stage in respect of the study area, which has been defined as 1km and based on the Design Manual for Roads and Bridges (DMRB). In respect of this point, we are aware that there is concern in the local community regarding the interaction between the Proposed Development and the Water Treatment Plant that lies within proximity of the Order Limits and the potential for pollution but note that this is a matter upon which the Environment Agency are best placed to advise upon as the appropriate statutory technical consultee. Consideration of water quality impacts and the Torskey drinking water catchment.	Although not referred to in the representation, it is assumed that the Water Treatment Plant in question is the Anglian Water "Hall Water Treatment Works" located to the east of the River Trent. For clarity, this is located within Flood Zone 1 (indicating a low probability of flooding from fluvial sources) and is outside of the design flood extent. The potential for flood interactions between the treatment works and the Proposed Development and the potential therefore for any mobilised contaminants to reach the treatment works is therefore very low. For clarity, in addition to the treatment works, the following are present within the Order limits or within the vicinity: • A Secondary aquifer across the majority of study area. • A Drinking Water Protected Area for Surface Water across the eastern area and portions of the western area. • Groundwater Source Protection Zones to the north, outside of the order limits.

Relevant Representation on Number	Representation	Applicant Response
		The above receptors could in theory be impacted by pollutants in surface water runoff or by pollutants that are mobilised during a flood event. However, mitigation measures are proposed to minimise this potential. This includes the following: • Although there are Source Protection Zones, drinking water protected areas for surface water and groundwater abstraction points located within Flood Zones 2 and 3, there are mitigation measures contained within the oCEMP (APP-176), oOEMP (APP-177) and oDEMP (APP-178), that are protective of water as a whole and will have the effect of protecting any groundwater or surface water that is abstracted. These measures include: o the safe storage of materials; o use of containment measures for fuels and oils; o emergency spillage plans; o designated areas for mixing and handling materials; o management of site runoff; and

Relevant Representation Number	Representation	Applicant Response
		○ protocols for if suspected contaminated material is encountered. The mitigation measures that protect groundwater and surface water will ensure that there is no significant deterioration in quality of water resources during the lifetime of the Proposed Development. With regards to potentially polluted surface water runoff from the operational site, a drainage strategy to manage runoff from the battery storage and sub-station areas has been set out within Section 4 of the FRA (AS-051) and includes the following measures: • Detention basins have been sized to accommodate the 100 year plus 40% climate change storm event and have been located outside of the design flood risk extent, minimising the potential for mobilisation of contaminants. • There will be no infiltration of surface water runoff from the battery storage/sub-station areas as an impermeable lining is included to prevent infiltration and potential contamination to groundwater.

Relevant Representation Number	Representation	Applicant Response
		• Suitable SuDS features, including permeable surfacing and detention basins are included for treatment of runoff from bess and substation areas prior to discharge to any watercourses. • Fire suppression has been considered and should this occur, a penstock valve downstream of the basin will be automatically triggered to isolate potentially contaminated discharges and prevent discharge to surrounding watercourses. Should this occur, contaminated water would be tankered away and treated accordingly off-site. • Furthermore, the potential for a fire to occur at the same time as a rainfall event has been considered and the basins have therefore been sized to provide sufficient storage to attenuate the 1 in 10 year event plus 228m3 of firewater (based on firefighting at 1,900 l/minute for 2 hours), with no discharge.

Relevant Representation Number	Representation	Applicant Response
RR.154	NCC refers to the comments that it supplied during the pre-application stage: The approach to assessment appears to appropriately consider flood risk and follow all the relevant policy and legislative guidelines and appropriately consider flood risk and drainage at this stage. Due to the nature of the proposals these do not appear to seek to significantly increase the impermeable area of the site, and as such NCC would only comment that surface water runoff from the site should not be exacerbated. Any increased runoff from the site, such as from any hardstanding/small buildings, should be appropriately managed on site to prevent increasing runoff from the site and therefore prevent increasing the risk of flooding the surrounding area of the site. NCC is in the process of reviewing the submitted Environment Statement and Flood Risk Assessment and is engaging further capacity to consider the application in detail. NCC will comment further in its Local Impact Report.	In line with research undertaken by Cook L.M. and McCuen R.H (2013, Hydrologic response of Solar Farms. Journal of Hydrologic Engineering 18: pp 536-541), solar farms are not considered to result in significant increases in runoff when compared to the existing greenfield situation. This is on the basis that runoff from the panels themselves will simply drop directly to the vegetated ground beneath where the natural regime will be maintained. However, measures including inspection and maintenance of vegetation cover are proposed to ensure that the impact remains negligible. In addition, it is proposed that strategic Sustainable Drainage Systems (SuDS) such as filter drains, swales and basins/scrapes are incorporated within the solar array areas to encourage infiltration to the ground and also provide ecological and biodiversity benefits. The sub-stations and battery storage areas represent more significant hardstanding where surface water runoff would be generated rather than simply infiltrating to the ground. With this in mind, a more traditional drainage assessment has been undertaken for these areas where runoff is to be restricted to the greenfield runoff rate (Q_{bar}) for all events up to and including the 1 in 100 year plus climate change scenario thereby ensuring there is no increase in flood risk due to surface water runoff.

Relevant Representation Number	Representation	Applicant Response
		The FRA APP-095] sets this out in further detail and confirms the Proposed Development would not increase flood risk at the Site or surrounding area.

Relevant Representation Number	Representation	Applicant Response
RR.077	Hydrology and Hydrogeology The Council in its capacity as Lead Local Flood Authority (LLFA) has reviewed the application documents for this proposal. In terms of flood risk and drainage, the LLFA considers for the main solar farm, the Surface Water Flood Risk is appropriately addressed in 7.5.15 [APP036]. The eastern BESS is located in Lincolnshire and the proposed surface water drainage is outlined satisfactorily in Appendix 7.2: Flood Risk Assessment and Outline Drainage Strategy [APP-095] with the Surface Water Drainage Strategy Plans (A7) showing impermeable areas for BESS and access roads used in the assessment, along with required attenuation volumes and areas. The proposals are acceptable in terms of impacts on surface water flood risk with written details of the drainage and surface water management plan (to include, details of any foul water drainage) to be submitted to and approved by the Council currently Requirement 12 of the draft DCO	Noted.

Relevant Representation Number	Representation	Applicant Response
Land & Soils		
RR.077	Minerals and Waste It is noted that a Minerals Safeguarding Assessment is included in the DCO application [APP175] and includes an assessment of the Minerals Safeguarding Area (MSA) for sand and gravel, as shown in Figure 1: Lincolnshire Minerals Safeguarding Areas map of the Lincolnshire Mineral and Waste Local Plan (LMWLP), and the Newton on Trent Oil Well which is within the study area but outside the Order limits. The Council has no further comments on Minerals Safeguarding at this stage. If there is need for further update this will be included in the LIR. Whilst waste has been scoped out of the ES as a separate chapter, the inclusion of an outline Site Waste Management Plan (oSWMP) [APP-184] and Appendix 2.3 Materials and Waste Impact Assessment [APP-082) is welcomed.	No response required at this stage. Further consideration is expected in LIR, which will then be discussed as requested.

Relevant Representation Number	Representation	Applicant Response
	The applicant has committed to achieve 100% reuse and recycling of solar panels (Appendix 2.3 Materials and Waste Impact Assessment [APP-082] paragraph 1.4.2) The Council will have some points of detail in relation to the lack of current capacity and waste management for recycling solar panels, with regard to operational failures and repowering, but more particularly at the decommissioning stage due to cumulative impacts with other proposed NSIP scale solar farms. These will be picked up in the LIR and through discussions with the applicant.	
AS.002	The site may have a history of contaminative land use, raising concerns about existing land contamination. A thorough investigation into the extent of contamination, including soil and groundwater testing, may be necessary. Appropriate remediation plans must be developed to ensure the site is safe for its intended use.	The Applicant is aware of the potential for the presence of contamination due to historical site usage. The Preliminary Risk Assessment report (presented as **Appendix 8.2 [APP-099 to APP-104]**) undertook a review of available desk-based information to assess this issue, which follows industry guidelines (including the technical approach presented in Land Contamination Risk Management (LCRM) (Environment Agency, 2021)

Relevant Representation Number	Representation	Applicant Response
	Risk of Future Land Contamination: The proposed development activities may introduce new contaminants into the environment. An evaluation of potential contamination sources and robust strategies to prevent future contamination should be an integral part of the EIA. More detailed study of the full submission will be included within the Council's LIR.	and in general accordance with BS 10175: 2011 + A2 2017 (BSI, 2017)), and included looking at historical maps, recorded pollution events, the locations of historical or current waste sites. A site walkover was also undertaken to further assess these issues. The Preliminary Risk Assessment report (**Appendix 8.2 [APP-099 to APP-104]**) used the collated baseline data to determine potential contaminant linkages that may be present at the site, and to present methods for further assessing these linkages to determine the level of risk associated with them. The Preliminary Risk Assessment report (**Appendix 8.2 [APP-099 to APP-104]**) concluded that a Phase 2 intrusive ground investigation should be undertaken to allow any potential risks to be further assessed, to include, but not necessarily be limited to, the following: • soil and groundwater sampling (locations to be based on the findings of the PRA, and in line with industry best practice), with appropriate environmental laboratory analysis (suites to be selected based on the findings of the PRA, and any additional observations during intrusive work) • ground gas monitoring in monitoring wells located in proximity to historical landfill sites.

Relevant Representation Number	Representation	Applicant Response
		Further to the phase of intrusive investigation, an interpretative report will be prepared to identify where potential contaminant linkages have been demonstrated to be present or absent. Mitigation measures or remedial actions will be recommended in the interpretive report. The details and scope of any such works will then be agreed with the regulatory consultees (the local authorities, and the Environment Agency, as appropriate), to ensure that any issues relating to contamination are fully resolved prior to any construction works commencing. Subsequent to the Preliminary Risk Assessment report (**Appendix 8.2 [APP-099 to APP-104]**), which focusses on the potential for the project to encounter contamination, **Chapter 8: Land, Soils and Groundwater [APP-037]** was prepared, which focusses on the potential for the project to adversely affect existing receptors associated with land and groundwater. This assessment used the baseline data presented in the Preliminary Risk Assessment report (**Appendix 8.2 [APP-099 to APP-104]**), and considered the activities involved in the construction, operation and decommissioning phases of the proposed development to determine which actions required mitigation to be employed to ensure that adverse impacts to sensitive receptors do not result.

Relevant Representation Number	Representation	Applicant Response
		Chapter 8: Land and Soils a [APP-037] concluded that the application of mitigation measures would ensure that no significant effects would occur in relation to land and groundwater receptors. An evaluation of potential contamination sources (either due to existing contamination or pollution accidentally introduced by the Proposed Development) is presented in **Chapter 8: Land and Soils a [APP-037]**, and the mitigation presented in the management plans for the development phases presents robust strategies to prevent future contamination. Mitigation measures such as the following are included in the **OCEMP [APP-176], OOEMP [APP-177] and ODEMP [APP-178]**: • ground investigation works will be undertaken prior to commencing construction. Results will be reviewed by the appointed contractor(s), including any additional investigation or mitigation measures beyond the impact avoidance measures stated in the management plans;

Relevant Representation Number	Representation	Applicant Response
		• Should any potentially contaminated ground, including isolated 'hotspots' of contamination and/or potential deposits of asbestos containing materials (ACM), be encountered, the contractor(s) will be required to investigate the areas and assess the need for containment or disposal of the material. The contractor(s) will also be required to assess whether any additional health and safety measures are required; • Containment measures will be implemented, including drip trays, bunding or double- skinned tanks of fuels and oils; all chemicals would be stored in accordance with their COSHH guidelines, whilst spill kits would be provided in areas of fuel/oil storage; • An emergency spillage action plan will be produced, which staff would have read and understood, and provisions made to contain any leak/spill; • Piling design and construction works will be completed following the preparation of a piling risk assessment; and • The proposed drainage strategies for the BESS compound areas include penstock valves at the outlets to ensure that any runoff generated during a polluting event (e.g. fire) would be isolated and removed from the Site.

RR.135	In respect of Chapter 8, NSDC have reviewed the Preliminary Risk Assessment (PRA) report as contained in Appendix 8.2 of the ES. This includes an environmental screening report, an assessment of potential contaminant sources, a brief history of the site's previous and current uses and a description of the site walkover. Due to the scale of the development, not all site areas have been visited as part of the site walkover and there are therefore some assumptions made regarding the risk at some unvisited locations. However, given the proposed use of the site is very low sensitivity in relation to human health risk, NSDC have no significant concerns with the findings of the report in respect of receptors within the Newark and Sherwood area. We would expect all site construction workers and future maintenance workers to adhere to Health and Safety legislation and to wear appropriate PPE in order to minimise the risk of exposure to any unexpected contamination. Finally, NSDC note that the report concludes with a recommendation for a scope of intrusive sampling and ground gas monitoring at the former High Marnham power station site. Whilst we would concur with this recommendation based on the PRA, this	The Applicant notes the comments provided in the Relevant Representation. Please be aware that although it is acknowledged that the size of the Site meant that not all areas were visited during the site walkover, the completion of the desk-based assessment prior to attending the Site meant that any areas that were more likely to be the locations of contaminative land uses were prioritised as part of the walkover. For example, the location of the former High Marnham Power Station, and locations where former mineral extraction sites were noted on historical mapping were visited as far as practicable. Site construction workers and maintenance workers will be required to where appropriate best practice PPE under the measures listed in the OCEMP [APP-176], OOEMP [APP-177] and ODEMP [APP-178]. Final measures will be agreed upon with the council before the final CEMP. OEMP and DEMP, are submitted, as per Requirements within the Draft DCO [APP-007].

Relevant Representation Number	Representation	Applicant Response
	location is outside of the NSDC administrative area and as such, the authority holds no records in this regard. We would expect Bassetlaw District Council to therefore provide advice in this regard.	
RR.135	Turning to the issue of Agricultural land classification, NSDC have received advice from its externally appointed advisors on the technical elements of the soil survey investigative work (in respect of the Best and Most Versatile Agricultural Land) and in this regard wish to make the following key observations. • A detailed baseline Agricultural Land Classification Survey (ALC) has been undertaken (as presented within Appendix 8,3 of the ES), in conjunction with Natural England consultation, it covers the whole Order Limit area of 1400 hectares and in detail at a standard density of 1 auger bore per hectare.	ALC Report has been completed and is in line with industry standards and accepted by Natural England as presented within Appendix 8.3 of the ES [APP-105].

Relevant Representation Number	Representation	Applicant Response
RR.135	• The ALC work has been undertaken by a specialist firm using conventional auger techniques.	ALC Report has been completed and is in line with industry standards and accepted by Natural England as presented within Appendix 8.3 of the ES [APP-105].
RR.135	• The ALC report has identified agricultural land of Grade 2, Subgrade 3a and Subgrade 3b quality. The findings confirm that 53.3% (660 Hectares) of the site is BMV quality, based on detailed surveys.	ALC Report has been completed and is in line with industry standards and accepted by Natural England as presented within Appendix 8.3 of the ES [APP-105].
RR.135	• An outline Soil Management Plan has also been prepared to include construction, management, and decommissioning stages of the proposal. The final version should be prepared in line with national guidance as set out in Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Site (the Soil Code).	The SMP will be in line with Defra's Code of Practice as well as other industry guides such as Institute of Quarrying Good Practice Guide for Soil Handling.
RR.135	• With identified land drainage issues on site, the Soil Management Plan does address some of the concerns associated with land drainage. This will be particularly important along the cable routes.	Land drainage has been considered within the oSMP [APP182] and will be mitigated.

Relevant Representation Number	Representation	Applicant Response
RR.135	• At the moment the cable routes have not been surveyed in detail, but once clearly identified this should be subject to further consideration.	A detailed survey will be conducted within the survey area prior to construction once the design is finalised.

RR.135	• Although not mentioned specifically there may be justification for a soil health assessment and input to loss of land for food production and the impact on any agricultural holdings affected, particularly given the proposed development would have an operational lifespan of 60 years. As such, NSDC note that a total of 53% of BMV land will be impacted by the proposed development, of which 20% is classified as Grade 2 Land. Whilst the Applicant notes that this is for a temporary period (as also referred to below in respect of cumulative impacts) the proposed development has a longer than average operational lifespan of 60 years for a solar farm and NSDC are very concerned about the impacts on BMV land. Referring back to our earlier comments on alternatives, NSDC suggest that the Applicant demonstrate how other areas of land have been considered that may have involved a lower degree of BMV land. NSDC particularly take the view that loss of Grade 2 (Very Good Agricultural Land) land should be avoided. As such, NSDC consider that only Grade 3a and Grade 3b (or lower grade quality) should be utilised, on the basis of the long-term loss of such valuable land for food production purposes.	Soil quality is not expected to decrease during the operation of the solar farm, as the land will not be subjected to conventional agricultural practices such as heavy farm machinery use, pesticide or herbicide application, or tillage. In the absence of these disturbances, the soil structure remains intact and undisturbed, allowing natural processes to continue. Nutrients can be returned to the soil through controlled grazing. Moreover, because the soil is not being regularly turned, organic matter can accumulate at the surface and within the soil profile, promoting increased carbon sequestration and water infiltration. Land that will be returned back to agricultural use following decommissioning will be returned to the prior ALC grade following measures and mitigation outlined in the oSMP [APP-182]. Therefore, as the land is being returned back to the pre-construction condition in line with EN-1 paragraphs 2.10.66 and 2.10.77 the development will be classed as temporary for all areas except green infrastructure. During the operation phase soil quality is able to be improved from nutrient inputs as a result of grazing and reduced agricultural pressure through heavy machinery, ploughing, fertilisers, herbicides and pesticides. During decommissioning the impact on soils has been mitigated through industry standard practice such as using track matting, avoiding wet weather conditions and using pile screws, these measures can be found in detail in the oSMP [APP-182]. Additionally, while a 60-year solar farm may seem like a long-term land use from a human perspective, it represents only a brief moment in the lifespan of soils, which

Relevant Representation Number	Representation	Applicant Response
		develop and change over geological timescales spanning hundreds of thousands to millions of years. Therefore, its impact on soil processes is relatively short-term in the context of soil evolution. The Applicant sought to minimise the use of BMV land based on information known at the stage of site selection. This was informed by the Provisional Agricultural Land Classification Map produced by Natural England. This resulted in the avoidance of land beyond the Order limits which, based on publicly available mapping, was shown to include larger areas of Grade 2 land. The land proposed to be within the Order limits was refined throughout the pre-application stage as the land was surveyed. The reduction of BMV is set out in the Design Approach Document [AS-013] but in summary included: 84 acres of BMV land removed after initial survey results and a further 161 acres of BMV land removed post statutory consultation.

Relevant Representation Number	Representation	Applicant Response
Masterplanning, Landscape & Visual Impact and Glint & Glare		
AS.002	If the development includes solar panels, there is a risk of glare affecting nearby properties and road users. A detailed glare assessment, considering the positioning and angle of the panels, is essential to mitigate any adverse effects.	A Glint and Glare Assessment [APP-188] was provided as part of the wider DCO submission. Section 5 of the Glint and Glare Assessment details the proposed design that has informed the assessment, including the following characteristics: • Fixed panels (no solar tracking system); • 15 degrees tilt (elevation) angle; • Due South orientation (180 degrees azimuth from North); • Panel material: Smooth glass with Anti-reflective coating, with a slope error of 8.43 mrad; and • The design includes solar panels at different heights due to potential flooding.

Relevant Representation Number	Representation	Applicant Response
		The Glint and Glare Assessment was an iterative process by which emerging findings were shared with the wider project team. Where mitigation was found to be required, this has been embedded in the proposed design in the form of hedgerows to provide screening. Where the Glint and Glare Assessment [APP-188] identified the need for mitigation of impacts relating to road or rail users, the Outline Landscape and Ecology Management Plan [APP-179] secures the provision of opaque screens which would be used until hedgerows are of a sufficient height and depth to mitigate such impacts.
AS.002	-How the project will alter the character of the public rights of way in the area. -Far Hill Lane public right of way application	The Landscape and Visual Impact Assessment [AS-017] details the impact of the Proposed Development on Public Rights of Way. Minimising such impacts has been a consideration from the outset of the project and has been achieved through securing buffers of at least 15m between a Public Right of Way to the first proposed solar panel. In many instances this distance is exceeded, in places measuring in more than 150m. Whilst Far Hill Lane is not a Public Right of Way, land to the southern side of the lane (leading from the east) is not within the Order limits and would therefore not change. An offset and new planting has been incorporated to the north of the land, and to the western part of the southern side, to reduce the visual impact experienced by current, and potential future, users of the route.

Relevant Representation Number	Representation	Applicant Response
AS.002	Lack of detail on the siting of aspects of the planned project	For most components, including the locations of solar panels, substations and BESS units, the siting of each component of the Proposed Development is secured on the Works Plan [APP-023]. Within those areas, parameters would define the more precise locations of where components could be located. For example, the power conversion stations would be located no less than 100m from homes or 50m from public rights of way, unless they have acoustic mitigation. The final locations will be determined in the detail design, which would come after consent is granted.
AS.002	Visual Impact Assessments have been carried out on behalf of Bassetlaw District Council by Nottinghamshire County Council. More detailed study of the full submission will be included within the Council's LIR. Therefore, Bassetlaw District Council is in agreement with the comments made by Nottinghamshire County Council on this topic. Landscape and visual effects	Noted. Consultation with Bassetlaw District Council and Nottinghamshire County Council's landscape consultants has been undertaken throughout the pre-application stage and is detailed in Landscape and Visual Impact Assessment [AS-017], Appendix 11.5: LVIA Consultation [APP-133].
RR.135	Concerns about lack of clarity on the location of the BESS	With reference to the Works Plans [APP-014] the BESS would be located within Works Number 2 and therefore would be located across two parcels, one on either side of the River Trent.

Relevant Representation Number	Representation	Applicant Response
RR.135	In respect of Landscape and Visual, NSDC have received advice from its externally appointed advisors and as such would wish to make the following comments. This advice comprises initial comments, as a full review of the landscape and visual elements of the scheme is currently being carried out. This full review will be included within the individual Local Impact Report (LIR) submitted by NSDC later in the examination process. This will comprise a comprehensive review of the submitted LVIA chapter and associated appendices and figures of the ES to Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs), 10th January 2020, by the Landscape Institute (LI).	It is noted that the NSDC will provide a fuller review of the impacts of the Proposed Development on landscape character and visual amenity within the Local Impact Report. The LVIA does identify several significant adverse effects upon the existing landscape and visual baseline. The LVIA also reports negligible beneficial effects on landscape character areas (TW PZ 17: Besthorpe River Meadowlands, TW PZ 44: Fledborough Holme River Farmlands, and LVCA: North Clifton) that only contain new landscape and ecology works due to the improved vegetation cover, biodiversity and habitat connectivity. The iterative assessment and design process undertaken throughout the pre-application phase has sought to minimise adverse impacts as far as has been practical however some impact is considered inevitable. This is reflected in the Overarching National Policy Statement for Energy (EN-1), paragraph 5.10.5 which states that "*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.*"

Relevant Representation Number	Representation	Applicant Response
	By reason of its mass and scale, we judge that the proposed development would lead to Significant Adverse effects upon the existing landscape and visual baseline, which is reflected within the submitted Landscape and Visual Impact Assessment (LVIA). The development has the potential to transform the local landscape by altering the character on a large scale. This landscape change also has potential to affect wider landscape character, at a regional or county scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity, and agricultural character, which are defining characteristics of the area. We are particularly concerned about the landscape character effects through changes to the land use over an extensive area of agricultural land, as identified in chapter 11.6.6 and 11.6.15 of the LVIA chapter. The LVIA chapter identifies that "changes would have direct effects on the character of the Order Limits due to the change from a predominantly agricultural to an operational solar farm, resulting in equipment and structures within an otherwise open landscape." This should be considered in regard to affecting a vast area of land.	

Relevant Representation Number	Representation	Applicant Response
RR.135	Significant landscape effects are subsequently identified within the LVIA chapter with the identification of Significant adverse effects to Published Landscape Character Areas as well as Local Village Character Areas, at Construction, Year 1 Operation and Year 15 Operation. Significant Residual landscape effects largely arise from character areas directly affected (where the development is located within these areas), and from local villages in close proximity.	Noted. Planting proposed as part of the Proposed Development is a key means of mitigation of landscape and visual effects. The landscape mitigation and enhancement measures set out in the Outline Landscape and Ecology Plan [APP-179] proposes the planting and seeding of species that are characteristic to the local environment and sets out how plants would be established during the first five years following planting. The Outline Landscape and Ecology Plan [APP-179] continues by setting out how the landscape would be managed for the operational duration of the Proposed Development. A detailed Landscape and Ecology Management Plan will be provided for review and approval prior to construction, as set out in Requirement 8 of the Draft DCO [APP-007].

However, the residual landscape effects are only judged to be to two small character areas outside of the Newark and Sherwood boundary. We would question this judgement, as the extensive land use change from a large solar farm will remain, and it is unlikely that the mitigation planting, even once established, would mitigate sufficiently, so we would expect wider Significant effects to remain. This will be explored further in our full review. The scale and extent of development would also lead to Significant Adverse effects on views from visual receptors, changing from views experienced within an agricultural or rural landscape to that of a landscape containing large scale solar development. The development has been identified in the LVIA chapter as resulting in a Significant change to a variety of visual receptors at Construction, Year 1 Operation and Year 15 Operation. Significant Residual visual effects largely arise from sensitive users in close proximity to the development where it is not possible to sufficiently screen views of the development. While we acknowledge new planting and habitat creation will add valuable assets across this area, this is through the introduction of a large-scale solar development in an agricultural landscape. The planting, if establishes as predicted, will also go some way in screening and integrating proposals in views. However, we do note that the reduction in Significant landscape and visual effects predominantly relies upon the successful establishment of the planting scheme.

Relevant Representation Number	Representation	Applicant Response
	The cumulative landscape and visual effects of the proposed development are considered in Chapter 18 of the ES, and the assessment of landscape and visual effects are presented in Table 18.2. Significant cumulative landscape and visual effects judged to be limited to two Inter-Project schemes: • 21/01577/FULM Installation of a solar farm and battery storage facility with associated infrastructure, where it is judged that a moderate to major adverse cumulative effect would arise for construction and operation to the landscape character of MNF PZ 12; and • EN020034 North Humber to High Marnham, where it is judged that a moderate to major adverse cumulative effect would arise for construction and operation to the visual amenity of users of PRoW to the south of East Drayton.	

Relevant Representation Number	Representation	Applicant Response
RR.135	While a 2km study area has been utilised for schemes to be considered for InterProject landscape and visual effects, due to the extent and proximity of additional NSIP scale solar schemes in the area, we would suggest the examination is utilised to explore the potential for significant effects from these additional schemes, such as Cottam, Gate Burton, West Burton and Tillbridge. These large-scale solar schemes occupy some of the same landscape character areas as One Earth Solar, including falling within National Character Area 48 - Trent and Belvoir Vales, and the Floodplain Valley and Unwooded Vales Character Areas within the East Midlands Regional Landscape Character Assessment.	The approach to assessing cumulative landscape (and visual) effects is consistent with PINS Guidance on Cumulative Effects and follows a proportionate methodology as outlined in GLVIA3. The assessment focusses on Other Developments within the agreed 2km LVIA Study Area. It is noted that the nearest of the identified additional schemes lies between 4.68 - 16.5km from the Proposed Development, with the West Burton Solar Project being the closest. Within the Landscape and Visual Impact Assessment [AS-017] the Proposed Development was assessed as having a Negligible effect during construction, operation and maintenance, and decommissioning on the following character areas: • National Character Area 48 – Trent and Belvoir Vales, • The Floodplain Valley and Unwooded Vales Character Areas of the East Midlands Regional Landscape Character Assessment. As detailed in ES Chapter 18: Cumulative Effects [APP-047], effects assessed as negligible from the Proposed Development were excluded from the cumulative assessment. This is on the basis that negligible effects are typically minimal or imperceptible, and therefore unlikely to contribute meaningfully to cumulative impacts alongside Other Developments.

Relevant Representation Number	Representation	Applicant Response
		The potential cumulative effects of the large-scale solar schemes in the Gainsborough area – including Cottam, West Burton, Tillbridge, and Gate Burton – were considered during their respective Examinations through a Joint Report on Interrelationships between NSIPs. For example, a Technical Note on Cumulative Effects of Additional Schemes [EN010132/REP5-030] was submitted to the West Burton Solar Project Examination and concluded that no intervisibility exists between the schemes due to factors such as separation distance, intervening topography, built structures, and vegetation. As a result, no significant cumulative landscape and visual effects were identified during construction, operation (at both Year 1 and Year 15), or decommissioning phases.

Relevant Representation Number	Representation	Applicant Response
		Furthermore, in its decision letter for Cottam Solar Farm, the ExA also reached the same conclusions (DL 4.21). With regard to cumulative effects on regional landscape character areas, *"the ExA found that it identified that no significant cumulative effects would arise as a result of the Proposed Development along with other cumulative development. It points to the screening provided by the embedded and additional mitigation and the ability of the landscape to accommodate some change without undue adverse effects"* (ER 3.6.68). With regard to cumulative effects on visual receptors, *the ExA concluded no significant cumulative visual effects as a result of the Proposed Development with other committed and planned development, including the other NSIP solar projects that have been identified"* [ER 3.6.108]. Given the separation distance between the One Earth Solar Farm and the Gainsborough area schemes (outside of the 2 km LVIA Study Area), it is the applicant's view that the previous examination reports further support the conclusion that significant cumulative effects on landscape and visual receptors (with One Earth and the Gainsborough area) are unlikely.

Relevant Representation Number	Representation	Applicant Response
RR.135	The mass and scale of these projects combined has the potential to lead to adverse effects on landscape character over an extensive area across these published character areas. The landscape character of the local, and potentially regional area, may be completely altered over the operational period, particularly when experienced sequentially for visual receptors travelling through the landscape and experiencing these schemes across potentially several kilometres, albeit with over a 3km gap between the One Earth scheme and the closest Inter-Project scheme to the east of the River Trent. These schemes combined, if built, would clearly require the update of any published landscape character assessment, including the NCA's, so as to include large scale solar as a defining land use characteristic as well as agriculture.	The approach to assessing cumulative landscape (and visual) effects is consistent with PINS Guidance on Cumulative Effects and follows a proportionate methodology as outlined in GLVIA3. The assessment focusses on Other Developments within the agreed 2km LVIA Study Area. It is noted that the nearest of the identified additional schemes lies between 4.68 - 16.5km from the Proposed Development, with the West Burton Solar Project being the closest. Within the Landscape and Visual Impact Assessment [AS-017] the Proposed Development was assessed as having a Negligible effect during construction, operation and maintenance, and decommissioning on the following character areas: • National Character Area 48 – Trent and Belvoir Vales, • The Floodplain Valley and Unwooded Vales Character Areas of the East Midlands Regional Landscape Character Assessment. As detailed in ES Chapter 18: Cumulative Effects [APP-047], effects assessed as negligible from the Proposed Development were excluded from the cumulative assessment. This is on the basis that negligible effects are typically minimal or imperceptible, and therefore unlikely to contribute meaningfully to cumulative impacts alongside Other Developments.

Relevant Representation Number	Representation	Applicant Response
		The potential cumulative effects of the large-scale solar schemes in the Gainsborough area – including Cottam, West Burton, Tillbridge, and Gate Burton – were considered during their respective Examinations through a Joint Report on Interrelationships between NSIPs. For example, a Technical Note on Cumulative Effects of Additional Schemes [EN010132/REP5-030] was submitted to the West Burton Solar Project Examination and concluded that no intervisibility exists between the schemes due to factors such as separation distance, intervening topography, built structures, and vegetation. As a result, no significant cumulative landscape and visual effects were identified during construction, operation (at both Year 1 and Year 15), or decommissioning phases.

Relevant Representation Number	Representation	Applicant Response
		Furthermore, in its decision letter for Cottam Solar Farm, the ExA also reached the same conclusions (DL 4.21). With regard to cumulative effects on regional landscape character areas, *"the ExA found that it identified that no significant cumulative effects would arise as a result of the Proposed Development along with other cumulative development. It points to the screening provided by the embedded and additional mitigation and the ability of the landscape to accommodate some change without undue adverse effects"* (ER 3.6.68). With regard to cumulative effects on visual receptors, *the ExA concluded no significant cumulative visual effects as a result of the Proposed Development with other committed and planned development, including the other NSIP solar projects that have been identified"* [ER 3.6.108]. Given the separation distance between the One Earth Solar Farm and the Gainsborough area schemes (outside of the 2 km LVIA Study Area), it is the applicant's view that the previous examination reports further support the conclusion that significant cumulative effects on landscape and visual receptors (with One Earth and the Gainsborough area) are unlikely.

Relevant Representation Number	Representation	Applicant Response
RR.135	The One Earth Solar Farm would evidently deliver landscape and ecological improvements through mitigation areas and planting. However, this will be dependent upon the information set out in the Outline Landscape and Ecology Management Plan (shown on the Mitigation plan within this document) and Illustrative Masterplan which illustrate the mitigation, which should be further explored, and is assumed would be refined at the detailed design stages.	The assumption that the design and landscape management practices would be refined and approved is correct. This is secured by Requirement 5: Detailed design approval, and Requirement 8: Landscape and ecology management plan within the Draft DCO [APP-007].
RR.135	The DCO should include for approval of any subsequent detailed landscape and ecological mitigation scheme (planting works), as referenced in Schedule 2 of the DCO. This should clearly link to any landscape mitigation scheme that is submitted as part of the scheme, and subsequently that which has been assessed as part of the LVIA. This should not just be a management plan, but a detailed landscape scheme clearly identifying plant species, numbers, and specifications along with planting details.	A Landscape and Ecology Management Plan will be provided for review and approval under Requirement 8 of the Draft DCO [APP-007]. This will be a detailed document, building on the information provided within the Outline Landscape and Ecology Management Plan [APP-179] including the lists of plant species, numbers, specifications, and planting details requested.

Relevant Representation Number	Representation	Applicant Response
RR.135	The DCO should also include for an appropriate period of landscape maintenance, currently referenced at article 31(11), that ties into a period of time identified in the Outline Landscape and Ecology Management Plan and would expect an initial 15 year period of management and maintenance as a minimum, which would align with the assessed residual landscape and visual effects. This would subsequently be regularly reviewed and monitored at a reasonable period, such as every 3 to 5 years and implemented for the lifetime of the project. This should include for a reasonable plant replacement program, such as following a significant loss or failure to thrive, to ensure the planting scheme meets the aims and objectives laid out in the submission.	The replacement of plants that fail to establish within the first five years is secured within the Outline Landscape and Ecology Management Plan [APP-179] which, under 'Establishment Maintenance', provides the following prescription: "*Replace failed or defective plants in September Annually".* Section 7 of the Outline Landscape and Ecology Management Plan [APP-179] also secures the need to monitor and review the management prescriptions undertaken.

Relevant Representation Number	Representation	Applicant Response
RR.135	Proposed vegetation removal is identified within the Draft DCO, Vegetation Removal plans (within the Outline Landscape and Ecology Management Plan) and Appendix 11.6 Arboricultural Report. Clear vegetation removal processes should be put in place to ensure any vegetation loss is aligned with these plans and schedules and further removal or works is agreed with the relevant parties prior to any works being carried out. This should clearly relate to vegetation removal plans and AIA, and this must also include vegetation removal or works to facilitate wider highways and access works, such as for abnormal loads.	The extent of vegetation clearance, including that proposed to facilitate access, is shown on the Vegetation Removal Plan provided in Appendix C of the Outline Landscape and Ecology Management Plan [APP-179]. Implementation of a detailed Landscape and Ecology Management Plan, including vegetation removal, requires approval under Requirement 8 of the Draft DCO.
RR.154	Landscape and Visual	It is noted that the Nottinghamshire County Council will provide a fuller review of the impacts of the Proposed Development on landscape character and visual amenity within the Local Impact Report.

Relevant Representation Number	Representation	Applicant Response
	These comments are headline observations covering the initial main points relating to Landscape & Visual matters. More detailed study of the full submission will be included within the Council's LIR. The full review will be carried out in line with Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs), 10th January 2020, by the Landscape Institute (LI). While the focus of our concern is Nottinghamshire, and separate representations will be made on behalf of other host local authorities, from a Landscape and Visual perspective, due to the scale of the proposed scheme it has been considered in its entirety.	
RR.154	Landscape Character The scale of the proposed development would create a very considerable change in Landscape Character by introducing static massed industrial infrastructure over a vast area, in turn changing the sense of openness, seasonal rhythm of farming practices and rural tranquillity currently experienced. This alteration to Landscape Character would certainly be evident locally, and potentially regionally.	Whilst the introduction of new elements into the landscape is an inevitable part of the Proposed Development, the retention of the existing landscape pattern, maintenance of a sense of openness and the protection of areas of tranquillity have each been considerations through the iterative design process that have resulted in design decisions including:

Relevant Representation Number	Representation	Applicant Response
	One of the more generic key features of the local Landscape Character is that of openness and extensive views in a relatively simple agricultural enclosure framework. Mitigation of the proposed development will require a considerable level of screening that will introduce additional vegetation elements and alter management practices. This in turn will reduce the sense of openness and extensive views. In addition, the change in features and management practices over a substantial area would adjust the experiential perception of people living in and travelling through the landscape. Although the development can be viewed as temporary and reversible, and will generally have limited impacts upon Landscape Resources, the proposed 60-year operational period will extend over generations and feel like a permanent change.	• Existing hedgerows will be retained and enhanced to maintain the scale and pattern of the landscape (other than areas of removal required for access as set out on the Vegetation Removal Plan provided in Appendix C of the Outline Landscape and Ecology Management Plan [APP-179]. • Substantial offsets have been embedded in the design, as secured through the Works Plan [APP-023], particularly along key routes travelled by people (such as along road corridors or Public Rights of Way) and in the foreground of important views. • Areas with a higher level of tranquillity, the River Trent, have been kept free from solar panels. The number of significant adverse effects is not necessarily a reliable indicator of the overall impact of the Proposed Development. A much more useful indicator lies in the qualitative information that underpins each judgement. In this case, the significant landscape effects identified in the Landscape and Visual Impact Assessment [AS-017] relate to the Order Limits, Local Landscape Character Areas, and Policy Zones, which reflects the relatively localised impacts that the Proposed Development would have on the landscape. Importantly to note, these significant landscape effects would be temporary in nature.

Relevant Representation Number	Representation	Applicant Response
	While full review comments will be provided in the LIR we are particularly concerned by the number of significant adverse effects identified in the applicant's assessment, Appendix 11.3: Landscape Baseline and Effects of the ES. Most of these are evident during construction and at year 1 operation but there are a number that remain even at year 15 of operation when mitigation should be fully established. These include: · Order Limits Landscape Character Area - Moderate Adverse · Trent Washlands PZ 20: Dunham on Trent Village Farmlands - Moderate Adverse · Mid-Nottinghamshire Farmlands PZ 09: East Drayton - Moderate Adverse · Local Village Character Area: Fledborough – Major Adverse · Local Village Character Area: Ragnall – Moderate Adverse Given the extent of the proposed development there may be other areas of significant effect identified during the more detail evaluation to be included in the LIR.	

Relevant Representation Number	Representation	Applicant Response
RR.154	Visual Effects The sprawling extent of the development proposal makes it almost impossible to mitigate all potential visual impacts, but this is partially helped by the relatively flat nature of the landscape minimising elevated vantage points. Mitigation of visual impacts is proposed through the introduction of additional vegetation features, (hedgerows, tree belts, hedgerows with individual trees), or through a change in management practices of existing hedgerows to 3m height to ensure effective screening. While this combined approach should be effective in screening most of the development it will create significantly more visual enclosure and shortening of views.	Substantial offsets from locations where key views are experienced have been embedded in the Proposed Development as secured through the Works Plan [APP-023]. This is intended to maintain the sense of openness where practical, seeking to avoid a sense of visual enclosure. The taller elements noted (PCS and BESS) would not be located in proximity to sensitive visual receptors (people). With reference to the Outline Design Parameters [APP-172], the batteries will be housed within enclosures each measuring up to 3.5m high. Only the buildings within the BESS compound may extend up to 8m tall. These buildings would not exceed a footprint of 1,200m^2. Therefore, in order to maintain flexibility regarding the precise location of these buildings, the entire BESS enclosure has been assessed as 8m tall. Once built, the extent of these taller features would be far reduced. As identified in RR.154, the location of the PCS have not been detailed spatially. However, the Outline Design Parameters [APP-172] secures that they would not be located within 100m of residential dwellings, and 50m of existing public rights of way without acoustic mitigation.

Relevant Representation Number	Representation	Applicant Response
	It is also noted that the more substantial PCS and BESS facilities have a maximum installation height of 4.5m and 8m respectively. These features will stand above the managed hedgerow height and in some locations may well be visible from residential areas, Public Rights of Way, roads or other publicly accessible locations. While the BESS locations have now been fixed, the locations of the PCS do not look to have been detailed. This is likely to have some impact upon the successful full review evaluation of the submission. We are particularly concerned by the number of significant adverse visual effects, (major or moderate adverse), identified in the applicant's assessment, (Appendix 11.4: Visual Baseline and Assessment), at year 15 of operation when mitigation planting should be fully effective. This occurs at 11 viewpoints within the wider study selection. Again, given the extent of the proposed development and number of viewpoints considered, other views may be identified as incurring significant effects during the more detailed evaluation.	The number of significant adverse effects is not necessarily a reliable indicator of the overall impact of the Proposed Development. A much more useful indicator lies in the qualitative information that underpins each judgement. In this case, the significant visual effects identified in the Landscape and Visual Impact Assessment [AS-017] would be mostly experienced by people within or immediately adjacent to the Order Limits and no significant effects are predicted beyond approximately 200m of the Order Limits, which reflects the relatively localised impacts that the Proposed Development would have on the people's views. Importantly to note, these significant visual effects would be temporary in nature.

Relevant Representation Number	Representation	Applicant Response
RR.154	Mitigation Mitigation measures proposed need to balance the screening of facilities with the potential changes to the wider sense of place experienced in the current landscape. It is noted the application team have incorporated offsets in and around the wider DCO which will hopefully address some of the concerns raised around closing down of views and the experience of open skies. While details of the mitigation proposals are not included at this stage, indications are that they would be appropriate within the existing landscape, providing they follow guidance on local characteristics and species selection. Sensitive placement of these features within the existing landscape framework is key to successful integration of this scheme. In review of the Illustrative Masterplan (EN010159-000124-2.7), some of the proposed new hedgerow alignments look to be discordant with the rhythm of the existing field boundaries pattern. Further evaluation of any potential impact from these will be included in the full review.	Outline details of the mitigation proposals, including species selection, is provided in the Outline Landscape and Ecology Management Plan [APP-079]. Implementation of a detailed Landscape and Ecology Management Plan, including vegetation removal, requires approval under Requirement 8 of the Draft DCO [APP-007]. Replacement of plants that fail to establish within the first five years is secured within the Outline Landscape and Ecology Management Plan [APP-179] which, under 'Establishment Maintenance', provides the following prescription: "*Replace failed or defective plants in September annually".* Section 7 of the Outline Landscape and Ecology Management Plan [APP-179] also secures the need to monitor and review the management prescriptions undertaken. With respect to the duration of the establishment maintenance period, this is proposed to be for five years following the start of operation. Following the first five years, the long-term management will begin which is proposed to be undertaken for the duration of the operational phase (total of 60 years).

Relevant Representation Number	Representation	Applicant Response
	The final key consideration of mitigation is the successful establishment of all proposed planting elements to ensure the planned screening and enhancement objectives are achieved. This will require a detailed landscape scheme clearly identifying plant species, numbers and specifications along with planting details and appropriate maintenance schedules that link with the Outline Landscape and Ecology Management Plan. Given the significance of the scheme, we would expect establishment maintenance periods to run to the full extent of the last evaluation stage, (operational year 15), to ensure successful establishment of the objectives. This maintenance period should include regular reviews and replacement of planting stock, more frequent in the early years dropping to a 2 or 3 yearly cycle after the first 5 years. Active ongoing management of mitigation features should be included for the lifetime of the facility and clearly set out in the Landscape and Ecology Management Plan.	

Relevant Representation Number	Representation	Applicant Response
	Any following detailed landscape and ecological mitigation scheme, (planting works), should clearly link to the landscape mitigation proposals submitted as part of the application, and which accordingly has been assessed as part of the LVIA.	
RR.077	Landscape and Visual AAH Consultants, on behalf of the Council, have reviewed the relevant Landscape and Visual elements of the DCO Application and have provided the following initial comments: The One Earth Solar Farm, proposed on land close to High Marnham substation, is located across several authority areas and sized for a secured grid connection of 740MW.	Noted. No response required.

Relevant Representation Number	Representation	Applicant Response
	A large portion of the redline boundary, and subsequently development areas, is located within Nottinghamshire, with approximately 20% located within Lincolnshire, including an area identified for a project substation and BESS capacity. However, from a landscape and visual perspective, due to the scale of the proposed scheme it has been considered in its entirety, including views from Lincolnshire, as well as wider landscape effects within the County. By reason of its mass and scale, it is judged that the proposed development would lead to Significant Adverse effects upon the existing landscape and visual baseline, which is reflected within the submitted Landscape and Visual Impact Assessment (LVIA).	

Relevant Representation Number	Representation	Applicant Response
	The development has the potential to transform the local landscape by altering the character on a large scale. This landscape change also has potential to affect wider landscape character, at a regional or county scale, replacing large areas of agricultural or rural land with solar development, and affecting the current openness, tranquillity and agricultural character which are defining characteristics of the area. We are particularly concerned about the landscape character effects through changes to the land use over an extensive area of agricultural land, as identified in paragraphs 11.6.6 and 11.6.15 of the LVIA chapter [APP-040]. The LVIA chapter, paragraph 11.6.16 identifies that "changes would have direct effects on the character of the Order Limits due to the change from a predominantly agricultural to an operational solar farm, resulting in equipment and structures within an otherwise open landscape". This should be considered with regards to affecting a substantial area of land.	

Relevant Representation Number	Representation	Applicant Response
RR.077	Significant landscape effects are subsequently identified within the LVIA chapter with the identification of Significant adverse effects to Published Landscape Character Areas as well as Local Village Character Areas, at Construction, Year 1 Operation and Year 15 Operation. Significant Residual landscape effects largely arise from character areas directly affected (where the development is located within these areas), and from local villages in close proximity. However, the residual landscape effects are only judged to be to two small character areas outside of the Lincolnshire boundary. We would question this conclusion, as the extensive land use change arising from a large solar farm will remain, and it is unlikely that the mitigation planting, even once established, would mitigate sufficiently. Therefore, it would be expected that wider Significant effects would remain. This will be explored further in the full review to be provided within the LIR.	The number of significant adverse effects is not necessarily a reliable indicator of the overall impact of the Proposed Development. A much more useful indicator lies in the qualitative information that underpins each judgement. In this case, the significant landscape effects identified in the Landscape and Visual Impact Assessment [AS-017] relate to the Order Limits, Local Landscape Character Areas, and Policy Zones, which reflects the relatively localised impacts that the Proposed Development would have on the landscape. Importantly to note, these significant landscape effects would be temporary in nature.

Relevant Representation Number	Representation	Applicant Response
RR.077	The scale and extent of development would also lead to Significant Adverse effects on views from visual receptors, changing from views experienced within an agricultural or rural landscape to that of a landscape containing large scale solar development. The development has been identified in the LVIA chapter as resulting in a Significant change to a variety of visual receptors at Construction, Year 1 Operation and Year 15 Operation. Significant Residual visual effects largely arise from sensitive users in close proximity to the development where it is not possible to sufficiently screen views of the development. While it is acknowledged that new planting and habitat creation would add valuable assets across this area, this is through the introduction of a large-scale solar development in an agricultural landscape. The planting, if established as predicted, would also go some way in screening and integrating proposals in views. However, it is noted that the reduction in Significant landscape and visual effects predominantly relies upon the successful establishment of the planting scheme.	It is correct that successful establishment of the planting scheme is a key part of reducing impact. Landscape and visual mitigation have also been embedded in the Proposed Development through the sensitive siting of infrastructure, utilisation of substantial offsets from sensitive receptors, and the limits posed on the heights, materials and colours of proposed equipment. Details regarding this approach to mitigation and design is provided in the Design Approach Document [APP-171].

Relevant Representation Number	Representation	Applicant Response
RR.077	The cumulative landscape and visual effects of the proposed development are considered in Chapter 18 of the ES [APP-047], and the assessment of landscape and visual effects are presented in Table 18.3. Significant cumulative landscape and visual effects judged to be limited to two Inter-Project schemes: • 21/01577/FULM - Installation of a solar farm and battery storage facility with associated infrastructure, where it is judged that a moderate to major adverse cumulative effect would arise for construction and operation to the landscape character of MNF PZ 12; and • EN020034 - North Humber to High Marnham, where it is judged that a moderate to major adverse cumulative effect would arise for construction and operation to the visual amenity of users of the public right of way to the south of East Drayton.	The approach to assessing cumulative landscape (and visual) effects is consistent with PINS Guidance on Cumulative Effects and follows a proportionate methodology as outlined in GLVIA3. The assessment focusses on Other Developments within the agreed 2km LVIA Study Area. It is noted that the nearest of the identified additional schemes lies between 4.68 - 16.5km from the Proposed Development, with the West Burton Solar Project being the closest. Within the Landscape and Visual Impact Assessment [AS-017] the Proposed Development was assessed as having a Negligible effect during construction, operation and maintenance, and decommissioning on the following character areas: • National Character Area 48 – Trent and Belvoir Vales, • The Floodplain Valley and Unwooded Vales Character Areas of the East Midlands Regional Landscape Character Assessment. As detailed in ES Chapter 18: Cumulative Effects [APP-047], effects assessed as negligible from the Proposed Development were excluded from the cumulative assessment. This is on the basis that negligible effects are typically minimal or imperceptible, and therefore unlikely to contribute meaningfully to cumulative impacts alongside Other Developments.

While a 2km study area has been utilised for schemes to be considered for Inter-Project landscape and visual effects, due to the extent and proximity of additional NSIP scale solar schemes in the area, we would suggest the examination is utilised to explore the potential for significant effects from these additional schemes, such as Cottam, Gate Burton, West Burton and Tillbridge which are identified in Appendix 18.2 'Other Development Long List Stages 1 and 2' [APP-146] but are not judged to have a likely significant effect. An Interrelationship report was produced for each of the large scale solar schemes within the Gainsborough area (Cottam, West Burton, Tillbridge and Gate Burton) which evolved through a number of iterations as each examination progressed and as more information on emerging and identified projects became available. Each of these inter-relationship reports included the One Earth Solar Farm as pre-application stage project. These large scale solar schemes occupy some of the same landscape character areas as One Earth Solar, including falling within National Character Area (NCA) 48 - Trent and Belvoir Vales, the Floodplain Valley and Unwooded Vales Character Areas within the East Midlands Regional Landscape Character Assessment, and also the Trent Valley character area within the West Lindsey Landscape Character Assessment.	The potential cumulative effects of the large-scale solar schemes in the Gainsborough area – including Cottam, West Burton, Tillbridge, and Gate Burton – were considered during their respective Examinations through a Joint Report on Interrelationships between NSIPs. For example, a Technical Note on Cumulative Effects of Additional Schemes ([EN010132/REP5-030]) was submitted to the West Burton Solar Project Examination and concluded that no intervisibility exists between the schemes due to factors such as separation distance, intervening topography, built structures, and vegetation. As a result, no significant cumulative landscape and visual effects were identified during construction, operation (at both Year 1 and Year 15), or decommissioning phases. Furthermore, in its decision letter for Cottam Solar Farm, the ExA also reached the same conclusions (DL 4.21). With regard to cumulative effects on regional landscape character areas, *"the ExA found that it identified that no significant cumulative effects would arise as a result of the Proposed Development along with other cumulative development. It points to the screening provided by the embedded and additional mitigation and the ability of the landscape to accommodate some change without undue adverse effects"* (ER 3.6.68). With regard to cumulative effects on visual receptors, *the ExA concluded no significant cumulative visual effects as a result of the Proposed Development with other committed and planned development, including the other NSIP solar projects that have been identified"* [ER 3.6.108].

Relevant Representation Number	Representation	Applicant Response
		Given the separation distance between the One Earth Solar Farm and the Gainsborough area schemes (outside of the 2 km LVIA Study Area), it is the applicant's view that the previous examination reports further support the conclusion that significant cumulative effects on landscape and visual receptors (with One Earth and the Gainsborough area) are unlikely.
RR.077	The mass and scale of these projects combined has the potential to lead to adverse effects on landscape character over an extensive area across these published character areas. The landscape character of the local, and potentially regional area, may be completely altered over the operational period, particularly when experienced sequentially for visual receptors travelling through the landscape and experiencing these schemes across potentially several kilometres, albeit with over a 3km gap between the One Earth scheme and the closest InterProject scheme to the east of the River Trent. These schemes combined, if built, would clearly require the update of any published landscape character assessment, including the NCA's, to include large scale solar as a defining land use characteristic as well as agriculture.	Landscape by its very nature is dynamic and constantly evolving for various reasons so a published landscape character assessment is only ever a snapshot in time. However, the need to update a published landscape character assessment is not an appropriate way of measuring landscape impact of a new development for this is the purpose of a landscape and visual impact assessment. In this case, the significant landscape effects identified in the Landscape and Visual Impact Assessment [AS-017] relate to the Order Limits, Local Landscape Character Areas, and Policy Zones, which reflects the relatively localised impacts that the Proposed Development would have on the landscape. Importantly to note, these significant landscape effects would be temporary in nature.

Relevant Representation Number	Representation	Applicant Response
	The One Earth Solar Farm would evidently deliver landscape and ecological improvements through mitigation areas and planting. However, this will be dependent upon the information set out in the Outline Landscape and Ecology Management Plan [APP-176] (shown on the Mitigation plan within this document) and Illustrative Masterplan which illustrate the mitigation, which should be further explored, and assume would be refined at the detailed design stages.	
RR.077	The DCO should include for approval of any subsequent detailed landscape and ecological mitigation scheme (planting works), as referenced in Schedule 2 of the DCO. This should clearly link to any landscape mitigation scheme that is submitted as part of the scheme, and subsequently that which has been assessed as part of the LVIA. This should not just be a management plan, but a detailed landscape scheme clearly identifying plant species, numbers and specifications along with planting details.	A detailed landscape scheme, identifying plant species, numbers and specifications will be provided as part of the detailed Landscape and Ecology Management Plan. This will be submitted for review and approval, as required by Requirement 8: Landscape and ecology management plan of the Draft DCO [APP-007]. Replacement of plants that fail to establish within the first five years is secured within the Outline Landscape and Ecology Management Plan [APP-179] which, under 'Establishment Maintenance', provides the following prescription: "*Replace failed or defective plants in September annually".* Section 7 of the Outline Landscape and Ecology Management Plan [APP-179] also secures the need to monitor and review the management prescriptions undertaken.

Relevant Representation Number	Representation	Applicant Response
	The DCO should also include for an appropriate period of landscape maintenance, currently referenced at article 31(11), that ties into a period of time identified in the Outline 7 Landscape and Ecology Management Plan (oLEMP) and would expect an initial 15 year period of management and maintenance as a minimum, which would align with the assessed residual landscape and visual effects. This would subsequently be regularly reviewed and monitored at a reasonable period, such as every 3 to 5 years and implemented for the lifetime of the project. This should include for a reasonable plant replacement program, such as following a significant loss or failure to thrive, to ensure the planting scheme meets the aims and objectives laid out in the submission.	The extent of vegetation clearance, including that proposed to facilitate access, is shown on the Vegetation Removal Plan provided in Appendix C of the Outline Landscape and Ecology Management Plan [APP-179]. Implementation of a detailed Landscape and Ecology Management Plan, including vegetation removal, requires approval under Requirement 8 of the Draft DCO.

Relevant Representation Number	Representation	Applicant Response
	Proposed vegetation removal is identified within the Draft DCO [APP-007], Vegetation Removal plans (within the OLEMP) [APP-176] and Appendix 11.6 Arboricultural Report [APP134]. Clear vegetation removal processes should be put in place to ensure any vegetation loss is aligned with these plans and schedules and further removal or works is agreed with the relevant parties prior to any works being carried out. This should clearly relate to vegetation removal plans and AIA, and this must also include vegetation removal or works to facilitate wider highways and access works, such as for abnormal loads.	
RR.077	Public Rights of Way	The Applicant notes the comment provided by Lincolnshire County Council and will update the reference in the Outline Public Rights of Way Management Plan [APP-086] to refer to BS5709:2018. The Applicant will adhere to the principles of a least restrictive option being applied and will revise the Outline Public Rights of Way Management Plan [APP-086] to state "*Public Rights of Way will be maintained and remain unobstructed at all times when in use, with any crossings of public right of way required by construction vehicles having a gate arrangement for construction vehicles so that right of way is provided to pedestrians and equestrian users*"

Relevant Representation Number	Representation	Applicant Response
	It is noted that no paths within Lincolnshire are planned to be temporarily diverted. The Council appreciates the inclusion of the Outline Public Right of Way Management Plan [APP086], however paragraph 3.2.3 states that gates would be BS5709 compliant, this however should be BS5709:2018. BS5709:2018 advocates that the least restrictive option should be chosen. The Council would therefore stress that rather than gating off the public right of way, a gap should be the preference, and instead the haul road should be gated, allowing unobstructed access for path users. Any further comments will be provided in the LIR and the Council will seek to engage with the applicant regarding these matters.	
Noise		

Relevant Representation Number	Representation	Applicant Response
AS.002	Volume 6.0 Environmental Statement. Volume 2 Aspect Chapters. Chapter 15: Noise and Vibration Section 15.5.2 confirms that a CEMP is in the pipeline to prevent nuisance from the construction phase of the development. I look forward to reviewing the document in due course. Volume 6 Environmental Statement. Volume 3 Technical Appendices supporting ES Volume 2. Appendix 15.3: Construction Noise and Vibration Assessment. Currently it seems that the development phase has the potential to give rise to nuisance complaints from existing residents from trenching, construction of the access track, piling etc. Further details will be required on the specific techniques to be applied and likely mitigation to ensure that impact is reduced appropriately. Construction and operational phases are likely to produce noise that could disrupt local residents. An assessment of noise levels, along with proposed mitigation strategies such as sound barriers and restricted working hours, should be included.	Specific measures for the control of construction noise will be included in the Construction Environmental Management Plan (CEMP). An Outline CEMP has been provided with the application documents [**APP-176]**. The Outline CEMP includes consideration of measures to limit the potential impact of noise during construction, and will be developed further, in discussion with the Local Authorities, as further details of the precise construction plant and equipment required, construction methods to be employed, etc. become available. Requirement 13 of the Draft DCO [APP-007] secures that prior to construction, a CEMP must be submitted to and approved by the relevant planning authority. Since the CEMP will be submitted once further details of the methods of construction, equipment types needed, durations of specific activities, etc. are available, it will be possible to provide greater detail on noise mitigation measures at that stage. The submitted CEMP(s) are therefore the most appropriate place for detailed discussion of noise mitigation measures. Please note, however, that the outline CEMP **[APP-176],** section 2.5) already includes restrictions on construction hours and includes an outline discussion of noise mitigation measures **[APP-176]**, section 2.6 and Table 3.7), including monitoring of construction noise, monthly reporting and engagement with local residents along with other general measures to minimise the potential for construction noise impacts.

Relevant Representation Number	Representation	Applicant Response
		Assessments of both construction noise and operational noise are included in Chapter 15 [**APP-044**] and set out in more detail in Appendix 15.3, Construction Noise and Vibration Assessment [**APP-141**] and Appendix 15.4 Operational Noise Assessment [**APP-142**]. Whilst the potential for construction and operational noise impacts has been identified in these assessments, these impacts are not of sufficient scale to be considered significant effects in EIA terms. For construction noise, impacts would occur when works are taking place near to individual receptors. Any individual receptor would therefore only experience the noise impacts predicted in the construction noise assessment [**APP-141**] for a short duration. The potential for operational noise impacts have been identified if operational equipment is unmitigated, therefore the draft DCO ([**APP-007**], Schedule 2, Requirement 16) requires that an operational noise limit is met by the completed scheme, to avoid significant operational noise effects.

RR.032	Participating at other solar NSIP examinations, WLDC has raised concerned regarding the approach and mechanisms secured in DCOs to allow for the efficient investigation and remedy of noise complaints during the construction phase of projects. This concern principally relates to potential situations where a complainant is experiencing noise from construction activities associated with more than one solar farm (cumulative impacts). 2.19. Should such a complaint be made to WLDC, it will be challenging to determine which project is causing the harm (i.e. by exceeding noise limits) unless there is a mechanism that compels developers to collaborate to ensure the complaint is remedied as quickly and effectively as possible. 2.20. The OESF application contains very limited information on how construction noise complaints are to be remedied. The Outline Construction Environmental Management Plan (CEMP) contains a very brief commentary at section 2.6 "Control of Noise". As written, it does not provide any details on how noise will be controlled and enforced against in the event of a complaint. WLDC requests that more detail be provided in the CEMP to provide clarity on this matter.	Specific measures for the control of construction noise will be included in the Construction Environmental Management Plan. An Outline CEMP [**APP-176]** has been provided with the application documents. The Outline CEMP includes consideration of measures to limit the potential impact of noise during construction, and will be developed further, in discussion with the Local Authorities. Requirement 13 of the Draft DCO [APP-007] secures that prior to construction, a CEMP must be submitted to and approved by the relevant planning authority. Since the CEMP will be submitted once further details of the methods of construction, equipment types needed, durations of specific activities, etc. are available, it will be possible to provide greater detail on noise mitigation measures at that stage. The submitted CEMP(s) are therefore the most appropriate place for detailed discussion of noise mitigation measures. Please note, however, that the outline CEMP (**[APP-176],** section 2.5) already includes restrictions on construction hours and includes an outline discussion of noise mitigation measures (**[APP-176]**, section 2.6 and Table 3.7), including monitoring of construction noise, monthly reporting and engagement with local residents along with other general measures to minimise the potential for construction noise impacts.
RR.135	In respect of potential noise and vibration impacts NSDC have reviewed the Construction Management plan,	Specific measures for the control of construction noise will be included in the Construction Environmental Management Plan. An

Relevant Representation Number	Representation	Applicant Response
	Construction noise and vibration assessment and operational noise assessment. The reports make comparison to appropriate standards and assessment methodologies. The noise assessments indicate that impacts may be experienced at sensitive receptors, but these are likely to be of short duration or can be suitably mitigated. The Construction Management plan proposes working hours of 07:00- 19:00 Monday to Saturday, with occasional works required outside of these hours, to be managed by applications under S61 of the Control of Pollution Act. These hours exceed those normally permitted (07:30- 18:00 Mon- Fri, 08:00- 13:00 sat). Mitigation is detailed in Table 3.7. This includes monitoring of noise, details of which are to be agreed. It is also stated that no heavy groundworks are to be carried out before 08:00 and after 18:00/ 13:00. NSDC would ask that the applicants provide details of what works would be covered by this provision, so that it can be subject to further consideration.	Outline CEMP has been provided with the application documents [**APP-176**]. The Outline CEMP includes consideration of measures to limit the potential impact of noise during construction, and will be developed further, in discussion with the Local Authorities. Requirement 13 of the Draft DCO [APP-007] secures that prior to construction, a CEMP must be submitted to and approved by the relevant planning authority. Since the CEMP will be submitted once further details of the methods of construction, equipment types needed, durations of specific activities, etc. are available, it will be possible to provide greater detail on noise mitigation measures at that stage. The submitted CEMP(s) are therefore the most appropriate place for detailed discussion of noise mitigation measures. The outline CEMP (**[APP-176],** section 2.5) includes restrictions on construction hours limiting most construction activities to 07:00 – 19:00 Mon – Sat. In addition, the outline CEMP ([**APP-176**], Table 3.7) also states that heavy ground works will not take place with 30 m of properties before 08:00 or after 18:00 on weekdays or within 50m of properties before 08:00 or after 13:00 on Saturdays. Heavy ground works would include piling, mechanical excavation, and highways works such as breaking out of existing road surfaces and compaction of new surfaces.

Relevant Representation Number	Representation	Applicant Response
		Generally, works that have the potential to exceed the standard work hours are highways works (to minimise traffic disruption), commissioning activities, and trenchless crossings in particular. The oCEMP ([**APP-176**], section 2.6) states that consent will be sought form the relevant Local Authority under s61 of the Control of Pollution Act 1974 for noisy works that are required outside of normal working hours. S61 applications will include details of the works that are being proposed, along with noise mitigation measures, and are required to be made prior to work commencing. The relevant Local Authority will therefore have the opportunity to review and agree any relevant noise mitigation measures that are needed prior to these activities commencing.

Relevant Representation Number	Representation	Applicant Response
AS.002	There is an expectation that existing residential dwellings are protected from noise levels, from the day-to-day operation of the solar site from exceeding the noise levels detailed through BS8233:2014. Volume 6 Appendix 15.4 Operational Noise Assessment 15.2.19 - further details on plant/mitigation will be required to ensure noise nuisance complaints do not arise from the operation of the solar farm. Whilst the report provides baseline noise monitoring for the development site, the location/type of plant to be incorporated within the development has yet to be firmed up. However, I take some comfort from section 15.5.6 of the report where it is confirmed that noise levels from inverters/power conversation systems will not exceed the limits in the ES chapter and additional noise mitigation will be provided to ensure that this is the case. Noise from the project in an otherwise tranquil area	Full details of the likely plant and equipment, likely methods of operation etc. will not be available until the design of the development is finalised, therefore precise details of mitigation measures cannot currently be provided. The potential for operational noise to lead to significant effects if unmitigated has been acknowledged in the operational noise assessment [**APP-142]**. Since the precise details of noise mitigation cannot be provided at the present time, an operational noise limit has been proposed for inclusion in any consent, which would require operational noise to be controlled to appropriate levels and would therefore avoid significant operational noise impacts. The benefit of this approach, is that the impact is controlled by the DCO requirement, rather than being prescriptive as to how the noise levels are achieved, meaning the Applicant has flexibility at the time to take advantage of quieter plant and equipment if available and feasible with any additional mitigation as required to comply with the requirement. The relevant local planning authority is required to approve the noise mitigation details pursuant to the requirement, so has the requisite control referenced in the RR.
Safety		

Relevant Representation Number	Representation	Applicant Response
AS.002	The Fire Authority has provided comments on the proposal previously and these are as follows: 1) The Fire Authority ask that the above Grid Scale Battery Energy Storage System Guidance (produced by the National Fire Chiefs Council [NFCC]) is provided to the developer. It is the content of which and any other relevant standards (e.g. NFPA) that the Fire Authority will seek assurances against. If that guidance is not to be met then detailed expert evidence and or technical data will be requested to justify such deviations	The Applicant will meet NFCC guidance, and where any variation occurs agree through justification these with Lincolnshire and Nottinghamshire council FRS.
AS.002	2) The Fire Authority notes that within the documentation accessed on line there are several generic statements / observations of 'good intent' made by the developers with regards to the safety considerations for the BESS containers. However, without the detail to substantiate these statements the Fire Authority cannot offer any further meaningful comments.	Consultation will continue with local Fire Authorities through development, in-line with selected energy storage solutions and associated controls. The Statement of Common Ground process has been initiated to formalise this.
AS.002	3) As such the Fire Authority reserve the right to consult further once that detail is known.	The applicant will work with Lincolnshire and Nottinghamshire FRS through development of the BESS, to discuss reasonable safety management and mitigation measures for the chosen battery technology

Relevant Representation Number	Representation	Applicant Response
AS.002	4) Although active fighting is mentioned in the information accessed online, The Fire Authority is aware that the 'industry' is considering moving from extinguishment for fire incidents involving BESS containers, to 'burn out' and protect. This is based on advice from industry leading experts. The Fire Authority seeks to clarify that the relevant enforcing authority for the protection of the environment (for example Environment Agency / Environmental Health / UK Health Security Agency) should be consulted. The relevance being that if this approach is not approved by that enforcing body, this may influence any subsequent risk management and emergency response plans detailing the requisite safety provisions expected for the site. Whilst The Fire Authority does recognise burn out as a potential means to resolve an emergency of this type on site, it is not the role of the Fire Authority to authorise it. The Fire service would also like to stress the importance of the provision of access, that being suitable safe access into and out of the site at all times irrespective of wind direction and incident location Battery energy storage systems safety and fire-fighting response	The applicant will continue to work with the Environment Agency, Environmental Health and UK Health Security Agency to agree the method of site control and note these discussions in the statement of Common Ground. Burn out and protect is an option considered, and the management of associated Firewater is also integrated into the design. Roads accessing the BESS areas will be suitably sized to allow for fire tender access, with routing to be confirmed by oCEMP.

Relevant Representation Number	Representation	Applicant Response
RR.135	Information regarding and consideration of cabling associated with the proposed development and its removal and the end of the operational lifespan.	The Solar PV Site will be reinstated in accordance with the Outline Decommissioning Environmental Management Plan (oDEMP) [APP-178] As detailed in the oDEMP [APP-178], cables left in situ after decommissioning would not impact the future agricultural use of the land, provided they were buried at a minimum 0.9m depth. Cables buried at least 1m below ground are expected to be left in place, and that approach is based on the Applicant's understanding (informed by use of cabling elsewhere and the approach taken on other similar schemes) that these cables would be unlikely to be considered as waste if left in the ground. The approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. However, recognising that industry practice and legislation may change by the time of decommissioning, the Applicant has made clear in the oDEMP that the approach will be confirmed at the time of decommissioning, based on government policy and best practice. Paragraph 1.1.6 of the oDEMP provides:

Relevant Representation Number	Representation	Applicant Response
		"*The mode of cable decommissioning for the grid connection and other underground cables will be dependent upon government policy and best practice at that time. Currently, the most environmentally acceptable option is leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open cut the entire length of the cable route.*" This current approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. The DEMP will need to be approved by the relevant planning authority pursuant to requirement 20 of the draft DCO, and the relevant planning authority would need to consult with both the Environment Agency and Natural England as part of the approval of the DEMP, meaning that there is the mechanism in place to ensure the EA has the opportunity to input to the approach at the time of decommissioning.

Relevant Representation Number	Representation	Applicant Response
RR.154	Outline Export Cable Route Construction Method Statement [EN010159/APP/7.13] includes a diagram in Figure 1.1, representing the cable route. However, the background map is too small a scale and is blurred. A clear plan is required identifying where the cable is to be laid in relation to the highway. There should also be consideration how the sections that affect/cross public highway are intended to be managed and this should be referred to in the OCTMP.	This plan is indicative only, and subject to further refinement and consultation with relevant parties. The Works Plans [APP-014] dictate the areas under consideration for the export cable route, with final alignment to be determined in the detailed design phase, and effects considered in the Final CTMP.

RR.077	Fire Safety In recognition of the emerging technology of Battery Energy Storage Systems (BESS) and the challenges this poses to Fire and Rescue Services the National Fire Chiefs Council circulated a letter to all Chief Fire Officers on the 22 August 2023 drawing attention to the updating of Renewable and low carbon energy Planning Policy Guidance that was updated in August 2 2023 by the former Department of Levelling Up, Housing and Communities to include reference to BESS. This planning policy guidance encourages planning authorities to consult with their local Fire and Rescue Service as part of formal planning consultations and directing developers to the National Fire Chiefs Council guidance on BESS schemes. From the discussion with the Lincolnshire Fire Service (LFR) who have developed standing advice for BESS based on national guidance a program of monitoring and risk assessment has been identified which will be necessary once the BESS has been established to ensure it complies with the Outline Battery Management Safety Plan and Emergency Response Plan. During the first year of operation this will involve 21 days of work for the Fire Service and then two days in each subsequent year for the lifetime of the development. The need for this monitoring and assessment will enable early engagement to ensure the required standards are being complied with; to ensure the BESS is constructed to the correct standards with support from the Fire	The Applicant acknowledges the value in working with the Lincolnshire FRS, and the associated time that is takes to overseeing the safety of the proposed BESS. The applicant will discuss protective provisions through the Statement of Common Ground process, and into examination as required.

Relevant Representation Number	Representation	Applicant Response
	Service; early development of emergency response plans; familiarisations of the BESS for local fire crews and overview by the Fire Service; development of on-going maintenance and updating risk information; and assurance for local residents and communities that the BESS are being independently inspected and monitored to reduce the risk of a fire. To enable the Fire and Rescue Service to undertake the necessary monitoring to ensure the BESS is in accordance with the relevant requirement 7, a financial contribution is required via the Protective Provision within the DCO to the Fire Service so that it has sufficient resources in places to undertake monitoring of the BESS connected to this project. This approach has been agreed as part of the recently approved Gate Burton, West Burton and Cottam DCOs and therefore there is a precedent for this approach to be followed for this application. The applicant has actively engaged with the LFR throughout the pre-application, any further comments will be provided in the LIR. LFR service wish to continue to be engaged, and their views sought during the examination and through the Statement of Common Ground (SOCG).	

Relevant Representation Number	Representation	Applicant Response
Socioeconomics		

AS.002	Bassetlaw District Council remains committed to promoting local employment, skills development, and inclusive economic growth. The One Earth Solar Farm Project presents a significant opportunity to embed these priorities into a major infrastructure development that spans multiple local authority areas including Bassetlaw, Newark and Sherwood, West Lindsey, Lincolnshire County, and Nottinghamshire County Councils. Given the scale and complexity of this development, the Council strongly encourages the adoption of a comprehensive Employment and Skills Plan (ESP) managed collaboratively across all involved authorities. Bassetlaw continues to experience entrenched challenges regarding skills attainment and inclusive employment. Qualification attainment at Level 4 and above remain below the national average, which restricts both economic growth and individual prosperity across the district. Tackling these challenges is a strategic priority for Bassetlaw District Council. The Bassetlaw Local Plan 2020–2038, particularly Policy ST29, emphasises the vital role developers can play in promoting local employment and skills development and support the Council's aim to grow a diverse, higher-value employment base supported by a skilled workforce. As such, developers of major projects are expected to contribute meaningfully to this ambition through the delivery of robust Employment and Skills Plans (ESPs),	As set out in Environmental Statement (ES) Chapter 17 – Socio-Economics [APP-046], the average direct Full-Time Equivalent (FTE) jobs created by the construction of the Project, across the two-year construction period, is 554, with a peak of 750. These are estimated to generate an additional 737 FTE indirectly, through indirect and induced effects along supply chains related to the Project. These will include employment opportunities in a range of trades and skill levels. During operation, the Project is expected to generate 15 direct FTE jobs. A survey of all landowners within the Order Limits Boundary (OLB) determined there are currently around 20 jobs (equating to 7.75 FTE) within the OLB; thus, the net change would be an increase of 7.25 direct FTE jobs. As above, these are estimated to generate an additional 9.75 FTE indirectly, along supply chains. At present, further detail on the types of jobs (such as skill levels, trades and the precise timing of employment demand over the construction period etc) is not currently available. Once a contractor has been appointed, additional detail can be provided to stakeholders and as described below, relevant actions to maximise local benefits will be developed and set out in the final Skills, Supply Chain and Employment Plan (SSCEP). The Outline SSCEP [APP-180] acknowledges the importance of collaboration between the Applicant and local communities, to ensure as much of the employment and upskilling opportunities generated by the Project are realised within the local area and districts. Whilst currently only in outline, the Outline SSCEP

creation of training opportunities, and collaboration with local stakeholders. To maximise social and economic benefits, it is vital to establish clear commitments to local employment and training, particularly given the short construction phase and long operational life of the project.

The development is projected to create up to 750 temporary Full-Time Equivalent (FTE) construction jobs over the two-year construction period, with up to 4,000 additional FTE roles within the wider value chain. While these opportunities are welcomed, the temporary nature of the construction phase requires careful planning to ensure meaningful skills development. Key considerations include:

Prioritising local recruitment to maximise employment for residents of Bassetlaw and neighbouring districts.

Ensuring the inclusion of apprenticeships and structured training programs, particularly in civil engineering, construction, electrical engineering, and power generation. Collaborating with local education and training providers to facilitate short courses, T-Level placements, and apprenticeships, mindful of the short duration of the construction phase.

Addressing rural accessibility challenges for workers, particularly for those without private transport.

Engaging with local DWP offices and employability providers to address economic inactivity and provide opportunities through Skills Bootcamps, SWAPs, and targeted training.

identifies the key stakeholders for the Applicant to collaborate with (public sector partners, education and training providers and business sector groups) and proposes a number of actions to effectively promote opportunities for local people and businesses. These actions include:

- Ensuring effective communication of opportunities (e.g. through forums, liaison with other NSIPs, attending job/career fairs)
- Understanding intervention needs, such as specific education/training requirements, and working with stakeholders to support the development of relevant programmes (e.g. apprenticeships)
- Delivering other supportive activities, such as volunteer placements, work shadowing and visiting local schools

These initial actions have been developed through engagement with relevant stakeholders and will continue throughout the development of the final SSCEP. A working group will be set up to galvanise interest and maximise contributions as early as possible, and to ultimately ensure as much specific detail as possible is provided in the final Plan. The working group will also oversee systems for monitoring and recording the outcomes of the measures, and incorporating lessons learned to update the plan over time.

Whilst the majority of the specific matters proposed form part of the outline SSCEP, additional matters outlined below will be considered and discussed as part of the further development of the SCCEP:

The Council expects all major projects to adopt the CITB National Skills Academy for Construction (NSAfC) Client-Based Approach, embedding workforce development into project delivery. Key construction-phase expectations include:
Prioritisation of local labour through early supply chain coordination and labour brokerage Short-term placements for NEETs, students, and adult learners (e.g. Skills Bootcamps)
Work experience and curriculum-aligned visits with schools and colleges
Creating Apprenticeship opportunities in construction and support roles Benchmarks for these expectations are detailed in Appendix 1 (Infrastructure Projects).
To support KPIs and demonstrate commitment to inclusive and responsible operations, contractors are encouraged to register with the Considerate Constructors Scheme. The operational phase will offer fewer direct employment opportunities, primarily in maintenance, land management, and technical roles. However, ongoing collaboration with
local skills providers is essential to ensure that new roles are accessible and skills gaps are addressed proactively.
Establishing robust training partnerships early on will ensure long-term workforce readiness for the project's 60-year operational life.
While opportunities will be fewer than the construction phase (and numbers of FTEs are not clearly expressed

- Adoption of a CITB National Skills Academy for Construction (NSAfC) Client-Based Approach[1] to the final SSCEP, with: Local inclusive employment, especially among NEETs, people with disabilities, and other priority groups; apprenticeship starts and completions across technical and professional sectors; Industry-recognised qualifications NEBOSH, CMI/ILM, BTEC's etc; Training partnerships with Jobcentre Plus and local education and training providers.
- Recommendation for the final SSCEP to include: Targets for local recruitment and skills development, both during construction and operation; commitments to apprenticeship starts and completions, including structured pathways for progression to higher-level qualifications; Engagement with local education providers to co-design relevant training and ensure pipeline continuity; monitoring and reporting mechanisms to ensure transparent delivery against key performance indicators (KPIs).
- Regular collaboration with the host local authorities to adapt the ESP to changing economic conditions or emerging skills needs.
- Regular monitoring and reporting of progress (quarterly is suggested) against the ESP to accommodate multi-authority oversight (with potential for provision of a monitoring and support fee payable to the Council if this is agreed to be appropriate).
- A willingness to engage with the Growth and Economic Prosperity team on the above (for all the LAs not just Bassetlaw).

Relevant Representation Number	Representation	Applicant Response
	within the provided documentation) there will be valuable opportunities for: Local inclusive employment, especially among NEETs, people with disabilities, and other priority groups Apprenticeship starts and completions across technical and professional sectors Industry-recognised qualifications NEBOSH, CMI/ILM, BTEC's etc. Training partnerships with Jobcentre Plus and local education and training providers While roles new roles are welcome we would encourage further breakdown of what could be available either for entry roles / career changers, and if roles could be fulltime / part-time, permanent or temporary, and how they will be distributed across skill levels. The planning documentation currently lacks detail on partnerships with local FE providers, training bodies, or employment support organisations. Stronger engagement in this area will help the developer promote inclusion and maximise impact.	

Relevant Representation Number	Representation	Applicant Response
	Operational employment and skills expectations are outlined in Appendix 2, with Key Performance Indicators applicable from the point of opening and extending for a period of three years. The developer should provide a breakdown of roles and confirm inclusion of structured development pathways (e.g. internal progression, qualifications) in their operator workforce plans. ESP Recommendations To ensure sustained local benefit, the Council recommends the developer adopt an ESP which includes: Clear targets for local recruitment and skills development, both during construction and operation. Specific commitments to apprenticeship starts and completions, including structured pathways for progression to higher-level qualifications.	

Engagement with local education providers to co-design relevant training and ensure pipeline continuity.
Monitoring and reporting mechanisms to ensure transparent delivery against key performance indicators (KPIs).
Regular collaboration with the host local authorities to adapt the ESP to changing economic conditions or emerging skills needs.
To ensure accountability, Bassetlaw District Council expects the developer to commit to regular monitoring and reporting of progress against the ESP. Given the project's scale and its coverage across several local authority areas (Bassetlaw, Newark and Sherwood, West Lindsey, Lincolnshire County, and Nottinghamshire County Councils), it is crucial that the monitoring and reporting framework is designed to accommodate multi-authority oversight.
Additionally, Bassetlaw District Council reserves the right to levy a monitoring and support fee to cover the costs associated with coordinating multi-authority engagement and oversight.
Fees would be calculated based on weighted officer time plus oncosts to ensure the provision of effective support and compliance management.
The fee would cover Collection, review, and evaluation of data
Ongoing technical advice and support Site visits and engagement meetings
Brokering links with local education and training

providers
Coordination with the local authority lead Skills & Employment Boards / groups to connect stakeholders
Delivery of careers events and wider social value activity
This approach ensures the plan delivers lasting benefits aligned with the Local Plan and supports inclusive growth in the district.
Quarterly updates should be submitted to the Employment and Skills Working Group, which must include representatives from each of the affected authorities to ensure a coordinated and collaborative approach. This collaborative monitoring will facilitate the consistent tracking of
employment, training, and skills outcomes, while allowing each authority to address any area specific challenges in a timely manner.
Summary
The development has the potential to significantly benefit local communities, but these benefits will only be fully realised through a proactive and collaborative approach to employment and skills planning. The Council strongly urges the developer to embed these principles into the project from the outset, fostering long-term socio-economic gains while supporting the transition to a sustainable energy future.
To achieve these benefits, the developer and their partners should:
Commit to a CITB-aligned Employment and Skills Plan

Relevant Representation Number	Representation	Applicant Response
	Prioritise local recruitment and inclusive hiring Deliver apprenticeships and structured in-work training Actively partner with schools, colleges, and job service Monitor and report delivery throughout construction and operation phases Agree to the monitoring fee to fund long-term oversight The Growth and Economic Prosperity Team remains available to support the developer in shaping and delivering a plan that aligns with the district's wider goals for growth, inclusion, and place-based prosperity. A full copy of these comments will be attached to this letter Socio-economic impacts	

RR.032	WLDC remain concerned that the project will have a significant adverse impact on the tourism sector in the District. 2.22. On a cumulative basis, the four NSIP projects in the District will be constructed for a period that may stretch to 10 years. The desirability of West Lindsey as being a place to visit will be reduced and ability for the market to recover is uncertain. 2.23. Existing tourist accommodation in the District will be used to accommodate construction workers and staff associated with each of the NSIP projects. With accommodation being used by workers for a number of years, the capacity for tourists will be significantly reduced, with the impact being a reduction in tourists visiting, staying and spending in the District. The ability for the sector to recover quickly following the completion of construction is a significant concern for WLDC. As stated above, WLDC is concerned that existing tourist accommodation in the District will be used to accommodate construction workers and staff associated with each of the four projects. With accommodation being used by workers for a number of years, the capacity for tourists will be significantly reduced, with the impact being a reduction in tourists visiting, staying and spending in the District. The ability for the sector to	The focus of the comments (2.22, 2.23) relates to the cumulative effects arising from i) a reduction in attractiveness of the wider area for visitors as a cumulative result of NSIP projects and ii) potential cumulative increases in accommodation demand from temporary construction workers and the resulting potential shortage of accommodation for others. The nature of both effects is complicated – especially for larger areas - and as the comment indicates, this was not considered in the current assessment (see responses in the "Topic Cumulative Impacts on the rationale for the scope of the cumulative and interrelationships assessment") for an explanation of the overall approach to the assessment of cumulative effects. We assume that the comment refers to the four NSIP projects (Gate Burton, West Burton, Cottam and Tillbridge, which are in the WLDC area). The cumulative effects chapter (chapter 18 – APP 047 – and specifically Appendix 18.2 the "other developments long list stages 1 and 2 [APP-146] summarised available information on each, with further information to be set out in the Joint Interrelationship Report to be submitted at Deadline 1. This includes: • Gate Burton (9.4km from Proposed development, approved July 2024.Predicted construction programme as 2025-2028. • West Burton (4.6km from Proposed development. Predicted construction programme as 2025-2027). • Cottam (6km from Proposed development, approved September 2024. Predicted construction programme as 2024-2026).

Relevant Representation Number	Representation	Applicant Response
	recover quickly following the completion of construction is a significant concern for WLDC.	• Tillbridge (16km from Proposed development, noted in APP 146 as "pending decision, at examination" (but since that was drafted the examination is complete. Predicted construction programme as 2025-2027). Taking each in point raised in turn. First, in terms of effects on tourism at District level (point 2.22). We note comments have been provided from the same statutory consultee based on the potential cumulative effects on landscape and visual impact (LVIA) and the potential indirect effect, from this, on visitors and tourism. It is assumed that potential LVIA effects are the specific driver of the concern raised. The potential cumulative effects of the large-scale solar schemes in the Gainsborough area – including Cottam, West Burton, Tillbridge, and Gate Burton – were considered during their respective Examinations through a Joint Report on Interrelationships between NSIPs. For example, a Technical Note on Cumulative Effects of Additional Schemes ([EN010132/REP5-030]) was submitted to the West Burton Solar Project Examination and concluded that no intervisibility exists between the schemes due to factors such as separation distance, intervening topography, built structures, and vegetation. As a result, no significant cumulative landscape and visual effects were identified during construction, operation (at both Year 1 and Year 15), or decommissioning phases.

Relevant Representation Number	Representation	Applicant Response
		Furthermore, in its decision letter for Cottam Solar Farm, the ExA also reached the same conclusions (DL 4.21). With regard to cumulative effects on regional landscape character areas, *"the ExA found that it identified that no significant cumulative effects would arise as a result of the Proposed Development along with other cumulative development. It points to the screening provided by the embedded and additional mitigation and the ability of the landscape to accommodate some change without undue adverse effects"* (ER 3.6.68). With regard to cumulative effects on visual receptors, *the ExA concluded no significant cumulative visual effects as a result of the Proposed Development with other committed and planned development, including the other NSIP solar projects that have been identified"* [ER 3.6.108]. Given the separation distance between the One Earth Solar Farm and the Gainsborough area schemes (outside of the 2 km LVIA Study Area), it is the applicant's view that the previous examination reports further support the conclusion that significant cumulative effects on landscape and visual receptors (with One Earth and the Gainsborough area) are unlikely.

Relevant Representation Number	Representation	Applicant Response
		Other amenity effects (noise, air quality/dust, transport) are not considered likely to drive such effects on Tourism at District level, given that the relevant ES chapters (APP -042: Chapter 13: Air Quality; APP -041 Chapter 12: Transport and Access; and APP-044 Chapter 15: Noise and Vibration) each concluded that no significant effects are likely. More generally as discussed in ES Chapter 17 – Socio-Economics [APP-046], the effects on tourism of solar developments are not straightforward. A study on the 'Impacts of Renewable Energy Farms on Visitors to Cornwall' presents the results of a survey amongst 1,007 people at six locations across Cornwall to ascertain views on the presence of solar (and wind) farms and their effect on likelihood of visit. In response to the question "How does the presence of wind farms and solar farms in Cornwall affect the likelihood of you visiting the county again in the future (1,003 responses): 2% responded that they make me less likely to visit; 4% that they make me more likely to visit; 94% they make no difference in my decision to visit again in the future. Other factors such as weather and cost had a larger impact.

Relevant Representation Number	Representation	Applicant Response
		Second, in terms of effects demand for accommodation crowding out demand from tourists (point 2.23) the ES Chapter 17 – Socio-Economics [APP-046], does not assess this potential effect or draw a conclusion on the extent to which local accommodation is expected to be used to accommodate construction workers from the Proposed Development. This will depend on a number of factors: i. the precise demand for workers over the course of the construction period, ii. from where these workers are likely to be drawn (i.e. the labour catchment area) iii. the number of those workers drawn from outside of the local area and hence require overnight accommodation. This, in turn, depends on iv. the skill levels required for these jobs. v. It also depends on the same factors – and the precise construction start/end dates in the other NSIP schemes. For these reasons any such effect is uncertain, although the Outline SSCEP [APP-180] acknowledges the importance of collaboration between the Applicant and local communities, to support employment and upskilling opportunities generated by the Project are realised within the local area and districts.

Relevant Representation Number	Representation	Applicant Response
		As noted above, at this stage of the application process, precise details on skill levels of the construction jobs required for the proposed development are not available. The applicants for Gate Burton, West Burton, Cottam and Tilbridge solar projects produced and "interrelationships report"[2] includes assessment of cumulative effects between these projects and One Earth. A Joint Interrelationship Report for the Proposed Development is to be submitted at Deadline 1. It notes in Table 2.1 the predicted start and end dates of construction for each scheme (as summarised above): • Gate Burton (start Q1 2025 – end Q4 2027/Q1 2028). • Cottam (start Q4 2024 - end Q4 2026). These are noted as the "earliest possible dates") but is the most recent information identified. • West Burton (start Q1 2025 – end Q1 2027). These are noted as the "earliest possible dates") but is the most recent information identified. • Tillbridge (start Q4 2025 – end Q4 2027). It notes in paragraph 1.2.6 that "For Tillbridge, One Earth Solar Farm [and Great North Road Solar Park] can also be scoped out, as they are too far to have the potential to result in cumulative effects".

Relevant Representation Number	Representation	Applicant Response
		Therefore, excluding Tillbridge, current predictions suggest a potential overlap between One Earth and Gate Burton with 1 Quarter (i.e. 3 months) at West Burton. Unless timescales change – for these and the OE scheme - this will limit the extent of demand materialising at any one time. Further information is provided below on the likelihood of adverse effects materialising and potential sources of accommodation if it does. The ES Chapter 17 – Socio-Economics [APP-046], includes data on **existing labour supply,** to provide some further context on the likelihood of construction workers being required from further afield and hence increasing demand for accommodation. Whilst the new construction jobs will likely be required at a range of skills levels (including some specialist skills), the data suggests- in quantitative terms – a relatively large pool of potential workers locally: • There were approximately 400 people employed in construction in the local area in 2022 (Table 17.11 in Environmental Statement (ES) Chapter 17 – Socio-Economics [APP-046]. • There were approximately 10,000 people employed in construction in the three Districts (2022). That number had increased by 17.6% between 2015-2022. Tables 17.11 and 17.12 [APP-046].

Relevant Representation Number	Representation	Applicant Response
		• The number of economically active but unemployed persons (I.e. those out of work but not necessarily claiming unemployment benefit) in the three districts in 2022 amounted to 5,900 people (2021). Table 17.10 [APP-046). • The number of unemployed person who are unemployed, seeking work and in receipt of unemployment benefits (i.e. claimant unemployed) in 2024 ranged from approximately 1,600 in West Lindsay; 2,100 in Newark and Sherwood and 2,500 in Bassetlaw (see Figure 17.2 in Environmental Statement Volume 3 - Figures 17.1 - 17.10 [APP-078]. Further data are available from Visit Britain[3] on existing hotel occupancy rates and hence indicates some existing **hotel capacity to accommodate additional demand**. The data are for the West Midland s region (these data are not publicly available at District level) and indicate average room occupancy of 72% in 2023; 77% in 2024 and 76% in 2025. These data suggest capacity to accommodate some additional demand, with associated positive economic effects.

Relevant Representation Number	Representation	Applicant Response
		Further accommodation provision – not included in the occupancy figure above – could be provided by Air B&B via owners renting their properties (or part thereof) commercially. This is inherently more flexible, and supply is able to respond to short term changes in demand, whilst providing supplementary income for property owners. An additional potential source of accommodation may be via **private rented accommodation**. For illustration, the latest census data from 2021 indicate that the percentage of vacant homes range from 5.21% (Bassetlaw); 4.71% (Newark and Sherwood) and 5.02% (West Lindsay)[4].

RR.135	In respect of Socio Economics, Chapter 17 sets out the potential for direct and indirect job creation during the construction, operation, and decommissioning phases. Whilst job creation is noted as a potential positive benefit, any permanent direct employment is limited to 7.25 jobs, as noted in table 17.18 of the chapter. Although construction jobs are likely to be more significant (peaking at 750 over the course of the construction period) the limitations of the weight to be afforded to this number are acknowledged at paragraph 17.3.38 which states: 'These estimates are based on the best available information at the time of writing, but it should be noted that exact numbers of jobs during both construction and operation may differ.' NSDC can confirm that some early and limited discussions have taken place with the Applicant at the Pre-application stages on the ways in which the economic benefits of the development (through job creation) could be secured (should permission be forthcoming). Moreover, we have recommended that the Applicant consider how they can work with other Applicants for other projects in the Nottinghamshire and Lincolnshire region to deliver such benefits. We note that this and other measures are presented in the Outline Skills, Supply Chain and Employment Plan (OSSCEP). Without prejudice to any view that NSDC may take on the proposed development, this should be developed further during the examination stage, such	The Outline SSCEP [APP-180] acknowledges the importance of collaboration between the Applicant and local communities, to ensure as much of the employment and upskilling opportunities generated by the Project are realised within the local area and districts. Initial actions set out in the Outline SSCEP [APP-180] have been developed through engagement with relevant stakeholders and will continue throughout the development of the final SSCEP. A working group will be set up to galvanise interest and maximise contributions as early as possible, and to ultimately ensure as much specific detail as possible is provided in the final Plan. The working group will also oversee systems for monitoring and recording the outcomes of the measures, and incorporating lessons learned to update the plan over time. At present, further detail on the types of jobs (such as the number of skill levels, trades and the precise timing of employment demand over the construction etc period etc) is not currently available.

Relevant Representation Number	Representation	Applicant Response
	that NSDC can understand the benefits of the proposed development in respect of potential job creation at the district level and how such potential jobs can be secured as direct and tangible employment on either a temporary or permanent basis.	
Transport & Access		
AS.002	Construction traffic and access	The potential impacts on traffic during the project's construction period have been assessed in Chapter 12 [APP-041]. No long term or significant traffic impacts are predicted as a result of the Proposed Development. These are detailed in Table 12-10 of Chapter 12: Transport and Access [APP-041].

Relevant Representation Number	Representation	Applicant Response
RR.032	The applicant's assessment of construction identified two routes: one using the A15 from the east and one using the M18/A1(M)/A1from the west. 2.15. The cumulative projects in the West Lindsey District will also be utilising the A15 (along with other routes) for their construction traffic routes. There is therefore the likelihood of conflict as a number of solar farm developers seek to utilise the A15 at the same time. It is a single lane route. 2.16. To minimise these impacts, WLDC seek clarification as to why the OESF is unable to solely use the western route option. This would avoid adding to the current cumulative construction traffic impacts in the vicinity of the A15, reducing disruption and frustration experienced by communities. 2.17. With regard to the OESF project itself, WLDC would welcome a further explanation of the selection of construction access locations within the District.	The two routes noted are for the transport of Abnormal Indivisible Loads (AIL) only. It is not proposed that the A15 is used for construction traffic access and as such, no significant traffic impact is considered likely (as detailed in Chapter 12 [APP-041]). The location of construction access locations was discussed with Lincolnshire County Council (LCC) as the relevant highways authority for the area.

Relevant Representation Number	Representation	Applicant Response
RR.135	As Nottinghamshire County Council (NCC) are also a 'host' authority for the purposes of the Proposed Development and are also the responsible Highway Authority, we will leave NCC to respond on this topic area within their own relevant representations. We also note that Lincolnshire County Council (LCC) hold a similar capacity as a host authority and Highway Authority.	The Applicant notes the relevant representation provided.

Relevant Representation Number	Representation	Applicant Response
RR.154	The Highway Authority (HA) have reviewed a number of documents submitted and have the following comments, with the main issues highlighted in bold. The extents of the Study Area remain unagreed. Whilst the Consultation Response [EN010159/APP/5.1] and Chapter 12: Transport and Access [EN010159/APP/6.12] both state that the study area has been agreed during scoping and a subsequent meeting, the study area has not been agreed by the HA at any point. Transport Assessment [EN010159/APP/6.21] in paragraph A.12.4.6 also states in regard to the Environmental Impact Assessment that further consultation has been held with NCC. Other than the response to the statutory pre-application consultation provided in July 2024 the HA have had no further input, and the concerns raised in that consultation do not appear to have been adequately addressed in the current documents. A Transport Assessment is an iterative process and the information that is currently under consideration identifies that the unagreed study area proposed does not cover the area required.	The study area was discussed at the outset of the project. Further engagement with NCC is ongoing to address any remaining concerns and adjustments to the oCTMP are being prepared. A Stage 1 Road Safety Audit and further details of the A57 access junction, including an optioneering review, are being prepared and will be provided to NCC to help address any remaining issues.

Relevant Representation Number	Representation	Applicant Response
RR.154	12.3.3. states that Fig 1 of the Transport Assessment [EN010159/APP/6.21] shows the study area, but this is incorrect as Fig 1 is the development location plan. This should in fact refer to Figure 6.	The reference located within Chapter 12: Transport and Access [EN010159/APP/6.12] has been updated and a revised version of Chapter 12: Transport and Access [EN010159/APP/6.12.1] has been issued.
RR.154	Routes which have been excluded were specifically highlighted as an issue in our previous consultation comments and the response given in Consultation Response [EN010159/APP/5.1] is not accepted. Furthermore, this response states that the routes identified will not be used and that these routes will be managed by the Outline Construction Traffic Management Plan [EN010159/APP/7.9] (OCTMP). However, neither routes are referred to in this document but this statement is also directly contradicted by Figure 5 of Transport Assessment [EN010159/APP/6.21] which shows that the A1133 to the south is an intended HGV route (albeit the route shown is cut off) and this is also supported by the traffic figures.	As noted in the various submission documents, construction access would be as follows: From the A1 corridor: A57 from Markham Moor to the new site access junction. Construction traffic will then travel through the site to Main Street, bypassing Ragnall. Access on Main Street will not be permitted to the south of Polly Taylor's Road. Access via Marnham Road and Tuxford will be restricted via the CTMP [APP-181]. From the East, access would be via: A1133 for quarry materials from Besthorpe, with no access proposed to the south. Access from the A57 to the east is also proposed. No other access routes to the south and east will be permitted, with routing confirmed via the CTMP. The Applicant has discussed this further with NCC and has included further details relating to barred routes in a revision to the oCTMP.

RR.154	The A1133 to the South of South Clifton is predicted to have 202 daily construction related vehicles on it and therefore should be included in the study area. The A1133 to the north is predicted to have 86 daily construction related vehicles using it and is included in the study area. This is a clear disparity. We have a significant concern that the A1133 between the A46 and the site and the B1164 linking the A1 south to the site have neither been considered in the assessments nor included in the proposed barred routes. These routes are the shortest and quickest routes to both the east and west parcels from south using either the A1, A46 or the A17. This has potential to create impacts on the settlements of Sutton on Trent, Collingham and Besthorpe (amongst other smaller ones) which have not been considered. Given it is also the shortest and quickest route from the south, as evidenced on online route-finding tools, more of the 381 vehicles assigned to the A57 west of Dunham may also use the route through Sutton on Trent to access the western parcels. All other routes are covered in the Transport Assessment and considered or barred (as opposed to be managed in the OCTMP).	As noted, no construction traffic to the south of Besthorpe will be permitted. The Applicant has discussed this further with NCC and additional barred routes have been included to clarify the position. A revised Transport Assessment and oCTMP report have been prepared with the agreed alterations.

Relevant Representation Number	Representation	Applicant Response
RR.154	There remains disparity with regards to the number of HGVs as a percentage increase which impacts on the extents of the areas which should have been included in the Environmental Impact Statement but have not been.	The Applicant has discussed this matter with NCC and has clarified the point raised. The concern raised related to sections of the route located to the south of Besthorpe. This section is now subject to a construction phase HGV traffic ban. A revised Transport Assessment and oCTMP report have been prepared with the agreed alterations submitted at Deadline 1.
RR.154	A.12.5.21 of Transport Assessment [EN010159/APP/6.21] states that in relation to existing traffic conditions that the counts were recalibrated and crosschecked with DfT data. The majority are now broadly in line with what would be expected but there are two (excluding the A57 Dunham count which appears to be a replica of the A57 west data) where the HGV numbers are considerably different to the information based on DfT data that we provided previously; namely the A57 west of Dunham where it is claimed that there are 865 HGVs compared to the 688 from the DfT (an increase of more than 25%) and the A1133 south of South Clifton where it is claimed that 792 HGVs compared to the 334 from the DfT (an increase of 137%). The response is therefore not accepted.	The traffic count data provided in the Transport Assessment [APP-041] was independently collected and later reverified following comments from NCC. This data is representative of the full week where survey data was collected. The Department for Transport (DfT) data that NCC refers to can be found at the DfT Road Traffic Statistics database (https://roadtraffic.dft.gov.uk/#14/53.2493/-0.8428/basemap-countpoints).

Relevant Representation Number	Representation	Applicant Response
		Data for the A57 that NCC quote can be found here: https://roadtraffic.dft.gov.uk/manualcountpoints/16549. This data for 2023 is estimated data – it is not a snapshot survey of conditions encountered in 2024 and is based upon a traffic survey undertaken on 11th July 2018. As such it is an estimate, based upon surveys from one day. As such, variations in the data can be expected. It is important to note that NCC agree that the overall traffic flow is satisfactory, with the exception of HGV traffic numbers. Data from the A1133 that NCC quote can be found here: https://roadtraffic.dft.gov.uk/manualcountpoints/76031. This data for 2023 is estimated from a neighbouring, unspecified survey point, with no recent calibration of other survey data since at least the year 2000. As such, it is unsurprising that there is a variation between surveyed data and an estimate that is over 23 years old. This matter has been discussed with NCC and the Applicant understands that the Council seems more assured on this point, noting that the variation in HGV traffic would not alter the proposed mitigation. The updates in the oCTMP to strengthen barred routes has also been undertaken to address these concerns.

Relevant Representation Number	Representation	Applicant Response
RR.154	12.4.36 of Chapter 12: Transport and Access [EN010159/APP/6.12] states that the majority of locations included in the (unagreed) study area are subject to Rule 1 of the IEMA guidelines and are assessed if traffic flows (or HGV flows) are anticipated to increase by 30% or more during the construction phase.	The Applicant notes the comment.
RR.154	Table 12.8 indicates a percentage impact summary, based on information given in Table 12.7, presumably against Table 12.5. However, this table only provides overall construction traffic as a percentage of all traffic and subsequent paragraphs describe the range of HGV increases as being between 1.5% and 32.8% and does not highlight the % increase respective to each link. However, when correcting the errors made with regard to the existing numbers of HGVs, NCC have identified that there is a 42% increase in HGV traffic on the A57 West of Dunham and a 60% increase on the A1133 south of South Clifton. As this latter route is not included in the study area, the impacts have not been assessed.	The Applicant has engaged with NCC in relation to the age of the A57 and A1133 traffic data as detailed previously. The Applicant however advises that the impact assessment would not alter, as there are no sensitive receptors on the A57 west of Dunham or on the A1133 as noted in Table 12-6 of Chapter 12: Transport and Access [APP-041]. As such, the assessment would not change the assessment results or mitigation proposals.

Relevant Representation Number	Representation	Applicant Response
RR.154	We would also note that A.12.5.22 and Figure 7 of Transport Assessment [EN010159/APP/6.21] identifies there were traffic surveys at 9 locations but Tables 1 and 3 identify 10 sites. It appears that A57 Dunham is a duplication of the A57 west of Dunham as these have the same traffic flows, which would not be anticipated with the access to High Marnham between them.	NCC are correct in that the A57 data has been used as a proxy for Dunham. This was detailed in the initial scoping meetings, where the Council were requested to confirm the traffic survey locations. The traffic volumes through Dunham are detailed in Table 12-7 in Chapter 12: Transport and Access [APP-041]. The total traffic flow at the peak of construction activity is 50 vehicle movements per day. The NCC Highway design guide https://www.nottinghamshire.gov.uk/transport/roads/highway-design-guide) suggests that Transport Assessments would only be required where the peak hour traffic flow exceeds 30 vehicles. The predicted traffic impact levels in Dunham fall below NCC's own thresholds.

RR.154	The proposed Access points have not been justified and no information submitted to determine the principle of their acceptability. The Response to Pins Scoping Opinion [EN010159/6.21] states the Highway Authority has been consulted over access points. However, these were only very broadly indicated in the initial consultation which confirmed the design standards to be used. Access points are therefore not currently agreed. In our previous consultation response, we queried why Ragnall is included in the barred routes as it is the signed HGV route to High Marnham, but this has not been fully explained within the Consultation Response [EN010159/APP/5.1]. Avoiding routes will automatically provide environmental benefit, but as it has not been considered under IEMA in the same way that all other links and routes have, this choice has not been justified. Excluding Ragnall requires an additional access onto the A57 within a 50mph speed limit, catering for circa 430 construction vehicles per day (in peak). This is likely to create delay on the Major Road Network, contrary to the assessment in Table 12.10 in Chapter 12: Transport and Access [EN010159/APP/6.12] and is likely to result in conflicts with a resultant highway safety risk. This access has therefore neither been justified nor its impact properly considered.	NCC were consulted on the access strategy at the outset of the project. Further discussions with NCC have been held and a further technical note is being prepared to assist the Council in reviewing the access option on the A57, including the preparation of a Stage 1 Road Safety Audit. NCC's concern relates to the proposed access junction located on the A57 (Gate A as noted in Figure 4 of Transport Assessment [APP-041]. The site access on the A57 (Gate A as noted in Figure 4 of Transport Assessment [APP-041] provides direct access into a significant development area for the Proposed Development and uses an existing agricultural access junction that appears to have also been possibly used for the construction of a telecommunications mast. The decision to avoid Ragnall removes construction traffic passing through the village and individual houses that are located in close proximity to Main Street. It also ensures that the proposed Abnormal Indivisible Load (AIL) traffic travels on the minimum necessary public roads and ensures that access for these movements is from a purpose designed junction. The existing A57 / Main Street junction is a four arm crossroads. It is considered that a three arm construction access junction is a more appropriate access for the Proposed Development, as this avoids traffic "hooking" movements between the two minor arms. The

Relevant Representation Number	Representation	Applicant Response
		Applicant will provide a Stage 1 Road Safety Audit to independently review the design of the proposed access junction.

Relevant Representation Number	Representation	Applicant Response
RR.154	Figure 4 of Transport Assessment [EN010159/APP/6.21] indicates the site access locations (gates A to J) and paragraph A12.3.37 states that prior to any construction works being undertaken within the limits of road adoption, the detailed design of these works must be submitted to the appropriate highway authority for approval. However, some details of the gates would need to be submitted as part of this process so the principal of their acceptability can be established. The response provided in Consultation Response [EN010159/APP/5.1] states that figures illustrating the junction layouts with visibility splays are provided in the Transport Assessment [EN010159/APP/6.21]. However, the drawings provided show the swept paths at the access intended for the Abnormal Load vehicles and do not show the accesses at each gate. The HA will need to see drawings showing all accesses, including details of the highway boundary, swept paths and the required visibility splays alongside any vegetation (hedgerows/trees) requiring removal as a minimum. These preliminary drawings should be accompanied by a Stage 1 Road Safety Audit to GG119.	Access drawings depicting the access bellmouth, visibility splays and vehicle swept path analysis are contained to the rear of the Streets, Rights of Way and Access Plans [APP-015]. At the request of NCC, a copy of the access plans is now appended to the updated Transport Assessment submitted at Deadline 1. □ In regard to the implementation of a Road Safety Audit, subject to the review of the proposed access designs, NCC has requested a Stage 1 Road Safety Audit at the A57 junction and one other location, following a review of the access junction plans.

Relevant Representation Number	Representation	Applicant Response
RR.154	Proper consideration has still not been given to the requirement for passing bays. Whilst Crabtree Lane is noted to have some passing places, it has not been determined that these are suitable or sufficient. Paragraphs A.12.5.18 and A.12.5.19 of Transport Assessment [EN010159/APP/6.21] suggest that both Polly Taylors Road and Moor Lane are circa 6m in width which is an overestimation, and their suitability to accommodate HGV traffic should be established with passing points identified if required. Gates E, J and I need to be considered with regards to this. It should also be confirmed if all accesses are to be made permanent for use during the operation phase. Paragraph A.12.3.39 of Transport Assessment [EN010159/APP/6.21] states that the access junctions will be metalled for the initial section to prevent debris being brought out onto the public road network with gates set back 15m. This does not accommodate the maximum legal length of an HGV and therefore this should be amended accordingly (a 25m setback would be recommended).	The Applicant notes the comment regarding Polly Taylors Road. The road however is a two-lane road with sufficient width for passing traffic to be accommodated without the need for additional passing places. There are currently no passing places or evidence of verge damage consistent with traffic trying to pass. The Applicant recognises the concerns raised and has sought to limit the number of construction vehicles that will navigate across Crabtree Lane with Table 4 of the Transport Assessment Report [APP-0411] noting that the construction traffic flow will consist of 6 Car & LGV and 8 HGV per day will be required during the peak of construction activity. Drawings illustrating passing place provision on Crabtree Lane have been prepared and are attached to the updated Transport Assessment. Table 4 of the Transport Assessment Report [APP-041] notes that Moor Lane that both of these access points will only generate a construction Peak Period Daily Traffic Flow of 3 Car & LGV and 9 HGV movements respectively. Therefore, the overall volume of construction traffic that will navigate on Moor Lane is considered to be low.

Relevant Representation Number	Representation	Applicant Response
		Drawings illustrating passing place provision on Moor Lane have been prepared and are attached to the updated Transport Assessment. The access gates located on Moor Lane will have limited construction vehicle movements due to internal access tracks permitting the majority of construction vehicle movements to be made within the site footprint, thereby minimising the number of interfaces of construction vehicles with local road users.

Relevant Representation Number	Representation	Applicant Response
RR.154	The collision data should be updated and included in the access considerations. A.12.5.27 of Transport Assessment [EN010159/APP/6.21] suggests that 'slight' accidents are damage only accidents. This is not the case. Slight accidents are injury accidents. Information submitted in relation to the accesses (above) should specifically consider any collisions in their vicinity and will need to consider the latest available data (as that provided is out of date). The latest accident information available covers 2024 and part of 2025 and can be obtained by emailing roadinjuryaccidentdata@viaem.co.uk	The accident data provided in Transport Assessment [APP-041] provides a view on accident trends. A revised review of the full 2024 data and part data from 2025 can be undertaken following discussions with NCC, assuming that there are further significant accident clusters within the study area road network.

Relevant Representation Number	Representation	Applicant Response
RR.154	Dilapidation Survey Consultation Response [EN010159/APP/5.1] states that the Applicant will engage with the relevant Highway Authorities separately regarding the need for any 'Wear and Tear' agreements. However, there is no reason why this should not be included in the Outline Construction Traffic Management Plan [EN010159/APP/7.9] or otherwise secured through this process and include details of a pre and post works highway condition survey with timescales for implementation of any repairs necessary alongside securing means for emergency repair works during the construction phase. After construction the Highway Authority require the highway and any road gullies within 500m either side of each access to be cleaned. This should also be included in the OCTMP and linked to the dilapidation survey to account for any post construction repair works.	The oCTMP [APP-181] at section 4.7 provides a framework through which a suitable Wear & Tear Agreement with NCC will be developed. As set out in the oCTMP, the condition of the roads will be agreed with County Councils prior to construction works commencing.

Relevant Representation Number	Representation	Applicant Response
RR.077	Transport and Access The majority of this proposed development is in Nottinghamshire and would be accessed from the Nottinghamshire County Council's road network. There are 3 access points in the Lincolnshire County Council area, namely Gates F, G, and H, with access for construction traffic being via the A57, A1133 and Roadwood Lane (Appendix 12.2 – Transport Assessment [APP-136]). The construction traffic has been estimated from first principles and the methodology (pages 12-30 [APP-136]) is acceptable. The impacts are summarised in Table 5 [APP-136] and show that the proposals would not cause a severe impact nor an unacceptable safety impact on the Lincolnshire County Council road network. Paragraph A12.3.38 [APP-136] confirms that the applicant would submit and pay fees for the Section 184 applications under the Highways Act needed for the new access points. Access Drawings (Street ROW Access Plans) [APP-024] for accesses 2, 3, 4 and 5 which are in Lincolnshire show layouts and swept paths. These layouts are acceptable in principle and the detail can be addressed at Section 184 stage.	The Applicant acknowledges the comment from Lincolnshire County Council that the assessment is suitable and agrees with the Council that no severe impacts or road safety issues will be caused. The Applicant acknowledges the comment from Lincolnshire County Council that the access layouts are acceptable in principle and will continue to work with the Local Highways Authority to ensure that detailed design of these access locations are discharged in line with any requirements.

Parish Councils

Relevant Representation Number	Representation	Applicant Response
Alternatives & Site Selection		
RR.050	Loss of Agricultural Land – The proposed site encompasses a substantial area of high-quality agricultural land that is currently used for food production. Notably, 54% of the land designated for the development is classified as Best and Most Versatile (BMV) agricultural land. The conversion of this land into an industrial-scale solar farm would undermine local and national food security efforts. National planning policy demands strong justification for the use of such land, and we believe this has not been adequately provided.	NPS EN-3 acknowledges that solar development is not prohibited on BMV land, and it is recognised that at scale, developments may use some agricultural land. During the site selection process, the use of BMV was considered by the Applicant using the Natural England predictive mapping. This shows large areas of the Order Limits as having a low-to-moderate likelihood probability of BMV. Similarly, the provisional DEFRA mapping showed that the majority of the land within the search area was Grade 3, with pockets of Grade 2 and 4. The site selection process resulted in the Order Limits being selected as a suitable site.

Relevant Representation Number	Representation	Applicant Response
		The Applicant has since taken further steps to avoid and minimise use of BMV land, however, there does still remain BMV land within the Site. The Applicant has set out its justification for this in the application documents. It is explained within Environmental Statement Volume 2, Chapter 4: Alternatives and Design Evolution [APP-033] that other potential locations were not of significantly better BMV profile in comparison to the Order Limits, resulting from detailed ALC survey. As the Order Limits have evolved, some land parcels of ALC Grade 2 have been removed in seeking to avoid and minimise impacts to BMV land. With complete avoidance of BMV land not possible in a way that still achieves the objectives of the Proposed Development, a key focus in the design of the Proposed Development was on minimising impacts on BMV as much as possible. To meet our national targets for solar energy would only require 0.3% of the total land in the UK, creating a minimal impact on food production.

Relevant Representation Number	Representation	Applicant Response
Biodiversity		
RR.017	Effects on wildlife	The potential effects of the Proposed Development on wildlife are assessed in Chapter 6 Biodiversity [APP-035].
RR.050	Environmental and Ecological Impact – The development risks causing irreparable harm to local wildlife, habitats, and biodiversity. Many of the proposed areas support a variety of species, and the transformation of this landscape into a solar farm would lead to habitat destruction and disruption of natural ecosystems. Notably, the project would result in a significant loss of habitat for deer and other wildlife. The limited reference to botanical interest and insufficient surveys for scarce plant species are also concerning.	The habitat surveys undertaken were those typically used to classify habitats for the purpose of planning: 1. Phase 1 habitat survey, with sufficient information gathered to translate results to the UK Habitats Classification; 2. Habitat condition assessment; 3. Hedgerow assessment (detailed survey focused on the most common habitat of principal importance present across the Order Limits). If scarce plants had been noted regularly, a further survey would have been proposed.

Relevant Representation Number	Representation	Applicant Response
Consultation		
RR.017	The lack of information from the developer on any proposed community benefit	From the first point of the project launch, the Applicant has committed to providing a community benefit fund, which would be developed through consultation with the community and local stakeholders. During the first phase of consultation, the Applicant asked a question about what the community would like to see in the community benefit fund. During the second phase of consultation, the Applicant provided more information about the items that had been requested for further feedback. This fund will continue to be developed in consultation with the community if the project is consented. During the pre-application period, the Applicant established a small benefit fund to support local initiatives in advance of the application decision. This fund has already allocated its first round of funding, and will continue to provide annual funding for another four years or until the decision is made.

Relevant Representation Number	Representation	Applicant Response
		The Applicant has also committed to working with local authorities and educational institutions to help ensure opportunities for new jobs created for the construction, operation and decommissioning of the Proposed Development are offered to seek to ensure benefits for local labour when possible, see the Outline Skills, Supply Chain and Employment Plan [APP-180].
RR.050	Lack of Local Benefit – While large-scale solar developments may contribute to national energy targets, the direct benefits to our local community remain unclear. Compared to other local NSIPs, the amount pledged to a community fund by One Earth developers is insignificant. We are concerned that the negative impacts far outweigh any potential advantages to South Clifton and its surrounding areas. We appreciate the opportunity to engage in this examination process and would welcome further discussion with you to outline our concerns in more detail.	From the first point of the project launch, the Applicant has committed to providing a community benefit fund, which would be developed through consultation with the community and local stakeholders. During the first phase of consultation, the Applicant asked a question about what the community would like to see in the community benefit fund. During the second phase of consultation, the Applicant provided more information about the items that had been requested for further feedback. This fund will continue to be developed in consultation with the community if the project is consented. During the pre-application period, the Applicant established a small benefit fund to support local initiatives in advance of the application decision. This fund has already allocated its first round of funding, and will continue to provide annual funding for another four years or until the decision is made.

Relevant Representation Number	Representation	Applicant Response
		The Applicant has also committed to working with local authorities and educational institutions to help ensure opportunities for new jobs created for the construction, operation and decommissioning of the Proposed Development are offered to seek to ensure benefits for local labour when possible, see the Outline Skills, Supply Chain and Employment Plan [APP-180].
RR.017	Lack of detail on the siting of aspects of the planned project	Guidance for consultation is that it should take place early in the project's development to ensure that feedback can be taken into consideration because major decisions have not yet been made. This means by default that final details will not be available until the very end of the process. Throughout the pre-application consultation, the Applicant explained that the design process would be iterative and that at each stage more details would be available for consultation.

Relevant Representation Number	Representation	Applicant Response
		For most components, including the locations of solar panels, substations and BESS units, the siting of each component of the Proposed Development is secured on the Works Plan [APP-023]. Within those areas, parameters would define the more precise locations of where components could be located. For example, the power conversion stations would be located no less than 100m from homes or 50m from public rights of way, unless they have acoustic mitigation. The final locations will be determined in the detail design, which would come after consent is granted.
RR.050	Unsatisfactory Consultation Process – South Clifton Parish Council along with many of our villagers, felt frustrated and ignored during the consultation process, with some leaving the open information events in tears. In particular, the residents whose homes are to be surrounded by 3.8m solar panels feel their concerns have not been heeded.	The pre-application consultation activities, as detailed in the Consultation Report [APP-151], show that the Applicant has provided well beyond the statutory requirements for consultation to ensure a meaningful community engagement built on respect. This includes two stages of consultation, as well as project updates throughout the development process. Engagement included a series of site visits to properties located particularly close to the project boundary from senior members of the project team to collect feedback, which led to significant changes in the project design, as detailed in the Design Approach Document [APP-171].

Relevant Representation Number	Representation	Applicant Response
	The applicant has always been vague about details, that to us are very important. The siting of the invertors, the number of BESS etc, has still has not been outlined. It is very difficult to comment meaningfully when you have not been provided with the full details.	As recommended in guidance and best practice for consultation, the Applicant consulted early in the project's development in order to ensure that feedback was able to be taken into consideration before key decisions had been made. This meant that at each stage of consultation the Applicant would be able to present more details on the siting of specific components due to the iterative nature of the development process. For most components, including the locations of solar panels, substations and BESS units, the siting of each component of the Proposed Development is secured on the Works Plan [APP-023]. Within those areas, parameters would define the more precise locations of where components could be located. For example, the power conversion stations would be located no less than 100m from homes or 50m from public rights of way, unless they have acoustic mitigation. The final locations will be determined in the detail design, which would come after consent is granted.
Cumulative Impacts		

Relevant Representation Number	Representation	Applicant Response
RR.017	Cumulative effects with other NSIP's and large-scale developments in the area	The Applicant has considered all included NSIPs throughout both counties of Lincolnshire and Nottinghamshire (beyond the ZOI), this includes Theddlethorpe Flexible Generation and North Lincolnshire Green Energy Park, following feedback from statutory consultation; this approach is above and beyond PINs guidance on cumulative effects. A Joint Report on Interrelationships will be submitted as part of the Examination. This will be submitted at Deadline 1.

Relevant Representation Number	Representation	Applicant Response
RR.050	Cumulative Impact of Large-Scale Energy Projects – This development must be considered in the context of other large infrastructure and energy projects in the region, including other NSIP solar farms and the STEP project at West Burton, as well as numerous applications to local council planning departments that are just under the size that determines an NSIP. The proposed 5km study area for cumulative effects is insufficient, failing to fully assess impacts on land use, BMV land, biodiversity, infrastructure, and community wellbeing. The cumulative impact, especially in terms of waste and resource pressures, has not been properly assessed, and waste management strategies for decommissioning remain worryingly vague.	The Applicant has considered all included solar NSIPs throughout both counties of Lincolnshire and Nottinghamshire (beyond the ZOI), following feedback from statutory consultation; this approach is above and beyond PINs guidance on cumulative effects (see ES Appendix 18.2: Other Development Long List Stages 1 and 2 [APP-146]). The 5km study area was an initial criterion and in used an early iteration of the long list at the scoping stage (see paragraph 18.3.13 of in ES Chapter 18: Cumulative Effects [APP-047]). As the Proposed Development progressed past the scoping stage, many developments beyond 5km were included as a result of consultation and the introduction of larger ZoIs from aspects. The cumulative waste assessment is carried out in Section 1.10 of ES Appendix 2.3: Materials and Waste Impact Assessment [APP-082]], and this assessment has a regional level and national study area for non-hazardous and hazardous waste respectively. These are both greater than 5km from the Proposed Development.

Relevant Representation Number	Representation	Applicant Response
		Decommissioning effects are assessed in paragraphs 1.9.22 to 1.9.28 of ES Appendix 2.3: Materials and Waste Impact Assessment [APP-082]. As stated in paragraph 1.8.6 of ES Appendix 2.3: Materials and Waste Impact Assessment [APP-082], "*The decommissioning of the Proposed Development will be subject to measures and procedures defined within a Decommissioning Environmental Management Plan (DEMP) secured by a Requirement in the DCO. An Outline DEMP is submitted with the DCO application which includes the approach for materials and waste management on-site (see Volume 7, Other Documents [APP-178]). The decommissioning contractor will use the Outline DEMP to produce their DEMP prior to decommissioning works on-site.*" Furthermore, the same approach to waste estimates was taken as the same nearby NSIPs for consistency, when information was not available. The worst-case approach was taken to ensure maximum impact was assessed.
DCO		

Relevant Representation Number	Representation	Applicant Response
RR.017	Accountability for the project in the future	If development consent is granted for the Proposed Development, the development consent order is a piece of secondary legislation, and it would be a criminal offence for the Applicant to be in breach of the requirements of the DCO. The draft DCO [APP-007] includes appropriate controls and requirements that the Applicant proposes are imposed on it, and they would need to comply with these. If it failed to do so, the local authorities could take enforcement action. Where appropriate and necessary, the Applicant has also built in monitoring and reporting requirements to ensure accountability.
Health		
RR.017	Human health, especially effects on mental wellbeing	The likely significant effects on human health (including physical activity; community identity, culture, resilience and influence; employment and income for vulnerable groups; climate change mitigation and adaption; electro-magnetic fields; wider societal infrastructure and resource; and health and social care services) are assessed in detail in Environmental Statement Chapter 16 Human Health [APP-045].

Relevant Representation Number	Representation	Applicant Response
		The Proposed Development has the potential to affect the way people feel about their community, through changes to the physical, economic, cultural or social landscape of the communities in the Local Study Area. During all three phases, there is the potential for a minor adverse (not significant) impact on community identity, culture, resilience and influence. The design of the Proposed Development has evolved in response to stakeholder feedback to embed sufficient mitigation into the proposals to avoid where possible visual changes to the landscape. This includes various setbacks to preserve key views and assets considered important by local communities, as well as offsets from individual properties. Adverse mental health effects are likely to be most pronounced at the beginning of the phase and gradually reduce over time as the population becomes more accustomed to the changes, in parallel with the establishment of the biodiversity enhancement measures and planting to screen low-level views.

Relevant Representation Number	Representation	Applicant Response
		The Applicant will facilitate continued open dialogue with local communities throughout the entirety of the operation and maintenance phase. A Community Liaison Officer will be appointed to lead discussions with local communities, and act as the primary point of contact should there be any queries or complaints. This can foster meaningful dialogue and improved outcomes for communities. To help mitigate the stress caused by uncertainty around the development process, the Applicant has communicated with the community regularly throughout the pre-application period, providing multiple newsletters to explain project updates and next steps. This engagement included meetings with parish councils and site visits to near neighbours to help answer key questions, understand key concerns, and update the proposals to address concerns where possible. Specific engagement activities and how feedback has resulted in changes to the Proposed Development are further described in the Consultation Report [APP-151] and the Design Approach Document [APP-171].

Relevant Representation Number	Representation	Applicant Response
		The Applicant has also pledged to provide community benefits to support the local community, including an initial fund that has already provided support for local projects. , the beneficial effects of the Community Fund will continue to support community resilience within the Local Study Area and the Wider Study Area over the long-term.
RR.050	A survey was conducted in the villages affected and over 400 returns (90% of villagers) were registered, of which 99% of residents objected to the planned solar farm. Of particular concern is the overwhelming feedback from over 100 local residents already reporting adverse mental health impacts directly linked to the proposal, including increased anxiety, low mood, and sleep disturbances. National Policy Statements, such as EN-1, state that the presumption in favour of NSIPs does not apply where there is an unacceptable risk to human health. We believe this threshold has been met.	We appreciate that there are concerns within the local community regarding the impacts of the Proposed Development on mental health. If communities and/or individuals feel as if they have not had full information on exactly how and when they will be impacted until the final ES has been completed, then this is likely to lead to a fear of the unknown, which can cause stress and anxiety. Engagement can actively alleviate particular impacts upon mental health, by providing a sense of control, inclusion and participation. A Community Liaison Officer will be appointed to lead discussions with local communities, and act as the primary point of contact should there be any queries or complaints. This can foster meaningful dialogue and improved outcomes for communities.

Relevant Representation Number	Representation	Applicant Response
		4.1.7 of EN-1 states that *'for projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety.'* Following mitigation, there are no significant adverse effects on human health anticipated.
Heritage		
RR.017	Cultural heritage, heritage and archaeology - especially the effect on listed buildings and community identity	The effect on listed buildings and the historic built environment is detailed in Chapter 10 [APP-039] and associated Appendices [APP-126 – APP-128]. To summarise, whilst there would be some harm to a small number of heritage assets, this has been effectively mitigated through good design, in consultation with the local authorities and Historic England.

Relevant Representation Number	Representation	Applicant Response
		The likely presence and potential importance of buried archaeological remains within the Order Limits has been ascertained by a comprehensive combination of assessment, which included DBA, Geophysical Survey, Lidar and Aerial Imagery assessment and a Geoarchaeological Deposit Model. A proportionate trial trenching evaluation has been carried to inform Chapter 9: Buried Heritage [APP-038], targeting areas of high archaeological potential identified as part of the wider assessment and in consultation with the Archaeology Advisory Teams to the LPAs and Historic England, and the areas where the potential impact of the Proposed Development is expected to be the highest. These have revealed some discrete locations where buried remains are present. The Environmental Mitigation discussed in Chapter 9: Buried Heritage [APP-038] Section 9.5 and whenever required industry standard archaeological mitigation measures will ensure that the Proposed Development will lead to no significant residual effects on buried heritage assets.

Relevant Representation Number	Representation	Applicant Response
		The Archaeological work undertaken in support of the DCO offers significant public benefits to encompass community engagement, education, and well-being. It will enhance the local community understanding of the past, fosters community identity, promotes social cohesion, and provide valuable insight on the history of the area in line with CIfA guidance.
RR.050	Insufficient Heritage and Archaeological Assessment – Historic England and Lincolnshire County Council have expressed concerns about the lack of adequate site-specific archaeological evaluation, particularly in areas with high archaeological potential. The absence of proper trial trenching and surveys could lead to irreversible damage to our cultural heritage. A search on find.org reveals that over 500 items have been found from the project area in recent times.	As part of the buried heritage baseline collection, the Archaeological Desk-Based assessment provided, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within the Order Limits. This considered all the available sources, including but not limited to Lincolnshire and Nottinghamshire Historic Environmental Records (HERs), a review of the information included in the Portable Antiquity Scheme (PAS), an assessment of remote imagery including aerial photographs and Lidar imagery, and historical maps.

Relevant Representation Number	Representation	Applicant Response
		The extent and scope of the targeted trial trenching evaluation is considered proportionate and appropriate, striking the right balance between providing the required evidence to inform the DCO application and limiting the impact on Buried Heritage Assets arising from any intrusive archaeological work. The Applicant considers that information submitted meets the requirements of the NPPF, NPS EN-1 and NPS EN-3, and provides an adequate baseline for the assessment of impacts including the potential for currently unknown archaeological remains. The trial trenching evaluation carried out to date has provided the required to define nature, extent, preservation and significance that will inform the archaeological mitigation strategy for the Proposed Development. This includes assessing the Project Design's capacity to address and accommodate any archaeological constraints that have been, or may in the future be, identified. This process also provided a better understanding of the buried heritage assets and demonstrated the substantial reliability of the non-intrusive assessments and evaluation carried out to inform the targeted trial trenching evaluation.

Relevant Representation Number	Representation	Applicant Response
		Where trial trenching evaluation was not undertaken in certain areas of the Order Limits it is not regarded as a limitation to the assessment. The impacts and any additional mitigation requirements in these areas can be adequately understood based on the data presented in the DBA and the results of the completed geophysical survey evaluation which, alongside the results of the trial trench evaluation of other areas, provide a robust basis for understanding the impacts and mitigation requirements of the Order Limits as a whole. The forthcoming Outline Written Scheme of Investigations (oWSI) will define the strategy to carry out additional trial trenching evaluation to evaluate the remaining of the 29 areas of archaeological potential identified in the DBA and by the geophysical survey. This will also inform the detailed design and mitigation for archaeological remains and this can be secured through draft DCO Requirements 12 [APP-007]. Mitigation for archaeological remains will either be through design changes to avoid impacts (micro siting / exclusion zones or use of non-intrusive foundations) or through excavation or archaeological monitoring where avoidance is not necessary or desirable.

Relevant Representation Number	Representation	Applicant Response
		Carrying out any further trial trenching evaluation as a pre-commencement requirement, will reduce the risk of any disproportionate harm to buried heritage deposits arising from a partial or total removal of assets as a consequence of the archaeological trial trenching investigation, to not be offset by the positive environmental effects of the Proposed Development. In consideration of the following: 1. CifA's Code of Conduct Principle 2 stating that "*the member has a responsibility for the conservation of the historic environment*," and Rules 2.1 stating that "*A member shall strive to conserve archaeological sites and material as a resource for study and enjoyment now and in the future, and shall encourage others to do the same. Where such conservation is not possible, they shall seek to ensure the creation and maintenance of an adequate record through appropriate forms of research, recording, archiving of records and other relevant material, and dissemination of results*", and Rule 2.3 stating that "*A member shall ensure that the objects of a research project are an adequate justification for the destruction of the archaeological evidence which it will entail*."

Relevant Representation Number	Representation	Applicant Response
		2. Paragraph 5.9.11 of the Overarching National Policy Statement for Energy (EN-1, 2024), stating that "*Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact*." 3. Paragraph 5.9.21 of the EN-1 stating that "*Where there is a high probability (based on an adequate assessment) that a development site may include, as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction*."

Relevant Representation Number	Representation	Applicant Response
		4. Paragraph 2.3.8 of the National Policy Statement for Renewable Energy Infrastructure (EN-3) stating that "In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target." The phased approach to assessment, utilising a suite of techniques to build upon and inform one another, is comparable with other DCO solar farm schemes. Large amounts of predetermination trenching are not supported by guidance or by the ethical principle of minimizing harm to the historic environment. In their reply, Historic England support an approach that minimizes unnecessary physical interventions to archaeological remains.
Hydrology & Hydrogeology		

Relevant Representation Number	Representation	Applicant Response
RR.017	Dunham and District Parish Council have concerns about the project as a whole, and are particularly concerned about the following areas that will affect residents of the parishes: ... Hydrology, flooding, and water management	The potential impacts on hydrology and hydrogeology have been assessed in Chapter 7 [AS-053.]. A Flood Risk Assessment (FRA) has also been completed [AS-051]. Chapter 7 concludes that with environmental measures incorporated, there will be no significant environmental effects in relation to hydrology and hydrogeology as a result of the Proposed Development. The FRA concludes that the Proposed Development would not increase flood risk at the Site or in the surrounding area, and would remain operational and safe during times of flood.

Relevant Representation Number	Representation	Applicant Response
RR.050	Flood Risk – A significant portion of the proposed development is located on a flood plain, including the Torksey water catchment area. The Environment Agency has raised concerns about the lack of quantitative analysis in the Preliminary Environmental Information Report and suggested hydraulic modelling to assess flood risk. The lifetime of existing flood defences must be reassessed in light of the project's 60-year duration. One Earth has chosen to build on this unsuitable land, necessitating solar panels as tall as 3.8m—a height designed to mitigate flooding issues that would not exist if the site selection had been appropriate. This compromises visual amenity and raises safety concerns, and we question why local residents should be expected to endure such inappropriate industrialisation.	Since the PEIR submission, a number of meetings have been held with the EA where the flood mitigation and approach to quantification was agreed and included within meeting minutes (refer to Appendix A3 of the FRA (AS-051)). With regards to the need for hydraulic modelling, this was discussed in meetings and post meeting discussions with the EA and agreed to. Please refer to Item 5.1.2 of the third meeting with the EA (Appendix A3 of the FRA) where it was indicated by the EA that quantified methods other than modelling could be used. There are a number of formal flood defences associated with the River Trent, which are predominantly in the form of raised embankments and are shown broadly to be in a fair to good condition in the vicinity of the Site. All defences within the Site boundary are classified in a fair to good condition.

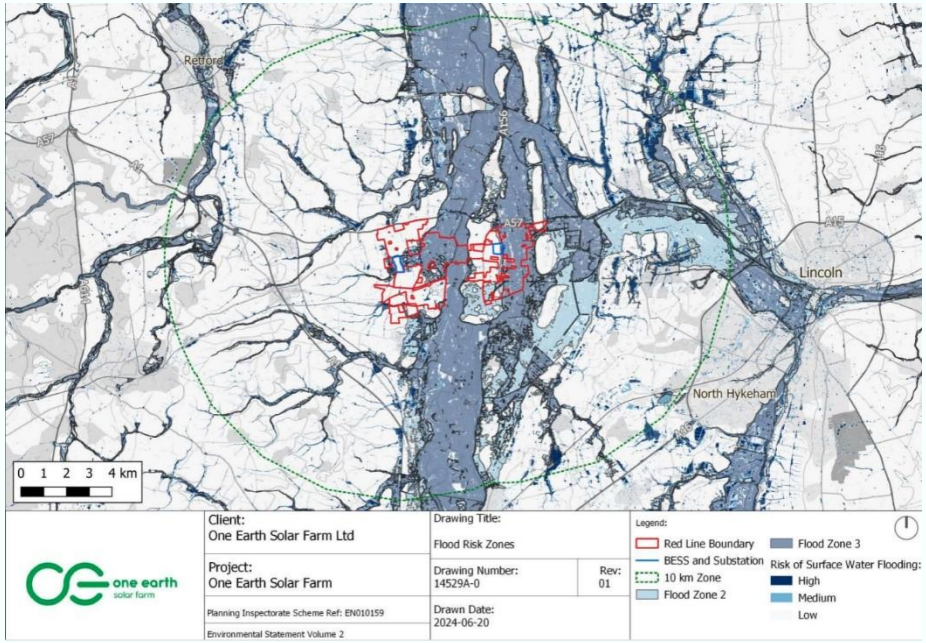
Relevant Representation Number	Representation	Applicant Response
		To ensure that impacts on the existing defences are minimised and that access is not restricted, significant offsets (minimum of 16m although in reality the offset is much greater) have been provided between the defences and any built development. It is understood that the EA conducts regular inspections and maintenance of these flood defences to ensure their continued effectiveness in mitigating flood risks. These inspections help to verify that the defences are capable of withstanding both current conditions and potential future challenges, such as the impacts of climate change and extreme weather events. Should the inspections indicate that repair works or remediation is required within the lifetime of the Proposed Development, this would be undertaken by the Applicant through consultation with the EA. Refer to Section 3.1.1 of the FRA (APP-095) for further information relating to the existing flood defences.

Relevant Representation Number	Representation	Applicant Response
		The Applicant has applied the sequential test for flood risk as part of site selection as required by paragraph 5.8.36 of the Overarching National Policy Statement for Energy (NPS EN-1). The way in which has been done is explained in Appendix 1 of the Planning Statement (Site Selection Report) [APP-168] and this is summarised below. In applying the sequential test, the Applicant has had regard to the relevant policy on alternatives in NPS EN-1. This includes that alternative sites should: • be identified in a proportionate manner (paragraph 4.3.22 of NPS EN1); and • deliver the same energy capacity in the same timescale (paragraph 4.3.23 of NPS EN1).

Relevant Representation Number	Representation	Applicant Response
		Paragraph 5.8.10 of NPS EN1 states that the sequential test should consider reasonably available, lower risk sites appropriate for the proposed development. If it does find these, it then needs to be justified why they are not proposed, where accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified. The Applicant's starting point was the grid connection at High Marnham substation which had available capacity to deliver a utility scale solar development. The Applicant then identified a 10km area of search from the point of connection (POC), which was informed by the maximum viable distance of the cable, although sites as close as possible to substation were preferred, in order to minimise the risk of environmental impacts, disruption to multiple landowners, challenges with crossings and process losses, and the cost and delay of a longer cable route.

Relevant Representation Number	Representation	Applicant Response
		The Applicant did not seek to actively identify a single site of a particular size but was led by landowner discussions to identify potentially available land, each site's suitability for solar arrays in terms of size and topography, and whether it was likely to have environmental effects that were, or could be made to be, acceptable. Much of the 10km search area is located with Flood Zones 2 and 3 – see Figure below.

Relevant Representation Number	Representation	Applicant Response



The Applicant carried out a thorough exercise of identifying appropriate land within the 10km search area. This search initially focussed on areas of lower flood risk.

Relevant Representation Number	Representation	Applicant Response
		The Applicant started their search in proximity to Ossington, approximately 10km south-west of the POC. There were no landowners within this area who were prepared to voluntarily put their land forward for solar development and so the Applicant continued their search. This is considered reasonable in the context of reducing the amount of land that would need to be acquired compulsorily. Notwithstanding that no willing landowners were found in the areas of lower flood risk to the south-west, this area was also not suitable for the Proposed Development for the following reasons, as explained Appendix 1 of the Planning Statement (Site Selection Report) [APP-168]: • Land towards the west is on higher ground than the central areas of the search area, and gives more expansive, open and distant views across the agricultural landscape. • There were areas of ancient woodland to the south-west and south-east which, whilst they could be avoided, made it more difficult to accommodate a utility scale solar farm.

Relevant Representation Number	Representation	Applicant Response
		• There are more clusters of listed buildings to the west, south-west and south-east of the 10km search area, which made it more difficult to find sufficient land that could accommodate a utility scale solar farm, whilst ensuring a satisfactory relationship with these designated assets. There are also significant conservation areas to the west and south-west in particular. • The Applicant sought to avoid ALC Grade 2 (based on Defra mapping) areas further west and south. In addition, the Natural England Likelihood of BMV Agricultural Land map showed that all of the land to the west beyond the Order Limits was predicted to have a moderate to high likelihood of BMV, with the greater likelihood as you move further west beyond East Markham, and so a greater impact on BMV was anticipated further west. • Further west the settlement pattern becomes more clustered and denser (around the larger settlements of Tuxford and East Markham for example) and was considered less suitable than the land closer to the point of connection because the landscape, visual and amenity impacts would be greater. • This is the same to the south-east of the search area with the settlement pattern making it more difficult to find sufficient areas of land that was an acceptable distance from people's homes.

Relevant Representation Number	Representation	Applicant Response
		• The area to the south-east of the 10km study area in Flood Zone 1 was very close to another utility-scale solar farm (Fosse Green) and the Applicant considered that the cumulative impact on communities would not be acceptable. On this basis, land at lower risk of flooding within the 10km search area was not considered suitable for the Proposed Development, or it was not reasonably available as landowners were not willing to put their land forward. The Applicant has carried out a systematic exercise of searching for suitable and reasonably available land throughout the search area. Having considered which areas may be potentially suitable for solar, the Applicant approached landowners, focussing on those areas at lower risk of flooding first.

Relevant Representation Number	Representation	Applicant Response
		After those areas in Flood Zone 1 were discounted for other environmental reasons, the Applicant approached landowners to the east of River Trent. They found a group of willing landowners with large areas of land (approximately 486 hectares combined), close to the POC which met the site selection criteria. These discussions then led to adjoining landowners and landowners on the west of the River Trent in close proximity to High Marnham substation being identified, which formed the initial scheme that was consulted on through the non-statutory consultation.

Relevant Representation Number	Representation	Applicant Response
		Whilst the Proposed Development has a significant proportion of solar panels located in Flood Zones 2 and 3, the BESS and substations have been sited such that their associated sensitive equipment can be located within Flood Zone 1 and no built development is included in Flood Zone 3b. There are some inverters located in Flood Zones 2 and 3 due to the size of the scheme. Where this is the case, the inverters will be raised above the design flood level on raised platforms, providing a freeboard of 300mm. To ensure that there will only be a negligible impact in floodplain storage, it is proposed that these features will have a voided structure beneath, allowing the flow and storage of floodwater beneath. Furthermore, the Applicant has agreed a technical solution with the Environment Agency which doesn't increase the risk of flooding on or off the site (refer to SOCG with the EA).

Relevant Representation Number	Representation	Applicant Response
		In addition, those areas within the Order Limits within Flood Zone 1 that are not proposed for solar development were discounted for other planning and environmental reasons that meant that they were not appropriate for solar development. This is set out in further detail in the Design Approach Document [APP-171]. This includes areas outside of Flood Zones 2 and 3 to the north and south of North Clifton and South Clifton which was removed from the areas which were being considered for solar panels on the basis of impact on local communities and also potential effects on designated heritage assets (including Church of St George the Martyr, Grade II*) and the experience of moving between the settlements along Church Lane. Further evidence on how the Applicant has complied with the sequential test for flood risk will be provided at Deadline 2. Following the application of the Sequential Test, the Applicant has also demonstrated that the Proposed Development complies with the Exception Test. The Proposed Development will provide the following and is therefore considered to have passed the Exception Test:

Relevant Representation Number	Representation	Applicant Response
		• Wider sustainability benefits to the community by delivering a new source of sustainable energy and supporting the energy sector with the provision of battery storage, • Biodiversity benefits through biodiversity net gain and environmental enhancements. • Flood risk mitigation measures within the design which demonstrate it would remain safe for its lifetime (including climate change) and will not increase flood risk. The FRA (APP-095) sets this out in further detail. Furthermore, the Sequential Test has been applied within the site as part of the design iteration process, and more vulnerable elements of the development have been sequentially located within the Order Limits, in areas of lower flood risk. The Planning Statement (APP-168) sets this out in further detail.

Relevant Representation Number	Representation	Applicant Response
		In relation to compromising visual amenity and resulting in safety concerns, as a result of panels being raised above the flood extent, visual amenity is addressed in Chapter 11 of the ES, Landscape and Visual [AS-017]. It is also noteworthy that NPS EN1 recognises at paragraph 5.10.5 that "*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape*". It is not quite clear what the safety concerns being referred to are, but in relation to flood risk, as noted above it has been demonstrated that the Proposed Development would remain safe for its lifetime (including climate change).

Relevant Representation Number	Representation	Applicant Response
RR.050	The Use of Drinking Water Protected Areas – these areas are a crucial part of the UKs' water management framework. By safeguarding these sources of drinking water, they help ensure the ongoing provision of safe, clean and affordable water to the public. The council feels that there is significant risk of pollution to these local DWPA from possible BESS fires and also buried cables, that are left in the ground during and after the life of the project, breaking down over time and leaving so many micro plastics that the root crops commonly grown in this area will never be grown again.	For clarity, the following are present within the Order limits or within the vicinity: • A Secondary aquifer across the majority of study area. • A Drinking Water Protected Area for Surface Water across the eastern area and portions of the western area. • Hall Water Reservoir/Water Treatment Works to the east of the River Trent, outside of the order limits. (Anglian Water) • Groundwater Source Protection Zones to the north, outside of the order limits. Although the above receptors could in theory be impacted by pollutants in surface water runoff or by pollutants that are mobilised during a flood event, mitigation measures are proposed to minimise this potential. This includes the following:

Relevant Representation Number	Representation	Applicant Response
		• The Hall Water Reservoir/Water Treatment Works is located in Flood Zone 1 and therefore would not be impacted by any potentially mobilised contaminants. • Although there are Source Protection Zones, drinking water protected areas for surface water and groundwater abstraction points located within Flood Zones 2 and 3, there are mitigation measures contained within the oCEMP (APP-176), oOEMP (APP-177) and oDEMP (APP-178), that are protective of water as a whole and will have the effect of protecting any groundwater or surface water that is abstracted. These measures include ○ The safe storage of materials ○ Use of containment measures for fuels and oils ○ Emergency spillage plans ○ Designated areas for mixing and handling materials ○ Management of site runoff

Relevant Representation Number	Representation	Applicant Response
		○ Protocols for is suspected contaminated material is encountered The mitigation measures that protect groundwater and surface water will ensure that there is no significant deterioration in quality of water resources during the lifetime of the Proposed Development. With regards to potentially polluted surface water runoff from the operational site, a drainage strategy to manage runoff from the battery storage and sub-station areas has been set out within Section 4 of the FRA (AS-051) and includes the following measures: • Detention basin have been sized to accommodate the 100 year plus 40% climate change storm event and have been located outside of the design flood risk extent, minimising the potential for mobilisation of contaminants.

Relevant Representation Number	Representation	Applicant Response
		• There will be no infiltration of surface water runoff from the battery storage/sub-station areas as an impermeable lining is included to prevent infiltration and potential contamination to groundwater. • Suitable SuDS features, including permeable surfacing and detention basins are included for treatment of runoff from bess and substation areas prior to discharge to any watercourses. • Fire suppression has been considered and should this occur, a penstock valve downstream of the basin will be automatically triggered to isolate potentially contaminated discharges and prevent discharge to surrounding watercourses. Should this occur, contaminated water would be tankered away and treated accordingly off-site. • Furthermore, the potential for a fire to occur at the same time as a rainfall event has been considered and the basins have therefore been sized to provide sufficient storage to attenuate the 1 in 10 year event plus 228m3 of firewater (based on firefighting at 1,900 l/minute for 2 hours), with no discharge.

Relevant Representation Number	Representation	Applicant Response
		The Solar PV Site will be reinstated in accordance with the Outline Decommissioning Environmental Management Plan (oDEMP) [APP-178]. As detailed in the oDEMP [APP-178], cables left in situ after decommissioning would not impact the future agricultural use of the land, provided they were buried at a minimum 0.9m depth. Cables buried at least 1m below ground are expected to be left in place, and that approach is based on the Applicant's understanding (informed by use of cabling elsewhere and the approach taken on other similar schemes) that these cables would be unlikely to be considered as waste if left in the ground. The approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development.

Relevant Representation Number	Representation	Applicant Response
		However, recognising that industry practice and legislation may change by the time of decommissioning, the Applicant has made clear in the oDEMP that the approach will be confirmed at the time of decommissioning, based on government policy and best practice. Paragraph 1.1.6 of the oDEMP provides: "*The mode of cable decommissioning for the grid connection and other underground cables will be dependent upon government policy and best practice at that time. Currently, the most environmentally acceptable option is leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open cut the entire length of the cable route.*"

Relevant Representation Number	Representation	Applicant Response
		This current approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. The DEMP will need to be approved by the relevant planning authority pursuant to requirement 20 of the draft DCO, and the relevant planning authority would need to consult with both the Environment Agency and Natural England as part of the approval of the DEMP, meaning that there is the mechanism in place to ensure the EA has the opportunity to input to the approach at the time of decommissioning.
Masterplanning, Landscape & Visual Impact and Glint & Glare		

Relevant Representation Number	Representation	Applicant Response
RR.017	-How the project will alter the character of the public rights of way in the area. -Far Hill Lane public right of way application	The Landscape and Visual Impact Assessment [AS-017] details the impact of the Proposed Development on Public Rights of Way. Minimising such impacts has been a consideration from the outset of the project and has been achieved through securing buffers of at least 15m between a Public Right of Way to the first proposed solar panel. In many instances this distance is exceeded, in places measuring in more than 150m. Whilst Far Hill Lane is not a Public Right of Way, land to the southern side of the lane (leading from the east) is not within the Order limits and therefore would not change. An offset and new planting has been incorporated to the north of the land, and to the western part of the southern side, to reduce the visual impact experienced by current, and potential future, users of the route. These offsets measure between 12-15m to the closest solar panel.
RR.017	Landscape and visual effects	Landscape and visual effects are detailed within the Landscape and Visual Impact Assessment [AS-017].

Relevant Representation Number	Representation	Applicant Response
RR.050	Impact on Residents and Local Amenity – The scale and nature of the proposed development will significantly alter the character of our rural community.	Protecting features that are important to the local community and protecting and enhancing places of value are two of the projects Design Principles, as set out in the Design Approach Document [APP-171]. The iterative design process undertaken throughout the pre-application phase has responded to consultation and environmental surveys to minimise the impact on local villages. Such changes have included, but are not limited to: • Inclusion of a 200m offset east of Ragnall; • Siting the proposed solar panels over the crest of rising landform west of Ragnall; • Embedding a 50m offset from Main Street, south of Ragnall; • Removal of 40 acres of solar panels to retain a visual connection between Fledborough and Fledborough Viaduct; • A 150m offset from 'Access Road to Fledborough'; and • Removal of all proposed solar panels between North Clifton and South Clifton.

Relevant Representation Number	Representation	Applicant Response
		Further measures to reduce the scale and perception of the project are detailed in the Design Approach Document [APP-171].
Noise		
RR.017	Noise from the project in an otherwise tranquil area	Noise impacts have been considered throughout the lifespan of the project, as set out in Chapter 15 [**APP-044**]. During construction, these impacts would be temporary. Operational noise has been assessed in detail in Appendix 15.4 [**APP-142**], which identifies that operational noise has the potential to lead to significant effects if unmitigated. Since the precise details of noise mitigation cannot be provided at the present time, an operational noise limit has been proposed within the draft DCO ([**APP-007**], Schedule 2, Requirement 16), which would require operational noise to be controlled to appropriate levels and would therefore avoid significant operational noise impacts.
Safety		

Relevant Representation Number	Representation	Applicant Response
RR.017	Battery energy storage systems safety and fire-fighting response	The applicant is working with both Lincolnshire and Nottinghamshire FRS to agree via Statements of Common Ground a suitable approach to risk management of the BESS, centring around fire risk. This will consider NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems" at a minimum.
RR.050	The council feels that there is significant risk of pollution to these local DWPA from possible BESS fires and also buried cables, that are left in the ground during and after the life of the project, breaking down over time and leaving so many micro plastics that the root crops commonly grown in this area will never be grown again.	Consideration of polluted runoff from a fire within the BESS areas has been made within the surface water drainage design. Firstly, the SuDS features serving these areas will have an impermeable lining to impede the infiltration of potential contaminants to the ground and groundwater. Should a fire occur and the fire suppression system is activated, a penstock valve downstream of the attenuation basins will be automatically triggered to isolate potentially contaminated discharges to the surrounding watercourses. Should this occur, contaminated water would be retained within the basins and tankered away.

Relevant Representation Number	Representation	Applicant Response
		Furthermore, the potential for a fire to occur at the same time as a rainfall event has been considered and the basins have been sized to provide sufficient storage to attenuate the 1 in 10 year event plus 228m^3 of firewater (based on firefighting at 1,900 l/minute for 2 hours), with no discharge. The Flood Risk Assessment [APP-095] sets the above out in further detail. The Solar PV Site will be reinstated in accordance with the Outline Decommissioning Environmental Management Plan (oDEMP) [APP-178] As detailed in the oDEMP [APP-178], cables left in situ after decommissioning would not impact the future agricultural use of the land, provided they were buried at a minimum 0.9m depth. Cables buried at least 1m below ground are expected to be left in place, and that approach is based on the Applicant's understanding (informed by use of cabling elsewhere and the approach taken on other similar schemes) that these cables would be unlikely to be considered as waste if left in the ground.

Relevant Representation Number	Representation	Applicant Response
		The approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. However, recognising that industry practice and legislation may change by the time of decommissioning, the Applicant has made clear in the oDEMP that the approach will be confirmed at the time of decommissioning, based on government policy and best practice. Paragraph 1.1.6 of the oDEMP provides: "*The mode of cable decommissioning for the grid connection and other underground cables will be dependent upon government policy and best practice at that time. Currently, the most environmentally acceptable option is leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open cut the entire length of the cable route.*"

Relevant Representation Number	Representation	Applicant Response
		This current approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. The DEMP will need to be approved by the relevant planning authority pursuant to requirement 20 of the draft DCO, and the relevant planning authority would need to consult with both the Environment Agency and Natural England as part of the approval of the DEMP, meaning that there is the mechanism in place to ensure the EA has the opportunity to input to the approach at the time of decommissioning.
Socioeconomics		
RR.017	Socio-economic impacts	Socio-economic impacts of the project during construction, operation and decommissioning are considered in ES Chapter 17 – Socio-Economics [APP-046].

Relevant Representation Number	Representation	Applicant Response
RR.050	Negative Impact on Local Tourism and Businesses – South Clifton and its surrounding areas attract visitors seeking a peaceful rural retreat. The industrialization of this landscape will deter tourists and impact local businesses, including Airbnb's and hospitality providers that rely on the area's natural beauty and tranquillity. Visitors love to stay here while exploring the city of Lincoln and historic Newark, and the proposed development threatens to diminish the area's appeal and the income from this.	The assessment presented in ES Chapter 17 – Socio-Economics [APP-046] considers the potential significant effects on tourism arising from the construction, operation and decommissioning of the Proposed Development. Potential effects on tourism would be expected to arise primarily because of impacts on amenity; namely, visual, noise and dust/air quality impacts on amenity, which are assessed in the respective ES chapters (ES Chapter 11 – Landscape and Visual [APP-040], ES Chapter 15 – Noise and Vibration [APP-044] and ES Chapter 13 – Air Quality [APP-042]). The noise and vibration and air quality assessments both concluded that there would be no significant effects on amenity, and while the landscape and visual assessment did identify some significant effects many are mitigated by the embedded environmental measures. For further information on how these measures are secured and design principles have been adopted, see: • APP-171: Design approach document • APP-176: Outline Construction Environmental Management Plan • App-177: Outline Operational Environmental Management Plan

Relevant Representation Number	Representation	Applicant Response
		• App-178: Outline Decommissioning Environmental Management Plan • APP 179: Outline Landscape and Ecology Environmental Management Plan • APP 181: Outline Construction Traffic Management Plan • APP 186: Outline Public Right of Way Management Plan. More generally as discussed in ES Chapter 17 – Socio-Economics [APP-046], the effects on tourism of solar developments are not straightforward. A study on the 'Impacts of Renewable Energy Farms on Visitors to Cornwall' presents the results of a survey amongst 1,007 people at six locations across Cornwall to ascertain views on the presence of solar (and wind) farms and their effect on likelihood of visit. In response to the question "How does the presence of wind farms and solar farms in Cornwall affect the likelihood of you visiting the county again in the future (1,003 responses): 2% responded that they make me less likely to visit; 4% that they make me more likely to visit; 94% they make no difference in my decision to visit again in the future. Other factors such as weather and cost had a larger impact.

Relevant Representation Number	Representation	Applicant Response
		It is recognised, however, that any reduction in visitor numbers could have knock-on effects on local businesses, such as accommodation and hospitality providers, however the various mitigation measures set out in the ES alongside the potential temporary demand for services from construction workers would be expected to mitigate these impacts in the short-term, and the temporary nature of the construction works would likely ensure there are no significant effects in the longer term.
Transport & Access		
RR.017	Construction traffic and access	The potential impacts on traffic during the project's construction period have been assessed in Chapter 12 [APP-041]. No long term or significant traffic impacts are predicted as a result of the Proposed Development. These are detailed in Table 12-10 of Chapter 12 Transport and Access [APP-041].

Relevant Representation Number	Representation	Applicant Response
RR.050	increased traffic during construction, and potential for long-term disruption will negatively affect the quality of life for residents.	The potential impacts on traffic during the project's construction period have been assessed in Chapter 12 [APP-041]. No long term or significant traffic impacts are predicted as a result of the Proposed Development. These are detailed in Table 12-10 of Chapter 12 Transport and Access [APP-041].

Stat Consultees

Relevant Representation Number	Representation	Applicant Response
Air Quality		
RR.063	Control of emissions from Non-Road Going Mobile Machinery (NRMM)	Measures to control emissions from NRMM, such as minimum emissions standards and the equipment specifications to be used will be described and secured in the CEMP. At this stage, the CEMP is in outline. Prior to construction, the final measures will be agreed upon with the council and a final CEMP submitted, as per Requirement 13 of the Draft DCO [APP-007]. The specific requirement for machinery to meet the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended) has been included in the oCEMP submitted at Deadline 1. Likewise, machinery can be registered for inspection by the appropriate Competent Authority if required (in London there is a dedicated online register for registering site plant for example).

Relevant Representation Number	Representation	Applicant Response
	Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority. This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support LPAs and developers in improving and maintaining local air quality standards and support their net zero objectives.	

Relevant Representation Number	Representation	Applicant Response
	We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority. The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit. Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.	
Alternatives & Site Selection		

Relevant Representation Number	Representation	Applicant Response
RR.060	Finally, NPS EN-3 notes the upper limit of ground mounted solar development is normally 40 years. JG Pears Group therefore query why the OESF DCO is for a 60 year consent. This significant increase in the lifetime of the proposed development (50% longer than is the normal limit) will leave the impacts with the local community for over a generation. This significant increase in impacts is important when considered against the efficiency of the solar panels, which decreases over time.	The Applicant is seeking a 60-year consent, which is consistent with other similarly sized solar projects including consents granted for Cottam, West Burton, Gate Burton and Mallard Pass solar farms, which have all been granted 60-year consents. It's important to be clear that EN-3 para 2.10.65 states that "*An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time periods of operation"* and does not impose or suggest a 40-year limit is required. This would allow for solar panels to be replaced or repaired within the life of the Proposed Development which is allowed for within the draft Development Consent Order providing the maintenance of the Proposed Development does not result in effects that are worse that our Environmental Statement.
Biodiversity		
RR.063	Topic Fish Species Document Reference	A Fish Habitat Survey has been completed in 2025 (site survey in April and June 2025). This information, alongside other information on fish (other than lampreys) will be included within an updated version of Chapter 6 – Biodiversity [APP-035] provided at Deadline 1.

Relevant Representation Number	Representation	Applicant Response
	Environmental Statement; Ch 6 – Biodiversity; paragraphs 6.10.4 – 6.1.10 Issue Reference EAFBG-001 Issue The EIA has only assessed river lamprey and sea lamprey. Impact	As part of the update the potential effects on the fish species listed by the Environment Agency will be included for completeness.

Relevant Representation Number	Representation	Applicant Response
	There are records in the River Trent of populations of Atlantic salmon (Salmo salar), brown/sea trout (Salmo trutta), European smelt (Osmerus eperlanus), allis shad (Allosa allosa), twaite shad (Allosa fallax), European eel (Anguilla anguilla) and notable coarse fish, including barbel (Barbus barbus). By not including all fish in the baseline, impact-pathways may cause damage to fish or habitat. Solution Include all fish species present in the River Trent in the EIA Additional Comments	

Relevant Representation Number	Representation	Applicant Response
	Twaite and allis shad and Atlantic salmon are an Annex II species of the Habitats Directive. European smelt and brown/sea trout are listed as a S41 Priority Species of the NERC (Natural Environment and Rural Communities) Act. European eel are listed as critically endangered on the IUCN Red List of Threatened Species, they are also listed as a species of principal importance under Section 41 of the Natural Environment and Rural communities (NERC) Act 2006. They are also protected under The Eels (England and Wales) Regulations 2009. Barbel are an Annex V species of the Habitats Directive. Note that EMF impacts on additional fish species is detailed in Appendix 2.4: Electromagnetic Fields Impact Report.	
RR.063	Topic Fish Species Document Reference Appendix 6.3: Extended Habitat Survey; Table 3-1 Issue	A Fish Habitat Survey has been completed in 2025 (site survey in February and June 2025). This information, alongside other information on fish (other than lampreys) will be included within an updated version of Chapter 6 Biodiversity [APP-035] provided at Deadline 1.

Relevant Representation Number	Representation	Applicant Response
	Reference EAFBG-002 Issue Protected fish species are not included in this table. Impact The baseline for protected fish species has not been included which suggests that impacts on fish are not fully assessed. Solution A number of protected fish species are present, as per the comment above and have legal protection. The extended habitat assessment should be updated with habitat suitable for fish species. Note that the River Trent protect fish species are listed in 3.13.2, but this should also include other watercourses on site and be stated in Table 3-1 for consistency.	As part of the update the potential effects on the fish species listed by the Environment Agency will be included for completeness.
RR.063	Topic Fish Species	Appendix 6.3 Ecology Desk Study [APP-086] will be updated with data from the EA Ecology & Fish Data Explorer at Deadline 1.

Relevant Representation Number	Representation	Applicant Response
	Document Reference Appendix 6.2: Ecology Desk Study Issue Reference EAFBG-003 Issue No fish species are included in the desk study. Impact The baseline for fish species has not been included which suggests that impacts on fish are not fully assessed Solution The desk study should include fish species. Freely available EA fish survey data is available at EA Ecology & Fish Data Explorer.	

Relevant Representation Number	Representation	Applicant Response
RR.063	Topic Biodiversity Net Gain – Habitat Management Document Reference 6.21 Appendix 6.10 Biodiversity Net Gain Assessment – Table 4.8 Issue Reference EAFBG-004 Issue Lack of detail on the creation and management of habitats through BNG processes. Impact Potential for habitat to be incorrectly managed over time or to be designed in such a way that they fail to meet the forecasted post-development condition.	The Applicant acknowledges that a detailed Habitat Management and Monitoring Plan (in the Natural England template) will be required to ensure that there is sufficient email to guide the creation, enhancement and management of habitats in the short, medium and long terms. Currently the application documents include outline information both within Chapter 6 Biodiversity [APP-035] and within the Outline Landscape and Ecological Management Plan (oLEMP) [APP-179]. Requirement 8 of the Draft DCO [APP-007] secures that prior to the commencement of the Proposed Development, a LEMP must be submitted to and approved by the relevant planning authority in consultation with the Environment Agency and Natural England. In Chapter 6 Biodiversity [APP-035] environmental measure environmental commitment C35 (in Table 6.6) explains how the HMMP is secured via Requirement 9 of the Draft DCO [APP-007]. An update to the Outline Landscape and Ecological Management Plan (oLEMP) [APP-179] at Deadline 1 will describe how the LEMP, BNG Strategy and HMMP will work together during delivery. The level of detail provided reflects the design stage of the Proposed Development at this stage of the project.

Relevant Representation Number	Representation	Applicant Response
	Solution All habitat included in BNG assessments will require a HMMP to maximise the potential for the habitat to reach it's intended type and condition.	Should a DCO be granted, part of the detailed design stage would include developing more detailed habitat creation, implementation and management measures. This would be informed by the design of the infrastructure, information on soils (particularly levels of nutrients) and discussions with stakeholders such as the Internal Drainage Board. Ultimately, the detailed HMMP would need to be discussed and formally agreed with relevant local planning authorities, thereby ensuring it is fit for purpose. The level of information currently provided is commensurate with that of other consented Nationally Significant Infrastructure Projects at the application stage. Therefore, we will seek to agree this approach with the Environment Agency.

Relevant Representation Number	Representation	Applicant Response
RR.063	Topic Biodiversity Net Gain – Metric Calculator Document Reference 6.21 Appendix 6.10 Biodiversity Net Gain Assessment – Fig 4.1 & 4.3 Issue Reference EAFBG-005 Issue BNG map does not contain enough detail to reference habitats described within the report. In addition, no BNG metric calculator is supplied as part of application. Impact Unable to assess individual land parcels and particularly river units on their condition. As an example, 18.25km of ditches are mentioned in 6.10.59, but there is no way to determine if all ditches have been accounted for, which lengths of ditch are at what condition and what the impact or opportunities for enhancement may be.	The completed Statutory Biodiversity Metric for the Project has been submitted for consideration by stakeholders. The metric has been completed using Natural England's GIS import tool and therefore, there is not an individual line in the metric for each habitat parcel present. One of the reasons for this is that the scale of the project means that without the GIS import tool combining areas of the same habitat type and condition the outcome could not be provided in a single spreadsheet as the Statutory Biodiversity Metric is restricted to 248 lines only. The Applicant will seek to discuss and agree with the Environment Agency that there is sufficient information provided with regards BNG. As part of this a separate watercourse map will be provided within the Appendix 6.10 Biodiversity Net Gain Assessment [APP-093] showing the location of all ditches and watercourses with appropriate colours to differentiate those in different habitat condition.

Relevant Representation Number	Representation	Applicant Response
	Solution BNG metric calculator and correctly annotated map should be provided for interpretation.	
RR.063	Topic Biodiversity Net Gain - Watercourses Document Reference 6.21 Appendix 6.10 Biodiversity Net Gain Assessment – Table 4.8 - Post-development inputs to the Statutory Biodiversity Metric (watercourses) Issue Reference EAFBG-006 Issue There is a lack of clarity regarding watercourse included within the metric. They are not defined or marked on a map using target notes. This raises concerns that some watercourses may have been missed or potentially classified as ditches.	The River Trent was included in the BNG calculations. This inclusion is confirmed within an updated version of Appendix 6.10 Biodiversity Net Gain Assessment [APP-093] at Deadline 1.

Relevant Representation Number	Representation	Applicant Response
	Impact It cannot be demonstrated that the river elements of the site within the red line boundary have been considered. Solution Provide greater clarity on river elements of the BNG assessment, particularly the location of features. The River Trent should be included in BNG assessment and other watercourses if deemed appropriate. Provide proposed development increase through detailed design stage. Additional Comments The River Trent appears to be located within the order limits of the site and the BNG report does not provide assessment of the River Trent watercourse or post development scenario values to demonstrate 10% gain for this feature.	

Relevant Representation Number	Representation	Applicant Response
RR.063	Topic Culverting Document Reference 6.21 Appendix 6.10 Biodiversity Net Gain Assessment – Table 4.8 - Post-development inputs to the Statutory Biodiversity Metric (watercourses) Issue Reference EAFBG-007 Issue Use of culvert as habitat type in post development scenario is not appropriate. Although this is presented as a cautionary approach, it does not accurately reflect the proposal. Impact This likely reduces the opportunity for improving conditions in these sections of watercourse as the watercourse will be considered a culvert.	Culverts were included within the Statutory Biodiversity Metric as a precaution. During the detailed design phase the Statutory Biodiversity Metric will need to be updated. This will include representing clear span bridges more accurately within the Statutory Biodiversity Metric. It is noted that this change will be positive in terms of the level of BNG being provided (although it will be minimal given the extent of the clear span bridges needed).

Relevant Representation Number	Representation	Applicant Response
	Solution Provided updated post-development river metric proposed values at detailed design stage.	
RR.063	Topic Otters and Water Voles Document Reference EN010159/APP/6.21 Issue Reference EAFBG-008 Issue Although provision for mammal access in ditches is provided. There is no detail provided on issues identified in comments provided on the entrapment of otter or water vole in excavations or construction compounds during construction phase.	Chapter 6 Biodiversity [APP-035] includes environmental measure C14 which covers entrapment of animals within excavations.

Relevant Representation Number	Representation	Applicant Response
	Impact Impact on protected species through entrapment can include injuring or killing. This would constitute an offence and may impact the meta population of the species, particularly with reference to otter who have large ranges. Solution Secure and appropriate fencing of all construction compounds and the covering of any trenches overnight. A 10m buffer zone between all watercourses and any construction or development will protect otter, their habitats and allow free passage.	
RR.063	Topic Water Voles Document Reference ES Volume 3, Appendix 6.7: Badger, Otter and Water Vole Baseline [EN010159/APP/6.21].	The indicative design (including location of watercourse crossings) takes account of the water vole survey results. Clear span bridges (environmental measure C7) are specified to reduce impacts on fauna that may be using the ditch system (including water vole). Environmental measures C21, C22 and C23 are all aimed at improving habitat for water vole in the short to long term thereby allowing distribution and number to increase.

Relevant Representation Number	Representation	Applicant Response
	Issue Reference EAFBG-009 Issue Need to consider Water Vole locations and population density when undertaking crossings etc. BNG delivery habitats such as ponds or alterations to watercourses should take into account options for water vole habitat improvement. Impact Potential for significant impact as well as lost opportunities for retention and enhancement of aquatic mammal species. Solution Utilise otter and water vole survey data with proposed crossing maps to ensure there is adequate avoidance or mitigation. Consider the need for licensing once assessment has been undertaken.	However, a new environmental measure (C38 in Table 6.6) will be added in an updated version of Chapter 6 Biodiversity [APP-035] at Deadline 1 to make it clear that further survey for water vole will take place to inform detailed design and to enable (should it be necessary) a licence from Natural England to be applied for.

Relevant Representation Number	Representation	Applicant Response
RR.063	Topic Biosecurity Plan Document Reference EN010159/APP/6.6 Issue Reference EAFBG-010 Issue Biosecurity plan required 6.6.57 - A number of INNS plant species have been identified within the order limit. Impact It is essential that through the planned works, these are not distributed further or new invasive species are brought to the site through materials, plant or PPE.	The identification and control of invasive species would usually be controlled through the Construction Environment Management Plan. Environmental measure C14 in Chapter 6 Biodiversity [APP-035] will be updated to explicitly allow for updated survey and control of invasive non-native species. Invasive non-native species that occur during the operational phase would be covered by a detailed Habitat Management and Monitoring Plan that would be developed post consent. The target condition criteria for the majority of habitats require invasive non-native species to be controlled to deliver the BNG proposed.

Relevant Representation Number	Representation	Applicant Response
	Solution A biosecurity plan or the construction and operation phase of the development should be developed. It is also strongly advised that an INNS monitoring and eradication plan is developed and delivered. This will help prevent future spread and avoid potential costs on future operation and impact upon post development BNG unit value.	
RR.063	Topic Ecological Surveys Document Reference Appendix 6.7: Badger, Otter and Water Vole Baseline Issue Reference EAFBG-011 Issue A.6.2.7 Water vole survey was undertaken in mid-October outside of optimal survey season.	The survey period for water vole typically runs from mid-April to the end of September. Appendix 6.7: Badger, Otter and Water Vole Baseline details that two survey visits were undertaken one in May 2024 and one in mid-October [APP-090]. It is notable that all signs of water vole activity observed were recorded in October. The Water Vole Conservation Handbook (Dean et al. 2016) notes that there are seasonal variations in recording periods dependent on location, for example '*In south-east England the season is longer – March to October (or even longer during periods of good, stable weather)*'.

Relevant Representation Number	Representation	Applicant Response
	Impact Unable to determine likely impact of species due to potential for survey to be invalid. Additional information is required. Solution Currently all field signs are grouped in a map (Figure 3.4). A map detailing the locations of water vole split by survey season and a statement from the ecologist detailing survey conditions should be provided to allow assessment of the validity of this second survey.	Surveys were carried out on the 16th, 17th and 18th October 2024. On the 16th the average minimum temperature overnight was 12 degrees Celsius and maximum daytime temperature 18 degrees; on the 17th was 12 degrees Celsius and maximum daytime temperature 18 degrees and on the 18th was 7 degrees Celsius and maximum daytime temperature 15 degrees. Given that the average minimum and maximum temperatures for the area during October are typically 8 degrees and 14 degrees it would be reasonable to note that temperatures were above average. Therefore, it is likely that water voles remained active and could be recorded (as they were during the October survey visit). Therefore, the Applicant considers that the results of the water vole survey are robust and will seek to agree this with the Environment Agency within a Statement of Common Ground.

Relevant Representation Number	Representation	Applicant Response
RR.063	Fisheries The Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales) Regulations 2009 have not been included in the list of legislation that is relevant to biodiversity. The legal responsibility on the developer pertaining to this fish specific legislation has not been considered. Both pieces of legislation should be listed as relevant in the biodiversity chapter of the ES and submitted as part of the DCO Parts of The Salmon and Freshwater Fisheries Act 1975 relevant to this type of development and that should be considered, are (but not exhaustive) Part 1, Sections 2 and 4. Parts of The Eels (England and Wales) Regulations 2009 relevant to this type of development and that should be considered, are (but not exhaustive) Part 4.	A Fish Habitat Survey has been completed in 2025 (site survey in February and June 2025). This information, alongside other information on fish (including referencing appropriate legislation) will be included within an updated version of the Chapter 6 Biodiversity [APP-035] for submission at Deadline 1.
RR.063	Sustainable Drainage Systems SUDS should be built and managed using best practice and with consideration of the potential occupation of water vole, otter and other protected species. Management should be considered in the long term	Agreed – Environmental measure C-21 (see Table 6.6 Chapter 6 Biodiversity [APP-035]) ensures that sustainable drainage features will be designed to enhance biodiversity, including providing habitats that could be used by water vole and otter.

Relevant Representation Number	Representation	Applicant Response
RR.063	Open Span Bridges Section 6.10.119 states a commitment to open span bridges. However, table 4.8 of the BNG report describes the use of reinforcement which will impact the bankside habitat. This will need clarifying. There is a need to ensure the BNG report and assumptions within it reflects the wider biodiversity and ecology documentation provided.	The Biodiversity Net Gain assessment [APP-093] has used culverts to represent a worst-case scenario. It is not presented to provide flexibility in design. Environmental measure C7 in the Chapter 6 Biodiversity [APP-035] commits the proposed development to delivery of crossings using bridges.

Relevant Representation Number	Representation	Applicant Response
RR.085	2.1 Internationally designated sites Humber Estuary Ramsar Site and Humber Estuary Special Area of Conservation (SAC) are both designated for River lamprey, Lampetra fluviatilis, and Sea lamprey, Petromyzon marinus (hereby referred to collectively as "lamprey"). As such, the Project has reviewed impacts to lamprey via the functional linkage of the River Trent via the Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA). Natural England are satisfied that the design features and mitigation measures satisfactorily reduce impacts to the lamprey from the Project, including monitoring of the lamprey for five years after construction. Natural England are satisfied that 'green' issues are unlikely to result in adverse effects on the integrity of the following internationally designated sites, subject always to the appropriate mitigation as outlined in the application documents being secured adequately. Further detail on our reasoning for this is given against each impact pathway in Part II.	The Applicant welcomes this response

Relevant Representation Number	Representation	Applicant Response
RR.085	2.2 Nationally designated sites Spalford Warren Site of Special Scientific Interest (SSSI) has been scoped out of further assessment as there are no impact pathways from the Project to the designated features of the SSSI. Natural England agree with this approach. Further detail on our reasoning for this is given against each impact pathway in Part II.	The Applicant welcomes this response.
RR.085	2.3 Protected species Following review of the information provided, Natural England has no significant concerns with respect to the approach to protected species, based on the currently presented information. We have one comment on the Project's approach to bat surveys but acknowledge this is unlikely to make a material difference to our advice or the outcome of the decision-making process. Further detail on our reasoning for this is given in Part II.	The Applicant welcomes this response. With regards winter usage of the survey area by bats. No winter survey of bats was undertaken. Figure 4.1 of the Bat Conservation Trust's guidelines (Collins (ed.) 2023 *Bat Surveys for Professional Ecologists*) was used to scope the need for assessment of winter roosting potential. There were no buildings or trees within or close to the Order Limits close to potential development considered to have more than low potential to support hibernating bats. Therefore, in line with guidance specific surveys were not undertaken.

Relevant Representation Number	Representation	Applicant Response
	Based on submitted documents reviewed, Natural England is not expecting submission of any draft protected species licence applications for review. In the light of further evidence or changes to the DCO, a license may become required. In the event of a license being required, normal licensing process will need to be followed.	
RR.085	2.4 Biodiversity net gain The Environment Act 2021 includes NSIPs in the requirement for BNG which will come into force in 4 November 2025. Until that time, some projects are delivering BNG on a voluntary basis. We are pleased to see the Project includes over 10% BNG commitment with a Habitat Management and Monitoring Plan for the lifetime of the Project within the DCO.	The Applicant welcomes this response.
RR.085	2.5 Nationally designated landscapes	The Applicant notes this comment.

Relevant Representation Number	Representation	Applicant Response
	The site is not located within, or within the setting of, any nationally designated landscapes. As a result, Natural England has no specific comments to make on the landscape implications of this development.	
RR.085	2.6 Ancient woodland and ancient / veteran trees Natural England has no specific comments to make on impacts to ancient woodland and ancient / veteran trees for this Project. We have provided our standing advice in this regard.	The Applicant notes this comment.
RR.085	2.9 Natural England's overall conclusions The main issues raised by this application are impacts to: • lamprey species as designated features of the Humber Estuary SAC and Ramsar site and;	The Applicant notes this comment.

Relevant Representation Number	Representation	Applicant Response
	• the potential impacts to agricultural land and soil function. Impacts to lamprey have been avoided and mitigated through embedded design and environmental management plans.	The Applicant agrees that impacts on sea or river lamprey associated with the Humber Estuary Ramsar site / SAC will be negligible based on best available scientific evidence. The potential effects of EMF on lamprey has been discussed at length during the examinations for West Burton Solar Project, Cottam Solar Project and the Gate Burton Energy Park. The monitoring measures proposed and the conclusions drawn in the Shadow Habitat Regulations Assessment [APP-165] are in line with the position taken by Natural England, the Environment Agency and the Secretary of State for these projects. The Shadow Habitat Regulations Assessment [APP-165] will be updated at Deadline 1 to add some minor clarification.

Relevant Representation Number	Representation	Applicant Response
	Natural England agree with the conclusions drawn through EIA and HRA that impacts will be negligible and not result in adverse effects to integrity of the internationally designated sites. The Project is taking a precautionary approach and have secured monitoring of lamprey, in line with previously approved Projects who have engaged in trenchless crossing of cables below the River Trent. This is in collaboration with the Environment Agency (EA), Natural England and those other Projects to ensure a consistent approach in data gathering and analysis. Impacts to agricultural land and soil function have been adequately reviewed and mitigated. We have requested some further clarity on the longer term storage of soil and the use of concrete shoes, to ensure that the soil can be restored to its original Agricultural Land Classification (ALC) grade and retain its soil function at the decommissioning stage. If these issues are addressed, based on the information provided and reviewed in the ES, then we see no reason this application cannot progress to the Examination stage of the NSIP process	Land that will be returned back to agricultural use following decommissioning will be returned to the prior ALC grade following measures and mitigation outlined in the oSMP [APP-182]. Therefore, as the land is being returned back to the pre-construction condition in line with EN-1 paragraphs 2.10.66 and 2.10.77 the development will be classed as temporary for all areas except green infrastructure. During the operation phase soil quality is able to be improved from nutrient inputs as a result of grazing and reduced agricultural pressure through heavy machinery, ploughing, fertilisers, herbicides and pesticides. During decommissioning the impact on soils has been mitigated through industry standard practice such as using track matting and avoiding wet weather conditions, these measures can be found in detail in the oSMP [APP-182]. Additionally, while a 60-year solar farm may seem like a long-term land use from a human perspective, it represents only a brief moment in the lifespan of soils, which develop and change over geological timescales spanning hundreds of thousands to millions of years. Therefore, its impact on soil processes is relatively short-term in the context of soil evolution. Solar farming being classed as temporary land was agreed by the Examining Authority on the Heckington Fen Solar Farm Decision Letter [EN010123-001129]; "*ExA considers the Proposed Development would result in long term but not irreversible or permanent loss of agricultural land*".

Relevant Representation Number	Representation	Applicant Response
		As set out in the oSMP [APP-182] during construction, operation and decommissioning measures will be put in place to ensure the soil is bring handled correctly and is able to be returned back to agricultural use and the original agricultural grade following the decommissioning phase of the Proposed Development, therefore limited permanent impacts are anticipated.
RR.085	Internationally designated sites • Humber Estuary SAC • Humber Estuary Ramsar	The Applicant notes this comment and notes that environmental measure C12 in Chapter 6 [APP-035] commits to the monitoring requested by Natural England.

Relevant Representation Number	Representation	Applicant Response
	The Humber Estuary SAC and Humber Estuary Ramsar include the designated features River lamprey, Lampetra fluviatilis, and Sea lamprey, Petromyzon marinus (hereby referred to collectively as "lamprey"). The River Trent is functionally linked for adult lamprey travelling upstream to spawning sites on gravel beds and the juveniles (ammocetes) residing in silts before travelling back to the designated sites. The Project has potential to impact on these species due to proximity to the functionally linked waterway and proposed trenchless crossing below the River Trent. The Project has embedded design features to avoid impacts and environmental management plans in place to mitigate remaining potential impacts from construction and decommissioning:	

Relevant Representation Number	Representation	Applicant Response
	- APP-035 6.6 Chapter 6 - Biodiversity, Table 6 C2, trenchless crossing has been chosen as a method of cable installation under the River Trent to avoid direct impacts to the river bed. This is an acceptable approach where design features and mitigation measures are in place to avoid and mitigate associated impacts. The following measures discussed are appropriate to avoid and mitigate impacts from the trenchless cable crossing. • APP-035 6.6 Chapter 6 - Biodiversity, Table 6 C2, includes measures to manage risks of drilling fluid entering the watercourse through the drill profile and distance of the crossing compounds from the bank top. This is intended for any spillages to be negligible. Natural England agree with this approach in combination with the site-specific hydraulic fracture risk assessment and a bentonite fluid breakout plan (see below point).	

Relevant Representation Number	Representation	Applicant Response
	• APP-176 7.4 Outline Construction Environmental Management Plan, Table 3.5, includes further measures to manage drilling fluid breakout including a site-specific hydraulic fracture risk assessment and a bentonite fluid breakout plan, both to be included in the final CEMP. Natural England agree with this approach. • APP-035 6.6 Chapter 6 - Biodiversity, Table 6 C4, notes minimum buffer distances of 16m for works from the river bank and 5m below the riverbed to avoid direct impacts from construction and decommissioning run off and drilling fluid breakout. Natural England agree with this approach. • APP-176 7.4 Outline Construction Environmental Management Plan, Table 3.5, includes measures to manage additional silt reaching the watercourse including directing all run off to sewers, not to a watercourse, and to include the additional feature of settling tanks. Natural England agree with this approach.	

Relevant Representation Number	Representation	Applicant Response
	• APP-176 7.4 Outline Construction Environmental Management Plan, Table 3.5, includes a buffer distance of >20m from the river bank for soil storage and working soils only in dry weather. This should minimise additional fine matter from reaching the watercourse. Natural England agree with this approach. • APP-035 6.6 Chapter 6 - Biodiversity, Table 6 C12, confirms the project will monitor lamprey for five years to ensure impacts from EMF barrier effects are not impacting lamprey during operation. This is to be coordinated with NE, EA and other Projects using trenchless drilling under the River Trent. This is the approach agreed with previous Projects to understand further any barrier impacts from EMF to lamprey in the absence of evidence. Natural England agree with this approach.	

Relevant Representation Number	Representation	Applicant Response
	• APP-165 5.2 Shadow Habitat Regulation Assessment, 3.1.6, screened lamprey in for Appropriate Assessment as Likely Significant Effect could not be ruled out. Natural England agree with this decision. APP-165 5.2 Shadow Habitat Regulation Assessment, 4.1.3 notes the measures included to avoid and mitigate impacts to the designated species with the appropriate commitments. This includes the monitoring of lamprey species to confirm no barrier effects from the cables emitting EMF during operation. • APP-165 5.2 Shadow Habitat Regulation Assessment, 4.1.7 notes the Project will have negligible impacts on lamprey due to the design and mitigation measures outlined with the addition of monitoring. As such this concludes no adverse effect on the integrity of the Humber Estuary SAC and Ramsar site. Natural England agree with this approach, pending the results of the monitoring.	

Relevant Representation Number	Representation	Applicant Response
	The discussed design (avoidance) and mitigation measures are suitable to bring impacts from the Project to the designated lamprey species of the Humber Estuary SAC and Ramsar site to negligible levels. This should include outline environmental management plans becoming full environmental management plans and including the measures specified at the outline stage. They should be secured by requirement of the DCO, as outlined in the APP187 7.15 Commitments Register, paragraph 1.1.2. Monitoring of potential barrier effects from EMF impacting lamprey species, in collaboration with EA, NE and other projects with cables crossing the River Trent with trenchless drilling, for no longer than 5 years, should be secured by requirement of the DCO.	
RR.085	Nationally designated sites • Spalford Warren SSSI	The Applicant notes this comment.

Relevant Representation Number	Representation	Applicant Response
	APP-035 6.6 Chapter 6 – Biodiversity, Table 6.8, notes Spalford Warren SSSI is scoped out of further assessment. Natural England agree with this conclusion as the only potential impact pathway from the Project to this site is from additional air pollution from increased traffic. As outlined in APP-137 6.21 Chapter 13 Appendices 13.1 - 13.5, Table A13.4.2, Average Annual Daily Trips (AADT) of HGVs will be below 200 and so there is no likely significant effect on the designated features at the site from additional air pollution generated by traffic from the Project	
RR.085	Protected species APP-035 6.6 Chapter 6 – Biodiversity, Table 6.6 C11. Further assessment of the of the winter bat activity would be useful to understand further how bats are utilising the habitat year-round or justification for not undertaking hibernation surveys to be provided.	Winter bat activity surveys were not undertaken as no buildings or trees considered to have the potential to act as winter roosts were identified within the Order Limits. [APP-035]. For that reason, the Applicant does not consider winter bat activity surveys are required.

Relevant Representation Number	Representation	Applicant Response
	Winter bat activity surveys or justification for not including must be provided to NE.	
RR.085	Biodiversity net gain APP-093 6.21 Appendix 6.10 Biodiversity Net Gain Assessment. Natural England welcome the commitment to providing BNG well over the suggested 10% provision (paragraph 4.2) and securing this for the lifetime of the project through the DCO (paragraph 3.1.4) despite the provision for BNG in NSIPs not yet being mandatory (paragraph 1.1.4). We welcome the approach taken to engage local stakeholders in the development of the BNG strategy to ensure it works for the local environment (APP-035 6.6 Chapter 6 – Biodiversity, Table 6.5). We suggest securing a BNG commitment of at least 10% and ongoing Habitat Management and Monitoring Plan for the lifetime of the project via a requirement of the DCO	The Applicant notes this comment.
RR.085	National designated landscapes	The Applicant notes this comment.

Relevant Representation Number	Representation	Applicant Response
	The site is not located within, or within the setting of, any nationally designated landscapes. As a result, Natural England has no specific comments to make on the landscape implications of this development. The examining authority should have regard for the landscape character of the area and we welcome the reference to Natural England's National Character Areas in the ES. No further comment	
RR.085	Ancient woodland and ancient/veteran trees Natural England have no specific comments on ancient woodland or ancient / veteran trees. We would direct the Project to our standing advice where any impacts are identified: Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK No further comment	The Applicant notes this comment.

Relevant Representation Number	Representation	Applicant Response
RR.131	Thank you for consulting the Forestry Commission on the proposal. As the Governments forestry experts, we endeavour to provide as much relevant information to enable the project to reduce any impact on irreplaceable habitat such as Ancient semi natural Woodland as well as other woodland. There are no ancient woodlands within the proposed site area, although there are a few areas of mixed deciduous woodland adjacent to the site and two small areas of grant funded woodland surrounded by the proposed site.	The Applicant notes this information.

RR.131	Priority Habitat: Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England). They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England". Fragmentation is one of the greatest threats to lowland mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic and dust, particularly during the construction phase of a development.	The Applicant notes this information.
RR.131	Ancient & Veteran Trees:	The Applicant will add an environmental measure in Chapter 6 Biodiversity [APP-035] to directly reference veteran trees at Deadline

	We note there are a number of veteran trees within the proposed site. Ancient and veteran trees are irreplaceable habitats. Paragraph 5.4.32 of the Overarching National Policy Statement for Energy (EN-1) states: "Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases" We would particularly refer you to further technical information set out in Natural England and Forestry Commission's "Standing Advice on Ancient Woodland, Ancient and veteran trees and "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England. The Joint NE/FC Standing Advice also states that both the direct and indirect effects of development should be considered for both the construction and operational phases of the proposed development. For ancient or veteran trees the buffer zone should be at least 15 times larger than the diameter of the	1. Veteran trees will also be referenced in the baseline of Chapter 6 [APP-035] and considered within the scope of the assessment.

Relevant Representation Number	Representation	Applicant Response
	tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals).	

RR.131	Woodland Creation and Tree Planting: The proposed site includes approximately 1,409ha of land. It is unclear from the documents how much native woodland and tree belts are planned under landscape enhancements, there are 2 figures available of 4.2ha and 5.5ha stated in two separate documents. We note there are planned offsets for existing woodlands of 25m and that dust and pollution control measures will be employed. With the Government target to increase tree and canopy cover to 16.5% of land area in England by 2050, The Forestry Commission is seeking to ensure that tree planting is a consideration in every development. Paragraph 4.3.20 of the Overarching National Policy Statement for Energy (EN-1) states: "The Government has set 13 legally binding targets for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas.	The Applicant has sought to ensure that all woodland, tree, scrub and hedgerow planting increases the level of connectivity. The landscape design has not sought to increase woodland cover markedly as there are other constraints that require delivery of more open mitigation land (e.g. skylark). However, large hedgerows, hedgerow trees, scrub, scattered tree planting and woodland will all increase the presence of trees in the landscape. It is noted that the difference between the 4.2ha of woodland and 5.5ha of woodland is driven by different definitions of woodland type. The 4.2 ha is driven by the categories associated with the Biodiversity Net Gain assessment [APP-093].

Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act."

It is important that woodland creation is not just used as screening at strategic locations and ensures habitat connectivity throughout the landscape.

For example with the creation of some larger woodland blocks on site, to link existing woodlands to improve ecological connectivity, making woodlands more resilient and to benefit biodiversity across the whole area.

Ideally, we would like to see woodland creation carried out in 5ha blocks or that connecting planting with existing woodlands, should create blocks of at least 5ha as part of a mosaic of habitat types.

Without appropriate mitigation, woodlands that

become isolated in the landscape can lead to an increase in fragmentation without functional habitat connectivity.

For example, the eastern area of the site includes an area that is between Road Wood and West Wood, mixed deciduous woodlands. Both of these woods are in close proximity to two small areas of woodland that were created or managed with the support of public money in the form of the Farm Woodland Premium Scheme.

The area between the mixed deciduous woodlands is planned for solar arrays, with one small area of species rich grassland which would connect Road Wood with one of the grant funded woodland areas.

A section of woodland planting between Road Wood and West Wood, extending to the second smaller isolated woodland would improve habitat connectivity, biodiversity and climate resilience across all of the woodlands.

The biosecurity of all planting stock also needs to be considered. Woodlands need to be climate, pest and disease resilient. Plans should also be in place

Relevant Representation Number	Representation	Applicant Response
	to ensure the long term management and maintenance of any new and existing woodland, with access also needing to be considered for future management.	
Consultation		
RR.093	We have received notification of the above by One Earth Solar Farm Ltd on the 7th April 2025. I have checked the site location plan against the information held by the Coal Authority and can confirm that the proposed development site is located outside of the defined coalfield. On this basis, the Planning team at the Coal Authority have no comments to make. Please do not hesitate to contact me if you would like to discuss this matter further. Yours faithfully The Coal Authority Planning Team	Noted.

RR.037	I can confirm that, following review of the application documents, the proposed development falls outside of MOD safeguarded areas and does not affect other Defence interests. The MOD, therefore, has no objection to the development proposed. The MOD must emphasise that this email is provided specifically in response to the application documents and supporting information provided on the Planning Inspectorate website for this specific application. Amendments to any element of the proposed development (including the location, dimensions, form, and/or finishing materials of any structure) may significantly alter how the development relates to MOD safeguarding requirements and may result in detrimental impact(s) on the operation or capability of Defence sites or assets. In the event that any: • revised plans; • amended plans; • additional information; or • further application(s) are submitted for approval, the MOD, as a statutory consultee, should be consulted and provided with adequate time to carry out assessments and provide a formal response	Noted.

Relevant Representation Number	Representation	Applicant Response
	whether the proposed amendments are considered material or not by the determining authority.	
DCO		

RR.102	Project Reference: EN010159. Relevant Representation submitted by Osborne Clarke LLP on behalf of National Grid Electricity Distribution (East Midlands) plc ("NGED"). Osborne Clarke LLP act for NGED whose registered office is at Avonbank, Feeder Road, Bristol, BS2 0TB. NGED is the licensed distribution network operator under Section 6 Electricity Act 1989 (the "EA 1989") for the area in which the One Earth Solar Farm Project Development Consent Order 202* (the "Order") is proposed to have effect. Section 9 of the EA 1989 places a duty on NGED as the electricity distributor to develop and maintain an efficient, co-ordinated and economical system of electricity distribution. The application was received by the Planning Inspectorate on 27 February 2025 and accepted on 27 March 2025. The application includes land in or upon which NGED may have assets and which may include (but are not limited to) high voltage electricity cables. NGED is currently reviewing the draft Order setting out the Authorised Development to establish the extent to which their apparatus and interests are	The comment is noted, and the Applicant is in discussions with NGED in relation to protective provisions to ensure the appropriate protection is in place for its undertaking.

affected.

While NGED will continue to seek to have positive engagement with the applicant in relation to the project, NGED needs to ensure that the wider powers being sought in the Order will not have a detrimental impact on NGED's electricity network and its duties under the EA 1989. This includes ensuring acceptable terms of any proposed protective provisions.

NGED is therefore making this representation as a holding objection to the application until an asset protection arrangement has been agreed between the parties. No formal agreement has yet been concluded and accordingly we are lodging this representation to protect NGED's position pending conclusion of an appropriate agreement.

Once NGED is satisfied that its network is protected, we will notify the Planning Inspectorate promptly and withdraw the objection.

17 April 2025 Osborne Clarke LLP Our reference: MIA/1257090/AHPK

Relevant Representation Number	Representation	Applicant Response
RR.060	JG Pears Group note the information provided in the application documents relating to OESF DCO grid connection and understands that the OESF DCO intends to connect into a National Grid's proposed substation at High Marnham, with a grid connection agreement in place with National Grid in this regard. However, JG Pears Group is aware that National Grid's substation development scheme has not yet been formally submitted or authorised, leaving a significant amount of uncertainty around the actual delivery of the OESF DCO (and any benefits it may have), should it be consented	The Applicant considers that the Secretary of State can be satisfied there is no obvious reason why the High Marnham substation works would not come forward, and there is no justification for any requirement being imposed on the Proposed Development in this respect. Paragraph 4.11.8 of NPS EN-1 anticipates and allows for the circumstance in which "it may not be possible to coordinate applications" and paragraphs 4.11.8 and 4.11.9 go on to set out what the Applicant needs to satisfy the decision maker of in that situation. The Applicant has addressed the requirements of these paragraphs, including that there is no obvious reason why the application for the High Marnham substation should be refused. National Grid has indicated it is pursuing an application for planning permission for the High Marnham substation, and the Applicant understands this will be submitted in Q4 of 2025, and the Applicant anticipates planning permission being granted, having regard to relevant planning policy. Paragraph 4.11.8 of EN-1 requires an applicant to include information on other elements, and the Applicant has complied with this by providing information about the High Marnham substation including as set out in its cumulative assessment at, Chapter 18: Cumulative Effects [APP-047].

Relevant Representation Number	Representation	Applicant Response
		The Applicant has a grid connection agreement with National Grid, and as the system operator, National Grid is under certain obligations to deliver on the grid connection under the agreement in place. In this respect, the Applicant has provided a Grid Connection Statement [APP-174] which aims to give confidence in how the grid connection will be provided. This sets out that there has been a grid connection offer and agreement with National Grid to deliver the connection in 2029 and it is under general obligations to do so. Based on NGET's Transmission Owner's Licence: Standard Licence Condition D4A: Obligations in Relation to Planning, NGET is required to undertake all reasonable steps to obtain the required consents. Finally, the commercial reality is such that it is not realistic or even likely that there would be a situation in which the Applicant built out the entire solar farm without any grid connection; the situation raised by the Council is therefore not a realistic one.

RR.097	Framework management plan documents: Document 7.4 Outline Construction Environmental Management Plan (see Table 3.12 Table 3.12: Telecommunications, Television Receptors and Utilities) Document 7.5 Outline Operational Environmental Management Plan (see Table 3.15: Utilities) Document 7.6 Outline Decommissioning Environmental Management Plan (see Table 3.13. Telecommunications, Television Rection and Utilities) Document 7.9 Outline Construction Traffic Management Plan – copy not uploaded this is a copy of the Outline Skills, Supply Chain and Employment Plan. We welcome the submission of these framework documents, however they refer to compliance with Protective Provisions in Draft DCO [EN010159/APP/3.1]. Instead Bespoke Protective Provisions provided by AWS should address those interactions with our assets. These documents should include steps to remove the risk of damage to AWS assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings. AWS would seek to ensure that 24 hours /7-day access to our assets is not compromised, and therefore would welcome further discussion with the Applicant regarding such matters and their inclusion in the final versions of these documents.	The Applicant is in discussions with Anglian Water with respect to bespoke protective provisions.

Relevant Representation Number	Representation	Applicant Response
RR.063	Summary of Relevant Legislation '6.2.1 Volume 3 Appendix 8.1 Summary of Relevant Legislation, Policy and Technical Guidance. A.8 Land, Soil and Groundwater Legislation, Planning Policy and Guidance' does not cite several key legislation and technical guidance documents. Notably the only cited guidance relates to agricultural land classification; no land contamination related guidance is identified. Absent from the appendix are the following: • Environment Act, 1995, 2021 • Water Environment (WFD) (England and Wales) Regulations, 2017 • Groundwater (England and Wales) Regulations, 2009 • Water Act, 2003 • Hazardous Waste (England and Wales) Regulations, 2005	6.2.1 Volume 3 Appendix 8.1 Summary of Relevant Legislation, Policy and Technical Guidance has been updated to take account of the relevant legislation.

Relevant Representation Number	Representation	Applicant Response
	• Environmental Damage (Prevention and Remediation) Regulations, 2009 • Anti-Pollution Works Regulations, 1999 • Control of Pollution (Oil Storage) (England) Regulations, 2001 • Construction Industry Research and Information Association (CIRIA) report Contaminated Land Risk Assessment (A guide to good practice) C552, 2001 • CIRIA C532 Control of Water Pollution from Construction Sites – Guidance for Consultants and Contractors, 2001 • Environment Agency Land Contamination Risk Management, 2023 • Environment Agency's Approach to Groundwater Protection, 2018	

Relevant Representation Number	Representation	Applicant Response
	• Environment Agency Pollution Prevention Guidelines (in particular PPG1, PPG5, PPG6, PPG21)	
RR.085	Pages: Pages 50, 51, 53 Requirements 8, 13, 20 Natural England welcome the inclusion of requirements to avoid and mitigate impacts to lamprey functionally linked to the Humber Estuary SAC and Ramsar site from the Project. And note these will be secured through the CEMP, DEMP and LEMP. We note the details laid out in Paragraph 1.1.2 and Table 1.1 of the Commitments Register C2, C4, C12, C14.	Noted.
RR.085	Page 50 Requirement 8	Noted.

Relevant Representation Number	Representation	Applicant Response
	Natural England welcome monitoring of barrier effects from EMF to lamprey species functionally linked to the Humber Estuary SAC and Ramsar site. We note this will be secured through the LEMP. We note the details laid out in Paragraph 1.1.2 and Table 1.1 of the Commitments Register C12.	
RR.085	Page 53 Requirement 19 We welcome the inclusion of a SMP to ensure agricultural grade and function are restored at decommissioning. We note the details laid out in paragraph 1.1.2 and Table 1.1 of the Commitments Register C46, C47, C48.	Noted.
RR.085	Page 50 Requirement 9	Noted.

Relevant Representation Number	Representation	Applicant Response
	We welcome the inclusion of a requirement for BNG and with reference to the planning authority and nature conservation body, for the lifetime of the Project. We would suggest a commitment in the DCO for at least 10% gains and a Habitat Management and Monitoring Plan to ensure the habitats are retained.	
RR.085	Page 53 Requirement 20 We welcome the time limited requirement as part of the decommissioning plan to 60 years	Noted.
RR.085	Page 52 Requirement 18	Noted.

Relevant Representation Number	Representation	Applicant Response
	We welcome the inclusion of new permissive paths network as secured through the LEMP to increase green infrastructure provision and PRoW MP to maintain access to PRoW during construction. We note the details laid out in Paragraph 1.1.2 and Table 1.1 of the Commitments Register C61 and C74.	
Health		

RR.004	Will the proposed development fall within any of HSE's consultation distances? According to HSE's records, the proposed DCO application boundary for this Nationally Significant Infrastructure Project is within the consultation zones of one major accident hazard site ['MAHS'] and no major accident hazard pipelines ['MAHP']. This is based on the redline shown in the drawing APP-012 '2.1 Location plan' EN010159/APP/2.1 Rev 01 2025-01-06 [downloaded from: CTB London drawing template]. HSE's records indicate that major accident hazard site is: • JG Pears (Property) Ltd & Geopura Ltd, Fledborough Road, High Marnham, Newark NG23 6SH, HSE Ref H4958. HSE's Land Use Planning advice is dependent on the location of areas where people may be present [HSE: Land use planning - HSE's land use planning methodology]. Based on the information in the Application Documents it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development	The Applicant is not aware of any need for a Hazardous Substance Consent for the Development, based on substances expected to be on site. If this changes, the application process will be undertaken accordingly.

Consent Order application is submitted.

Would Hazardous Substance Consent be needed? Hazard classification is relevant to the potential for accidents. Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an "addition rule" in Part 4 of Schedule 1 for below-threshold substances. Based on the Application Documents, it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no in-scope hazardous substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application.

Consideration of Risk Assessments Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where

relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11 "working with public bodies in the infrastructure planning process" Annex G on the Planning Inspectorate's website: Nationally Significant Infrastructure Projects - Advice Note Eleven, Annex G: The Health and Safety Executive - GOV.UK (www.gov.uk). This document includes consideration of risk assessments under the heading "Risk assessments". In the Application Documents it was not clear if there was consideration of risk assessments arising from the development's vulnerability to major accidents from the above identified sites and/or pipelines. We would advise this is considered further in line with Advice Note 11 Annex G taking account of the following: "it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses.". Note there are no requirements for any risk assessments submitted to and approved by the relevant planning authority to also be considered by HSE.

Relevant Representation Number	Representation	Applicant Response
	Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.	
Heritage		
RR.056	SETTING OF DESIGNATED HERITAGE ASSETS We have reviewed setting impacts in respect of highly graded designated heritage assets. We have sought clarification on the applicant's assessment of the change in setting of the church tower at Dunham-on-Trent, as well as other designated churches within visual amenity of the proposal. We consider that further consideration as to potential setting impact should be given.	These comments were provided during pre-application discussions, prior to submission. As such, they have been recognised and addressed within Table 10.5 of Chapter 10: Cultural Heritage [APP-039]. To clarify:

Relevant Representation Number	Representation	Applicant Response
	We suggest that a better understanding of the proposals to the fields to the north of North and South Clifton as viewed from Fledborough viaduct would be helpful. We remain uncertain regarding the scope of proposals in these areas and therefore the appropriateness of mitigation measures. We highlight the need for provision of landscaping and mitigation around the substation proposed near Gibraltar Farm; the impact of lighting and various other security and safety interventions required need to be considered in the Environmental Statement. The exact position of the substation on the site near Gibraltar Farm will determine an extent of the harm and clarification of this would help with the applicant's assessment.	The assessment of the Church of St Oswald, Dunham on Trent has been provided at paragraphs 10.6.48 - 50 of ES Chapter 10: Cultural Heritage [APP-039), supported by baseline analysis in Appendix 10.2 [APP-128]. This assessment reviewed the visibility (Figure 10.3 [APP-055)) and referred to views looking south of Dunham (see Figure 11.13.16A; 11.13.16B [S-040]) to support the understanding of potential effects. Due to the distance away (c.800m) and lack of visibility of the Proposed Development in key views of the Church from within the parish, or from the churchyard itself, there would be no effect on the value (significance) of the Church. The understanding of Proposed Development in relation to North and South Clifton is supported by LVIA photomontages (Views 25a, Figure 11.13.7a, S-038) and Zone of Theoretical Visibility (Figure 10.3 [APP-055] (APP-039]). The effect on heritage assets within North and South Clifton is provided in pages 51-53 and page 57 of ES Chapter 10 [APP-039]. There are no harmful effects identified to these assets.

Relevant Representation Number	Representation	Applicant Response
	Furthermore, we suggest that the viewpoint from the Roman Fort Scheduled Monument should be from the observer corps. post (which is part of the scheduling). This is a designed viewpoint, which utilises the same topography as the fort, thus contributing to its significance.	The mitigation for Gibraltar Farm has been clarified at 10.5.5 of Chapter 10 [APP-039], and the assessment has been provided at 10.6.65 - 67. Whilst there would be some harm, this needs to be considered proportionately to the very low value (significance) of this asset. As noted in Table 10.5, the additional view requested from the Roman Fort Scheduled Monument has been provided at Figure 10.7 [APP-055]. To confirm, as per the assessment at 10.6.15 and 10.6.81 - 85, this view is not considered to be a designed viewpoint as it was built after the Royal Observer Corps remit had changed to monitoring nuclear explosions and fall out, all tasks undertaken from within the bunker itself, rather than from the surface. As discussed in detail in the assessment, there are not considered to be harmful effects to the significance of this asset during operation.

Relevant Representation Number	Representation	Applicant Response
RR.056	BURIED ARCHAEOLOGICAL REMAINS With regard to the wider archaeological landscape, we note that the Environmental Statement conclusions include that there will be significant operational effects to the Scheduled Monument at Whimpton Moor. Whilst the draft masterplan proposes that the Scheduled Monument will have its existing boundary hedgerow to the south strengthened with native species, we remain concerned regarding the proximity of the solar panels to the south of the Scheduled Monument and suggest that a larger buffer would be more appropriate mitigation in this location, possibly by removing the triangular area of panels to the brown line indicated on the masterplan. We also remain concerned regarding the proximity of the panels to the west and south of the reservoir, due to the potential for archaeological deposits in this area associated with the Roman Fort Scheduled Monument.	The effect on the setting of Whimpton Moor Scheduled Monument has been assessed in Chapter 10 at 10.6.39 – 41 [APP-039]. Views are a relevant consideration (as per Historic England guidance on setting, 'GPA3'). The asset is below-ground and not appreciable in eye-level views currently; notwithstanding this, the Proposed Development has been designed in response to the topography and would not be visible in views of the Scheduled Monument (see Figure 11.13.13A; 11.13.13B [AS-039]). It is also noted that the surrounding landscape is unlikely to reflect the historic character of the landscape when the village was active (due to the effects of Enclosure, likely over 200 years after the village was deserted), thus makes a lesser contribution to the value of the asset. As such, any setbacks to the south would not alter the visual appreciation of setting (due to design mitigation) or relate to known historic landscape character at the time the village was active. As detailed in Chapter 10 [APP-039], whilst there would be a significant adverse effect arising, this would equate to less than substantial harm and would been to be weighed against the public benefits of the Proposed Development (as per NPS EN-1 paragraphs 5.9.32 - 5.9.33). And NPS EN-3 notes that in considering the effects on the Historic Environment, the positive role and substantial public benefits associated with large-scale renewables projects should be taken into account (paragraph 2.3.8)

Relevant Representation Number	Representation	Applicant Response
		If the developable area of the Proposed Development was setback to the brown access road, this would result in an offset to the Scheduled Ancient Monument of approximately 113 metres at the shortest end (west) and 170 metres at the longest end (east). The present offset from the Scheduled Monument is 50 metres and the recommended arbitrary offset would represent over double the current mitigation strategy. The DBA and geophysical survey detected potential buried heritage assets south of the water reservoir. The areas have been evaluated via trial trenching in March 2025, and the results of the evaluation will be submitted alongside the draft Outline Written Scheme of Investigation, along with the proposed Mitigation Strategy.

Relevant Representation Number	Representation	Applicant Response
RR.056	DEPOSIT MODELLING AND GEOLOGY Regarding deposit modelling and geoarchaeology, we take the opportunity to highlight the potential for prehistoric archaeology and geoarchaeological remains and deposits associated with the watercourses present through the proposal. These should be suitably characterised, assessed and mitigated through an appropriate scheme of archaeological works.	A geoarchaeological deposit model has been carried out as part of the Archaeological Desk Based Assessment and informed the results of Chapter 9: Buried Heritage [APP-038] as part of the programme of evaluations carried out to inform the DCO. An appropriate mitigation strategy, as discussed in Chapter 9: Buried Heritage [APP-038] will be finalised once the full impact, if any, in the relevant areas of the Proposed Development will be understood. The geoarchaeological deposit model has been carried out in line with Historic England Guidance for geoarchaeology.
	Draft DCO As submitted, the draft DCO requirement 12 reads as follows:- Archaeology 12.—(1) No part of the authorised development may commence until for that part: (a) an archaeological mitigation strategy has been submitted to and approved by the relevant planning authority in consultation with Historic England;	Alongside Historic England, the Archaeology Advisory Teams to the LPAs will be consulted thorough the process to define an appropriate Mitigation Strategy. A strategy for an appropriate additional phase of trial trenching will be included in oWSI, which will also include the draft Mitigation Strategy, which will be updated as the Project Design develops and informed by any future phase of trial trenching.

Relevant Representation Number	Representation	Applicant Response
	(b) any additional trial trenching required pursuant to the approved archaeological mitigation strategy to inform the approach to mitigation has been carried out in accordance with the approved strategy; and (c) where additional trial trenching to inform the approach to mitigation has been undertaken under sub-paragraph (b) updates are made to the archaeological mitigation strategy approved under sub-paragraph (b) to account for the results of the additional trial trenching carried out and such updated archaeological mitigation strategy has been submitted to and approved by the relevant planning authority in consultation with Historic England. (2) The archaeological mitigation strategy under sub-paragraph (1)(a) must be substantially in accordance with the relevant requirements in the outline construction environmental management plan.	Providing a flexible strategy for the next phases of trial trenching evaluation and mitigation allows the DCO to remain flexible and responsive to any future potential environmental constraints, technological advancements, and updates in professional guidance. The need for flexibility in design, layout and technology is recognised in National Policy Statement EN-1 is details of a development, such as the final design, may not be finalised until after consent is granted. This approach aligns with industry best practice and has been successfully adopted on recently consented NSIPs (such as Longfield Solar Farm, Essex; Mallard Pass Solar Farm, Lincolnshire; and Springwell Solar Farm, Lincolnshire).

Relevant Representation Number	Representation	Applicant Response
	(3) For the purposes of sub-paragraph (1), "commence" includes any permitted preliminary works except that part (a) of the permitted preliminary works is only included with respect to intrusive archaeological surveys. (4) Any approved archaeological mitigation strategy (whether pursuant to sub-paragraph (1)(a) or (1)(c)) must be implemented as approved and maintained throughout the construction of the authorised development and any archaeological works or watching brief must be carried out in accordance with the approved strategy.	

Relevant Representation Number	Representation	Applicant Response
	We welcome the commitment to ongoing engagement with Historic England on the development of an Archaeological Mitigation Strategy. However, we take the opportunity to assert that for this approach to be successful, the applicant must maintain flexibility in their design approach to facilitate the appropriate mitigation through design in response to potential archaeological remains forthcoming. As in cases where additional assessment stage trial trenching was to be undertaken post-DCO, there needs to be a mechanism whereby the results of that work have a material bearing upon the subsequent phase of archaeological mitigation scheme.	

We suggest that 12 (1) (a) requirement should identify Lincolnshire County Council and Nottinghamshire County Council as consultees alongside Historic England as the relevant archaeological curators, who are located in the upper tier Local Authorities. This commentary is also relevant to 12 (1) (C). A review of 12 (1) (C) is required, as contains a possible typographical error. We ask, whether the second reference to sub paragraph (b) within, should read sub paragraph (a); currently we are unclear as to the mechanism of approval within rounds of revision to the proposed Archaeological Mitigation Strategy. We note that within the draft DCO there is no commitment to the development and implementation of Written Schemes of investigation for the proposed phases of Trial Trench Evaluation. We suggest that the there is a need to submit an initial Archaeological Mitigation Strategy to take account for the need for additional Trial Trench Evaluation as well as general approach to archaeological mitigation, and this should be submitted during the hearing process, and pursuant to 12 (1) (a). We suggest 12 (1) (b) should be relevant to the development, review and approval of a Written Scheme of Investigation, and 12 (1) (c) as well as (2) should create a relationship between not only the CEMP,

Relevant Representation Number	Representation	Applicant Response
	but the AMS and subsequent Written Schemes of Investigation.	
Hydrology & Hydrogeology		
RR.097	Flooding and surface water drainage Table 4-1 'Surface Water Drainage Hierarchy in the Flood Risk Assessment (FRA) and Outline Drainage Strategy' (Document APP-095 - Environment Statement 6.21 Appendix 7.2) confirms it does not require the use of the public sewer network to manage additional surface water flows. As a result, we would want to ensure that there should be no right to connect powers included within the draft DCO on a temporary or permanent basis. AWS reserves its position on the need to be a consultee pre commencement Requirement on the final drainage strategy for the scheme to be submitted to the Councils, until the FRA is produced alongside the detailed design.	There are no current proposals to connect surface water flows to any Anglian Water public sewer and there is therefore no right to connect powers proposed for surface water.

RR.097	Water supply AWS has previously submitted representations regarding the proposed development being within an area of serious water stress designated by the Environment Agency. Some detail on the need for water usage and reducing onsite water demand for the project is set out under 'Chapter 7: Hydrology and Hydrogeology' of the Environmental Statement at during the construction, operational and de-commissioning phases. Table 7.4 Summary of Significant Environmental Effects indicates that water supply requirements for the project are to be agreed with AWS. Information has been provided to the Applicant about regarding requests for water supply for domestic and non-domestic purposes. In summary, AWS has a statutory duty to supply water for domestic purposes. This means we are legally obliged to supply water to all household properties as well as any domestic requirements (e.g., drinking water, hand-basins, toilets and showers) of non-household properties. In many cases, domestic demand will be the only requirement for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers). Non-domestic demand refers to water use for industrial processes, (e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type	If at detailed design, it is confirmed that potable water demand is in excess of 20m^3/day then a Water Resource Assessment will be produced prior to detailed design and suggest this is secured through requirement. Wastewater will likely be tankered to a Severn Trent water treatment plant rather than AWS. However, this is subject to detailed discussions with Severn Trent and tankered waste contractors and it is preferable therefore for the draft DCO Order to include a provision for a general right to connect to AWS foul wastewater assets.

of water usage where it might put at risk our ability to supply water for domestic purposes. Although AWS does not have a statutory obligation to supply for non-domestic purposes in these circumstances, we factor this into our Water Resources Management Plan and we do everything we can to support businesses in the region, with the help of the water retail market. However, the situation is now changing, due to water supply being squeezed by abstraction reduction, climate change and a fast-growing population. Therefore, where new and unplanned non-domestic requests are received, which exceed 20,000 litres per day (0.020 Ml/d) (this may be less dependent on the availability of water in that area) or where there is a cumulative impact from a significant number of smaller requests, there might be the need to decline to protect existing supplies and the environment. AWS has adopted a 'Non-Domestic Water Requests Policy (December 2024) which states that requests over 20m3/day will be declined. However, for Nationally Significant Infrastructure Projects that are requesting over 20m3/day of non-domestic water (as defined above) for a scheme, a Water Resource Assessment must be completed. This is so we can better understand water demands, water efficiency measures and more effectively forecast water

Relevant Representation Number	Representation	Applicant Response
	supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth.	

	Water recycling The Scoping Opinion issued by PINS stated the ES should confirm the method of disposal for foul water and demonstrating this would not result in a likely significant effect, particularly with regard to existing capacity of wastewater treatment facilities either from existing infrastructure or if unconnected from the mains. The ES should also demonstrate agreement with the relevant consultation bodies. It is noted that Table 3.2.1 of document '6.21 Appendix 2.2 ES Response to PINs Scoping Opinion' (APP-081) states that any foul runoff from the construction site, operational site and during decommissioning would be directed to cesspits with no positive connection to any public foul sewers. The cesspits would be emptied periodically (timeframes to be confirmed) and tankered to the nearest wastewater treatment works. Whilst it is not expected to make any connections into existing AWS infrastructure, it is not clear if the foul water would be directed to an AWS facility and any agreement sought on this. There would then be no need for the draft DCO Order to include any provisions providing for a general right to connect to any of AWS wastewater assets.

Relevant Representation Number	Representation	Applicant Response
RR.060	It is clear from the OESF DCO application documents that a significant part of OESF will be located on land within flood zone 2 and flood zone 3, which is at medium to high risk of flooding. JG Pears Group note that there has been flooding in this area, which has occurred more regularly in recent years. NPS EN3 provides that flood risk needs to be mitigated against and whilst the minimum height of the proposed solar panels is 1.8m (to provide a freeboard of 300m), this is not sufficient to ensure blockages of flood flows can be avoided across the development. There are areas of the proposed site where flood levels are above 1.5m and therefore a freeboard of 300mm would not be provided for and blockages of flood flows could occur. Giving the level of flood risk, which is only increasing, JG Pears Group consider that the OESF DCO, in its current proposed form, will not be resilient to flooding in parts and therefore does not meet the requirements of NPS EN1 and EN3.	Only a small portion of the solar panels would experience flooding at their base, and the depth of flooding to the panels will be limited. This was discussed and agreed in meetings with the EA and included within meeting minutes. The raising of the panels will be achieved through the use of slender frames meaning that the potential for debris blockages is kept to a minimum, and even if there were to be some minor obstruction, flood water would continue to flow. Furthermore, the panels frames will be designed to withstand debris impact as required. Within the Site's operation and management strategies, details for maintenance actions to be taken at regular intervals and following a flood event will be outlined. This will be confirmed at detailed design however, it is anticipated that this will include the following: • Clearance of any debris collected on fences, paths, roads and between panel supports.

Relevant Representation Number	Representation	Applicant Response
		• Inspection of panel supports and fences to ensure structural integrity. Should any issues be observed, then remediation measures will be implemented. Refer to Section 3.1.5 of the FRA [APP-095] for clarity.
RR.063	Topic Watercourse Sensitivity Document Reference Environmental Statement, Volume 2: Aspect Chapters Chapter 7: Hydrology and Hydrogeology - Section 7.6.15	The conclusion that the ordinary watercourses have a low receptor sensitivity was based on our sensitivity classifications set out below: • High - High importance and rarity, national scale, and limited potential for substitution. • Medium - Medium or high importance and rarity, regional scale, limited potential for substitution. • Low - Low or medium importance and rarity, local scale. • Negligible - Very low importance and rarity, local scale.

Relevant Representation Number	Representation	Applicant Response
	Issue Reference EAFBG-012 Issue "Given the scale and location of the ordinary watercourses (i.e. smaller and generally downstream within their catchments) and the scale of the River Trent (i.e. larger and therefore subject to significant dilution), the sensitivity of watercourses as a receptor are considered to be low." The wording of this statement is confusing as it appears imply that smaller watercourses with lower flows are less sensitive to impacts, when the opposite is often true. Impact The current wording of this statement is confusing and may also be factually incorrect. Sensitivity of watercourses is dependent on many things, not just position within the landscape.	Given that the ordinary watercourses are generally downstream within their catchments, they are considered to have a local scale. Furthermore, the ordinary watercourses are all tributaries of the much larger River Trent where any potential pollutants would be subjected to significant dilution. However, even if the watercourse sensitivity were to be considered high, the magnitude of impact would still be negligible and the significance of effect would still be considered to be "not significant". With this in mind, the conclusion of overall significance for existing watercourses during construction would remain.

Relevant Representation Number	Representation	Applicant Response
	Solution Edit/reword statement to make it clearer as to what is meant. Also, ensure that sensitivity of watercourses is determined on a case-by-case basis, rather than a blanket approach. Additional Comments It is assumed that the conclusions reached by this statement are that the smaller watercourses are less sensitive to impacts due to already being in "poor" condition that any impacts would be negligible. WFD and BNG aims to improve the status of watercourses, whatever the size.	

RR.063	Culverts We recognise the need to cross watercourses has been kept to a minimum and that permanently wet watercourses will be crossed using open span bridging techniques. However, using the term "culverting" (Volume 2: 7.4 Outline Construction Environmental Management Plan: "Temporary impacts on sediment dynamics and hydro-morphology within watercourses and waterbodies, where new crossings are required to lay cables, or where culverting is required for new access tracks") implies that culverts can/will be used. The EA has a general policy against the use of culverts as they may harm the WFD status of a waterbody by interfering with mammal passage, free flow of water, sediment movement and cause excessive shading. In addition, box culverts can cause an issue with confined space working, especially during inspections. The use of a culvert needs to be justified as being the only option for a particular crossing, with no other alternatives. Where this is the case, ensure that culverts are 3-sided/arched rather than box/piped culverts, thereby avoiding interaction with the channel bed and associated bedforms. Box/piped culverts with a minimum invert burial depth of 300mm below the hard river bed should remain the last resort.	The location of watercourse crossings is yet to confirmed given the outline nature of the application. Culverting will be a last resort (with clear span structures being preferred) but may be required in some areas due to locations specific constraints. However, the need for culverted crossings will be assessed on a case by case basis and the requirements of the EA, LLFA and IDB with regards to culverting will be agreed through consultation at detailed design.

Relevant Representation Number	Representation	Applicant Response
RR.063	Topic: Submerged panels Document Reference Appendix 7.2: Flood Risk Assessment (FRA) and Outline Drainage Strategy February 2025 Issue Reference EAFR-001 Issue: Across the site there are panels which may be submerged by up to 600mm in a design flood event. These panels would not remain operational and may have implications on flood risk. Impact: The site may not remain operational in times of a flood.	The approach and areas where panels would be subject to flooding was discussed in meetings with the EA and agreed to. Please refer to the following: • Second Flood Risk Meeting – Section 3 Paragraphs 7 & 8 summarising flooding depths and impact. Paragraph 9 summarising agreement from the EA. • Third Flood Risk Meeting – Item 3.6 and 3.8 summarising where panels would experience flooding. Item 3.8 with the response from EA where no concerns were raised to this. Refer to Appendix A3 of the FRA (APP-095) for details of the meeting minutes.

Relevant Representation Number	Representation	Applicant Response
	Solution: The applicant needs to provide an assessment of the impact of the panels which will not remain operational during a design flood event on the operation of the overall site and the energy created. The applicant should provide strong justification for the necessity of panels which are submerged in the design event. Additionally, the applicant should provide more detail of the mitigation being put in place to ensure the solar panels remain resilient during and after a design flood event.	As set out within the FRA (AS-051), the majority of the panels will be raised above the design flood level, providing a freeboard of 300mm in most cases. There are however, some localised positions where this is not possible as illustrated in Figure 3-10, for many of the areas, a freeboard is still provided but it is less than 300mm (meaning the panels would be above the flood level and not submerged). Only a small portion of the panels would experience flooding at their base and this has been measured to equate to 3% of the total panels, meaning 97% would not be submerged. The panels will be designed and constructed to remain operational during the design flood event (in line with the requirements of NPS EN-1) however, for safety and to be precautionary, should this 3% of the panel area experience flooding, then these will be switched off. However, 3% is considered to be a small proportion of the panel areas and will have a very low to negligible impact on energy generation. For context, this is not considered to be any worse that the variable nature of weather and its impacts on energy outputs (such as cloud cover). Furthermore, the probability of the flood event (i.e. 1 in 100 year probability with

Relevant Representation Number	Representation	Applicant Response
		climate change) is considered low and omitting panels in these areas for this low probability event is not considered proportionate. Furthermore, reviews of the EA historic flooding records for the area indicate that flooding has occurred between November and March, which aligns with the timings of most recent flooding in January 2024. With the majority of energy generation being produced between April to October and historic records suggesting flooding is more likely to occur outside of these months, the impact on energy generation is considered to be minimal. As the flood modelling was for 1 in 100 years (plus Climate Change Allowance), the Applicant deems that the risk of flooding is suitably low, and controls are in place, allowing for this space to be used effectively in the generation of clean energy to support the UK's delivery of Net Zero.

Relevant Representation Number	Representation	Applicant Response
		The panels frames will be designed to withstand debris impact as required. Within the Site's operation and management strategies, details for maintenance actions to be taken at regular intervals and following a flood event will be outlined. This will be confirmed at detailed design however, it Is anticipated that this will include the following: • Clearance of any debris collected on fences, paths, roads and between panel supports. • Inspection of panel supports and fences to ensure structural integrity. Should any issues be observed, then remediation measures will be implemented. Refer to Section 3.1.5 of the FRA [APP-095] for clarity.

Relevant Representation Number	Representation	Applicant Response
RR.063	Topic: Voided structure Document Reference Appendix 7.2: Flood Risk Assessment (FRA) and Outline Drainage Strategy February 2025 Issue Reference EAFR-002 Issue: It is proposed to use voids under inverter stations within the design flood event to mitigate for the increased footprint within the floodplain. Voids should be a last resort option for mitigation once all other options have been exhausted. Impact: This may cause increases in offsite flood risk due to blockages and reduce the free flow of flood waters.	The approach to raise the inverters with voided structures beneath was discussed in meetings with the EA and agreed to. Please refer to the following: • Third Flood Risk Meeting – Item 4.1 summarising that inverters would be raised with voided structures. Item 4.2 with the response from EA, indicating this was agreeable. Refer to Appendix A3 of the FRA [APP-095] for details of the meeting minutes. Within the Site's operation and management strategies, details for maintenance actions to be taken at regular intervals and following a flood event will be outlined. This will be confirmed at detailed design however, it Is anticipated that this will include the following: • Clearance of any debris collected beneath the voided structure.

Relevant Representation Number	Representation	Applicant Response
	Solution: The applicant should assess other options of mitigation for the built footprint within the design event. Voided structures could be used for resilience but should not be used as mitigation. If all other options for mitigation are not viable, the applicant needs to provide strong justification for the void structure and assess the risk if they were to become flooded. Additionally the applicant should provide a maintenance plan for the voided structures.	• Inspection inverter supports to ensure structural integrity. Should any issues be observed, then remediation measures will be implemented. Refer to Section 3.1.5 of the FRA [APP-095] for clarity. Post submission discussions with the EA regarding the approach to raising of the inverters is ongoing.
RR.063	Topic: Construction Document Reference: Appendix 7.2: Flood Risk Assessment (FRA) and Outline Drainage Strategy February 2025 Issue Reference EAFR-003	Construction works are to be undertaken in line with best practice and the processes outlined within the oCEMP [APP-176]. This will include the following:

Relevant Representation Number	Representation	Applicant Response
	Issue: The applicant has not provided any assessment of the impacts the construction phase of the development will have on flood risk. Impact: Temporary flood risk increases may occur and impact 3rd parties. Solution: The applicant needs to provide details of the storage of materials, site compounds, temporary roads and/or crossings. An assessment of the impacts this may have on flood risk should be assessed and appropriate mitigation provided.	• Locating construction compounds outside of the floodplain wherever possible, ensuring there is no impact on floodplain storage or flood flows. There may be some locations where this is not possible and in these cases, the oCEMP will set out measures to ensure that compounds are set out to not impede flows and are fenced appropriately to ensure that flood flows can continue unimpeded and prevent potential debris being washed away and causing blockage risks outside of the Order Limits. • Ground levels during construction will not be raised, with the exception of temporary spoil from excavations. These spoil heaps will be local and temporary in nature and will be moved to locations outside of the floodplain as soon as possible, to ensure there is no loss in floodplain storage. • As part of the oCEMP, temporary measures to manage surface water runoff from any hardstanding areas will be put in place. This will include attenuation features to reduce the rate of runoff where appropriate, and manage any potential silts/pollution. This will ensure that any increases in runoff volume and potential increased flood risk outside of the Order Limits are mitigated against, alongside ensuring that water quality is maintained.

Relevant Representation Number	Representation	Applicant Response
		Impacts on flood risk during construction were addressed within Chapter 7, Section 7.6 [APP-036].
RR.063	Topic: Interactions with defences and watercourses Document Reference Appendix 7.2: Flood Risk Assessment (FRA) and Outline Drainage Strategy February 2025 Reference EAFR-004 Issue: Currently the applicant has not supplied details of any crossings, both above ground and below ground. Some of these may interact with flood defences. Impact: This may lead to adverse impacts on watercourses and/or flood defences.	There will be no above ground cable crossings over any main rivers as part of the proposals (i.e. the River Trent). The cable crossing beneath the River Trent (and ordinary watercourses) will be undertaken using trenchless techniques and will include the following: • A pre-works hydro morphology survey will be carried out for each watercourse to ensure the correct depth for passing under the watercourse. • A tidal riverbed survey will be required prior to the works under the River Trent.

Relevant Representation Number	Representation	Applicant Response
	Solution: The applicant needs to provide a map and detailed designs for all new crossings and show an assessment of the impacts this may have on flood defences and water courses.	• A site-specific fracture risk assessment will be produced prior to commencing works to define the methodology and mitigation required on ground conditions. • For the cable route crossings, the launch and receiving pits will typically be a maximum size of 120m x 80m and 50m x 70m respectively, subject to detailed design. • The launch and receiving pits will be a minimum of 10m from the watercourse edge. • The cable route crossing of the River Trent will be a minimum of 5m below the bed of the river. • For other smaller watercourses, the crossing will be a minimum of 1.5m below the bed of the watercourse.

Relevant Representation Number	Representation	Applicant Response
		• There is a small risk of drilling fluid break out from drilling to the watercourse if not appropriately mitigated for site specific conditions. A site-specific hydraulic fracture risk assessment will be produced as part of the CEMP prior to commencing works to define the mitigation required based on ground conditions. Also included in this CEMP will be a bentonite fluid breakout plan and an emergency spillage response procedure. The above the processes are outlined within Table 3.5 of the oCEMP [APP-176]. The provision of the hydro morphology survey and river bed survey will determine the cable crossing design to mitigate impacts to the watercourse. Although the trenchless solution and anticipated depth is anticipated to mitigate impacts to the existing defences, surveys of the defences can be undertaken at detailed design to confirm this and monitoring during construction can be undertaken if deemed required.

Relevant Representation Number	Representation	Applicant Response
		A map of the anticipated crossing route and sections has been provided however, given the outline nature, these do not represent detailed design.
RR.063	Topic: Maintenance and contingency planning Document Reference Appendix 7.2: Flood Risk Assessment (FRA) and Outline Drainage Strategy February 2025 Issue Reference EAFR-005 Issue: The applicant has not provided maintenance plans for the clearing of debris and upkeep of the panel legs which will be with in the design flood event. Additionally, the applicant had not provided details of a contingency plan if the legs of the panel's failure during a flood event.	The raising of the panels will be achieved through the use of slender frames meaning that the potential for debris blockages is kept to a minimum, and even if there were to be some minor obstruction, flood water would continue to flow. Furthermore, the panels frames will be designed to withstand debris impact as required. Within the Site's operation and management strategies, details for maintenance actions to be taken at regular intervals and following a flood event will be outlined. This will be confirmed at detailed design however, it is anticipated that this will include the following: • Clearance of any debris collected on fences, paths, roads and between panel supports.

Relevant Representation Number	Representation	Applicant Response
	Impact: This may cause the build-up of debris pushing flood waters offsite. Solution: The applicant should provide details of a maintenance plan for the clearance of debris and a contingency plan for times of a flood.	• Inspection of panel supports and fences to ensure structural integrity. Should any issues be observed, then remediation measures will be implemented. The above is referenced in Section 3.1.5 of the FRA [APP-095] for clarity. Should there be a failure of the panel frame and/or legs, these would be removed immediately once flood waters have receded adequately and would be replaced as soon as possible.
RR.063	Topic: Watercourse Crossings Document Reference Appendix 7.2: Flood Risk Assessment (FRA) and Outline Drainage Strategy February 2025 - Section 3.1.1 Existing Watercourses and Flood Defences page 16	Any bridging over watercourses would be limited to ordinary watercourses which are managed by either the Lead Local Flood Authority (LLFA) or Internal Drainage Board (IDB). Any bridging would be kept to a minimum and any openings required will be sized accordingly through discussions with the LLFA and/or IDB at the detailed design stage to ensure there would be no constraint to flows in the appropriate event.

Relevant Representation Number	Representation	Applicant Response
	Issue Reference EAFM-01 Issue: This section notes that bridging over watercourses to facilitate access may be required. Where this is the case openings will be sized accordingly to ensure there would be no constraint to flows. Impact: Crossings could be designed inaccurately if appropriate methods are not used to determine their size.	There will be no bridging over main rivers (i.e. the River Trent) managed by the EA.

Relevant Representation Number	Representation	Applicant Response
	Solution: Any proposed crossings should be designed so that the soffit level of any bridges sits above the design flood level. The design flood level for permanent crossings in this case would be the 1% (1 in 100) annual exceedance probability (AEP) plus higher central climate change scenario. For temporary crossings as part of the construction phase of the scheme the present day (without climate change) 1% (1 in 100) AEP scenario can be used. Careful consideration will need to be given to how the design flood level will be determined for any proposed crossings. Typically, this would be determined by undertaking localised hydraulic modelling or referring to existing detailed hydraulic modelling data (where available).	
RR.063	Topic: Flood Flows	The approach to the volume displacement assessment was discussed in meetings and post meeting discussions with the EA and agreed to. This included that hydraulic modelling was not required to inform the assessment. Please refer to the following:

Relevant Representation Number	Representation	Applicant Response
	Document Reference Appendix 7.2: Flood Risk Assessment (FRA) and Outline Drainage Strategy February 2025 - Section 3.1.5 Design Flood event and credible maximum scenario page 23 to 25 Issue Reference EAFM-02 Issue: This section notes that some solar panels will experience flooding (i.e. where depths are greater than 1.8 metres), and a map is presented in figure 3.9 which shows this. Table 3.2 shows the displacement volume, but this does not incorporate the solar panels which would be submerged during the design flood event as the calculation depth is to 1.8 metres. The solar panels themselves would represent a more notable impedance to flood flows than the support frames. The impact of this is not quantified within the Flood Risk Assessment.	• Third Flood Risk Meeting ○ Item 5.1.2 where the EA indicated that quantified methods other than modelling could be used. ○ Item 5.1.3 where the high level approach was discussed and agreed as reasonable. ○ Within the Post Meeting Note at the end of the document where the approach was agreed in greater detail. Within the post meeting discussion and the FRA, it is noted that the volume assessment is conservative, this is on the following basis: • It was assumed that all panels sit within the floodplain. In reality however, many of the panels do not lay within the floodplain and would not contribute to floodplain losses. • A conservative flood depth of 1.8m across all panels was assumed. It is worth noting however, that flood depths across many of the panel frames would be well below 1.8m

Relevant Representation Number	Representation	Applicant Response
	Impact: The impact of flood risk because of the development could be underestimated particularly in areas where the solar panels themselves are submerged. These areas are located near to West Wood (484500, 372650) and Carr Wood (484700, 372060). Solution: Please consider the impact on flood risk where solar panels are submerged in the design flood event (i.e. where freeboard is less than zero), for example around West Wood and Carr Wood as shown in figure 3.9 on page 23 of the Flood Risk Assessment. The most sensible way to understand these impacts would be to include these areas within the Tidal Trent (2023) hydraulic model as layered flow constriction layers or as areas of increased roughness so that the impedance on flood flows can be understood. Water level difference maps should be presented within the Flood Risk Assessment to show this impact.	Refer to Appendix A3 of the FRA (APP-095) for details of the meeting minutes. With the above in mind, and given that the losses observed currently equates to less than 1mm of increased flood depth, it is considered unlikely that the panels will result in increases of up to 5mm. However, for the avoidance of doubt, an assessment of the impact the flooded panels is currently being undertaken and the results of the assessment will be confirmed to the EA. With the above in mind and on the basis that the EA previously agreed that a volume assessment was appropriate, it is not considered necessary to undertake hydraulic modelling to confirm the impact on flood depth.

Relevant Representation Number	Representation	Applicant Response
RR.063	Topic: Catchments Document Reference Appendix 7.2: Flood Risk Assessment (FRA) and Outline Drainage Strategy February 2025 - Section 3.1.5 Design Flood event and credible maximum scenario page 24 Issue Reference EAFM-03 Issue: Table 3.1 on page 24 of the Flood Risk Assessment presents the fluvial 1% (1 in 100) annual exceedance probability (AEP) plus 39% climate change peak flow for the Fledborough Beck and an unnamed watercourse based on the ReFH2 approach. Whilst the principle of comparing this flow to the pluvial 0.1% AEP runoff is reasonable and the approach has been agreed, no information on the analysis catchment grid references are included within the Flood Risk Assessment.	Topic: Catchments Document Reference Appendix 7.2: Flood Risk Assessment (FRA) and Outline Drainage Strategy February 2025 - Section 3.1.5 Design Flood event and credible maximum scenario page 24 Issue Reference EAFM-03 Issue: Table 3.1 on page 24 of the Flood Risk Assessment presents the fluvial 1% (1 in 100) annual exceedance probability (AEP) plus 39% climate change peak flow for the Fledborough Beck and an unnamed watercourse based on the ReFH2 approach. Whilst the principle of comparing this flow to the pluvial 0.1% AEP runoff is reasonable and the approach has been agreed, no information on the analysis catchment grid references are included within the Flood Risk Assessment.

Relevant Representation Number	Representation	Applicant Response
	Impact: It is difficult to appraise the calculated peak flows for the Fledborough Beck and the unnamed ordinary watercourse as the catchment outlet grid references are not included within the FRA. Solution: Please include the grid references for the catchments where the ReFH2 peak flows were calculated within the Flood Risk Assessment. Please include the ReFH2 report as an appendix to the Flood Risk Assessment.	Impact: It is difficult to appraise the calculated peak flows for the Fledborough Beck and the unnamed ordinary watercourse as the catchment outlet grid references are not included within the FRA. Solution: Please include the grid references for the catchments where the ReFH2 peak flows were calculated within the Flood Risk Assessment. Please include the ReFH2 report as an appendix to the Flood Risk Assessment.

Relevant Representation Number	Representation	Applicant Response
RR.063	Topic: Private Groundwater Abstractions Document Reference Volume 2 Chapter 7: Section 7.4.11, Section 8.4.37 and Table 9 of 6.21 Appendix 8.2 Preliminary Risk Assessment - Part 1 Issue Reference EAGWCL-002 Issue: The EIA report discusses designated superficial and bedrock aquifer designations, groundwater Source Protection Zones (SPZs) and known groundwater abstractions. No reference is made to any private groundwater abstractions (if present) within the study area although some abstractions not licensed by the Environment Agency are presented and discussed. Where groundwater abstractions are discussed, it is unclear what information sources have been used.	The data presented in Volume 2 Chapter 7: Section 7.4.11 [APP-036], Volume 2 Chapter 8: Section 8.4.37 [APP-037] and Table 9 of Appendix 8.2 Preliminary Risk Assessment (Part 1) [APP-099] was derived from the dataset for water abstractions taken from the Envirocheck Environmental Database Search for the Order Limits (presented as Appendix C of Appendix 8.2 Preliminary Risk Assessment (Parts 1 to 6) [APP-099 to 104]. In addition, data were supplied by Anglian Water relating to their water abstraction locations (although this information was also included as part of the Envirocheck dataset). It is therefore confirmed that all the water abstraction points listed in Table 9 of Appendix 8.2 Preliminary Risk Assessment (Part 1) [APP-099] are from the Envirocheck dataset, with some of the locations also included in data provided by Anglian Water. All these features are classified as licensed water abstractions. The review of these datasets means that all licensed water abstraction points (groundwater and surface water) were considered as part of the baseline assessment.

Relevant Representation Number	Representation	Applicant Response
	Impact: Potential for private groundwater abstractions to be present which may not have been accounted for in the EIA. If these are known or presumed to be used for potable water abstraction these are assigned a presumptive 50m radius SPZ1. Solution: The Applicant should confirm the information sources used to determine the presence and details of groundwater abstractions, both private and public, within the Study Area. If this has not already been carried out, the Local Authorities should be contacted for details of any known private water abstractions. Additional Comments	Since reviewing this Relevant Response, the Applicant has requested datasets for licensed and unlicensed private groundwater abstractions from the local planning authorities. A request has also been made to the Environment Agency for an updated dataset of water abstraction locations from their records. Responses have been received as follows: • Lincolnshire County Council have confirmed that they do not hold a dataset of this type, and that the Environment Agency or Anglian Water should be consulted; • Nottinghamshire County Council confirmed that they do not hold a dataset of this type, and that the information would be held by the Environment Agency; • Bassetlaw District Council referred us to Nottinghamshire County Council to resolve this issue, as they did not hold their own set of records on this; • Newark and Sherwood District Council provided a set of records for their district, but this did not incorporate any locations within the Order Limits or study area;

Relevant Representation Number	Representation	Applicant Response
		• A response has not been received from West Lindsey District Council, but as the district is located within Lincolnshire, it has been assumed that the data would be held by the Environment Agency (as noted above); • A response from the Environment Agency with an updated dataset has yet to be received. Based on the information received to date, there are no additional datapoints to add to the sensitive receptors that were assessed in Volume 2 Chapter 8 [APP-037]. However, the updated records from the Environment Agency are still awaited, and will necessitate a review of the information, with amendments to be made to Volume 2 Chapter 8 [APP-037] and Appendix 8.2 Preliminary Risk Assessment (Part 1) [APP-099] if the records differ to those reviewed initially.

Relevant Representation Number	Representation	Applicant Response
		In addition to the review of the dataset, that will be completed when all information has been received, the mitigation measures that are incorporated in the Outline Construction Environmental Management Plan [APP-176], Outline Operational Environmental Management Plan [APP-177] and Outline Decommissioning Environmental Management Plan [APP-178] will ensure that any effects on groundwater receptors are minimised across the entire Order Limits, irrespective of whether the groundwater is of the highest sensitivity (ie used as a potable water source), or of lower sensitivity.
RR.063	Topic: Watercourse Crossings Document Reference 6.2.1 Volume 3 Appendix 7.5 Outline Operational Environmental Management Plan Issue Reference EAGWCL-008 Issue: There is no commitment to the production of a hydrogeological risk assessment for watercourse crossings.	A hydrogeological risk assessment will be produced for river/watercourse crossings prior to detailed design and suggest this is secured through condition.

Relevant Representation Number	Representation	Applicant Response
	Impact: Potential for unassessed impact to groundwater quality or flow, and/or to surface water quality resulting from trenchless installation beneath watercourse crossings. Solution: The Applicant should commit to the production of a hydrogeological risk assessment in addition to the stated documentation for river crossings. This should include a crossing-specific conceptual site model and confirmation of the composition of proposed drilling muds.	
RR.063	Topic: Buried Cable Decommissioning Document Reference 6.2.1 Volume 3 Appendix 7.6 Outline Decommissioning Environmental Management Plan Issue Reference EAGWCL-009	The Solar PV Site will be reinstated in accordance with the Outline Decommissioning Environmental Management Plan (oDEMP) [APP-178].

Relevant Representation Number	Representation	Applicant Response
	Issue: Section 1.1.6 identifies that the method of buried connection cable decommissioning will be established at the time of decommissioning, which would comprise either leaving cables in-situ or the removal of cables by pulling through from an extraction point. Impact: Potential for cables left in-situ to act as a source of groundwater contamination. Solution: The Applicant should demonstrate that cables left in-situ indefinitely would not pose a potentially significant source of contamination to controlled waters.	As detailed in the oDEMP [APP-178], cables left in situ after decommissioning would not impact the future agricultural use of the land, provided they were buried at a minimum 0.9m depth. Cables buried at least 1m below ground are expected to be left in place, and that approach is based on the Applicant's understanding (informed by use of cabling elsewhere and the approach taken on other similar schemes) that these cables would be unlikely to be considered as waste if left in the ground. The approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. However, recognising that industry practice and legislation may change by the time of decommissioning, the Applicant has made clear in the oDEMP that the approach will be confirmed at the time of decommissioning, based on government policy and best practice. Paragraph 1.1.6 of the oDEMP provides:

Relevant Representation Number	Representation	Applicant Response
		"*The mode of cable decommissioning for the grid connection and other underground cables will be dependent upon government policy and best practice at that time. Currently, the most environmentally acceptable option is leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open cut the entire length of the cable route.*" This current approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. The DEMP will need to be approved by the relevant planning authority pursuant to requirement 20 of the draft DCO, and the relevant planning authority would need to consult with both the Environment Agency and Natural England as part of the approval of the DEMP, meaning that there is the mechanism in place to ensure the EA has the opportunity to input to the approach at the time of decommissioning.

Relevant Representation Number	Representation	Applicant Response
RR.063	Topic: Water Supply Document Reference: Volume 6.0: Environmental Statement [EN010159]; Volume 1: Introductory Chapters; Chapter 5: Description of the Proposed Development; 7.6 Assessment of Likely Significant Effects (Construction) Public Water Supply 7.6.23-31 Issue Reference EAWR-001	If at detailed design, it is confirmed that potable water demand is in excess of 20m^3/day then a Water Resource Assessment will be produced prior to detailed design and suggest this is secured through requirement. As stated, it is at the applicant's risk if an adequate water supply has not been identified and secured ahead of construction commencement. Following completion of the Water Resource Assessment and should abstractions be required, these will be built into the construction programme.

Relevant Representation Number	Representation	Applicant Response
	Issue: Anglian Water has adopted a "Non-Domestic Water Requests Policy" for which it asks of applicants who require non-domestic water supply to complete a Water Resource Assessment to understand water demands, water efficiency measures and to effectively forecast water supply requirements. Communications around this moratorium are expected presently with AWS's most recent approach outlined in their dWRMP Statement of Response which sets out that the company may not be able to supply all new non-domestic demands until new strategic supplies are developed. We are pleased to see early engagement with AWS to ensure that supply can be achieved for the development's needs.	

Relevant Representation Number	Representation	Applicant Response
	Impact: It is at the applicant's risk if an adequate water supply has not been identified and secured ahead of construction commencement. We are encouraged by 7.6.23 which demonstrates that water efficiency has been considered. We are also pleased to see the evaluation of quantities required during construction in 7.6.24 however it is unclear which activities this demand represents.	

Relevant Representation Number	Representation	Applicant Response
	Solution: We recommend a Water Resources Assessment comprise of a water supply strategy to provide an options appraisal of sources of supply of water for all activities. In the event that Anglian Water cannot supply mains water, this will identify any abstraction licensing requirements under the WRA1991 and will enable the applicant to problem solve likely restrictions to water unavailability in what is a water stressed region. For example, existing abstraction identified in 7.6.28 from the River Trent may require licence changes and may be subject to restrictions which make water unavailable in prolonged dry weather and drought. This can be mitigated by the ability to store water to supply these periods if evaluated thoroughly during the planning and detailed design process.	

Relevant Representation Number	Representation	Applicant Response
	Additional Comments: We understand why water supply has been considered to be minor adverse based on the quantities estimated and the short term nature of the construction phase. We are concerned however about licensing requirements in relation to the construction programming. The applicant should be aware that abstraction licence changes or new applications are subject to a 3 month determination period (4 months if advertising is required).	
RR.063	Flood Risk	Noted.

Relevant Representation Number	Representation	Applicant Response
	The BESS and substation area are largely within Flood Zone 1 and outside the previous and updated Risk of Flooding from Surface Water extents. This gives confidence that the BESS and substation area are not at risk from the Ordinary Watercourses which bisect the site. Furthermore it is noted within the FRA that sensitive elements of the BESS and substation will be set to a level of 9 metres above Ordnance Datum (mAOD). This is considered reasonable and is well above the credible maximum water level and also above the breach water level at the BESS.	

RR.063	Source Protection Zones The EIA report identifies three groundwater SPZs within the study area near Dunham Bridge in Section 7.4.11; however, in Section 8.4.37 the report states that there are no groundwater SPZs within the study area. Furthermore, the appended Phase 1 Desk Study states in Table 9 notes that there are five SPZs associated with groundwater abstraction close to the River Trent, with the closest of the Zone 1 Inner Zones being partly inside the site boundary, despite this using the same site boundary as the EIA report and the related Figure 2: Land and Constraints Plan showing these zones outside the Order Limits. The report also refers to an apparently active groundwater abstraction point within the Order Limits, located at High Marnham Power Station, used for industrial processing. Our records do not indicate the presence of an active abstraction license at this location. Table 9 of the Preliminary Risk Assessment states the following: "There are 16 active licences for groundwater abstractions located on-site and within 1km of the site boundary. The majority of these are used in agricultural (for spray irrigation), with some associated with potable water supplies (operated by Anglian Water), several for private domestic use and one for industrial processing. A full list of	Section 7.4.11 of Volume 2 Chapter 7 [APP-036] states there are three groundwater SPZs within the study area near Dunham Bridge. The study area for Hydrology and Hydrogeology is set at 1km from the Order Limits, as defined in Section 7.3.1 of Volume 2 Chapter 7 [APP-036]. The study area presented within Section 8.3.1 of Volume 2 Chapter 8 [APP-037] is 250m. Although hydrogeological features are mentioned in Chapter 7 due to the interconnection between surface water and groundwater features, the assessment for the groundwater receptors is presented in Volume 2 Chapter 8 [APP-037], where the study area of 250m applies, therefore for the purposes of assessing groundwater receptors (SPZs) for the Proposed Development, these SPZs are outside the study area, and were not included in the assessment. The entry in Table 9 of Appendix 8.2 Preliminary Risk Assessment (Part 1) [APP-099] relating to SPZs was drafted in order to clarify why SPZs that were mentioned in the PEIR were no longer being considered at the EIA stage of this project. It would appear that this has resulted in confusion. The intention of the first paragraph was to state that five SPZs had been identified close to the Proposed Development during the earlier stages of assessment (ie where presented in the PEIR). The final sentence of the first paragraph states that due to boundary changes these five SPZs were now all outside the Order Limits, and outside the study area for groundwater receptors. The final sentence of the first bullet point should have been

Relevant Representation Number	Representation	Applicant Response
	abstractions is provided in Appendix D." No information source is provided for the listed abstractions either in Table 9 or Appendix D of the Preliminary Risk Assessment. These are assigned individual Envirocheck reference IDs, however no corresponding Envirocheck report appears to have been provided. Several of the groundwater abstractions listed in the Appendix are not shown in our records are not currently licensed by the Environment Agency. Furthermore, the list of abstractions in Appendix D includes 14 groundwater abstractions not 16 as stated in Table 9.	deleted ('The zone is partly inside and partly outside the boundary'), as this was no longer the case after the change to the Order Limits. The boundary for the Order Limits shown on Figure 2 is correct, as are the locations of the SPZs, which were retained on this drawing (despite being outside the Order Limits and study area) in order to confirm their locations were no longer within the study area, for any readers who were aware of their position from having read the PEIR.. The data source for all the water abstraction data presented in Volume 2 Chapter 8 [APP-037] and Table 9 of Appendix 8.2 Preliminary Risk Assessment (Part 1) [APP-099] is the Envirocheck reports obtained for the Order Limits, which are presented as Appendix C of Appendix 8.2 Preliminary Risk Assessment (Part 1) [APP-099].

Relevant Representation Number	Representation	Applicant Response
		With respect to some of the abstractions listed as being licensed not being recorded as such by the Environment Agency, this information was taken from the Envirocheck database, therefore it would appear that there is a discrepancy between the data held by the Environment Agency, and that presented in the Envirocheck report. Not all data fields are always completed for the water abstractions, and where a licence was not specifically listed as having an end date or being revoked or superseded, it was assumed to be active as part of the assessment, to ensure that all possible receptors were considered. If the Environment Agency are able to provide access to their records so that all these abstractions listed as licensed can be checked, and corrected where necessary, the Applicant will undertake that re-assessment and present an updated dataset. This is specifically referred to by the Environment Agency with respect to abstraction locations listed as being active in the submitted documents in the area of High Marnham Power Station which are not present in the Environment Agency's records.

Relevant Representation Number	Representation	Applicant Response
		Table 9 of Appendix 8.2 Preliminary Risk Assessment (Part 1) [APP-099] quotes that there are 16 groundwater abstraction locations that are licensed. Based on the data obtained from the Envirocheck report, these are listed in Appendix D of Appendix 8.2 Preliminary Risk Assessment (Part 1) [APP-099]. The Relevant Representation suggests that there are only 14 listed in Table D, but a review of this information shows 16 listed locations, referenced as follows: On-site locations 1 (Envirocheck reference 2B), High Marnham Power Station 5 (Envirocheck reference 2E), Ragnall- well Off-site locations 5 (Envirocheck reference 2G), Borehole C 7 (Envirocheck reference 2H), Borehole A 8 (Envirocheck reference 2H), Borehole D 9 (Envirocheck reference 2H), Borehole B 10 (Envirocheck reference 2H), Borehole E

Relevant Representation Number	Representation	Applicant Response
		13 (Envirocheck reference 3B), Lodge Farm 15 (Envirocheck reference 3C), Crow Wood 16 (Envirocheck reference 3C), Springwood Farm 23 (Envirocheck reference 3F), Kettlethorpe 27 (Envirocheck reference 4A), South Clifton 28 (Envirocheck reference 4B), Wigsley Park 29 (Envirocheck reference 4B), Clifton 33 (Envirocheck reference 4E), Carr Wood 34 (Envirocheck reference 4E), Moor Farm With respect to Envirocheck reference IDs, the Envirocheck reports were obtained as four separate reports (numbered 1 to 4), for the NW, SW, NE, and SE sections of the Order Limits. Each of the reports is subdivided into sections referenced by letter, as summarised below:

Relevant Representation Number	Representation	Applicant Response
		North West area of Order Limits: number 1, subdivided into A to D South west area of Order Limits: number 2, subdivided into A to H North east area of Order Limits: number 3, subdivided into A to F South east area of Order Limits: number 4, subdivided into A to F This information is most clearly viewed on the index maps for each of the Envirocheck reports, but unfortunately some pages from the Envirocheck reports do not appear to be visible within the PDF reports for the correct sections, so it is possible that these pages cannot be viewed. Copies of the specific pages can be provided to assist with resolving this issue.
Land Agreements		

Relevant Representation Number	Representation	Applicant Response
RR.063	Topic Required Environment Agency permits and licences Document Reference Schedule of Other Consents and Licences - EN010159/APP/5.4 Issue Reference EAGCC-001 Issue The list of consents and agreements may not be conclusive and, depending on situations encountered, others may be needed that have yet to be identified, for example, relating to waste management. Impact There is a risk of delays to the delivery of the Scheme where consents and agreements are insufficiently comprehensive to allow the Environment Agency to effectively deal with permit applications, queries and fully understand what the project requires.	The Applicant acknowledges the Environment Agency's comments regarding the potential requirement for additional consents and agreements. The project also recognises the importance of early and ongoing engagement with the Environment Agency to ensure the timely delivery of the Scheme. The Applicant is aware and has detailed a list of additional Consents likely to be required, within the Schedule of Other Consents and Licences [APP-167]. This document will continue to be reviewed and refined as the design and consenting processes evolve. The Applicant is also discussing Protective Provisions with the Environment Agency as part of the Development Consent Order (DCO) process, with a view to reaching agreement as to the disapplication of the need for some consents, as drafted in Article 6(1) of the draft DCO [APP-007]. The project welcomes the Environment Agency's recommendation to seek pre-application advice and will continue to engage proactively to ensure that all necessary consents, agreements, and supporting management strategies are identified and progressed in a timely manner.

Relevant Representation Number	Representation	Applicant Response
	Solution The Applicant should review the Consents and Agreements Position Statement document and further consider what is required. To avoid any delays during the project the Applicant should ensure that the Schedule of Other Consents and Licences comprehensively covers a range of scenarios that may, or may not occur, insofar as it is possible. Additional Comments We recommend early engagement and pre-application advice is sought to ensure that all the consents, agreements and supporting management strategies are in place and issued without undue delay.	

RR.060	The proposed OESF DCO requires the use of compulsory acquisition powers to permanently acquire rights over land owned by JG Pears Group. JG Pears believes that the rights needed by the promoter to the OESF DCO are predominantly to acquire an easement strip for an underground electricity cable connection into National Grid's proposed High Marnham substation. However, the area over which it is proposed these rights will be acquired is significant (i.e. over 1.3 million square metres/320 acres) and is clearly an excessive use of powers of compulsory purchase. The "ring-fencing" of such large areas prevents JG Pears Group being able to carry out its own business plans on its land and effectively sterilises the whole of the JG Pears land from future development. JG Pears Group position is that the rights sought by OESF DCO across JG Pears Group land should be limited to an easement strip up to National Grid's proposed High Marnham substation and no more. Additionally, it is noted that OESF DCO is seeking to acquire permanent rights across JG Pears Group's land, when the OESF DCO itself is being sought for a period of 60 years. The acquisition of permanent rights in this regard is over and above what is necessary for the delivery of OESF DCO	The Applicant acknowledges JG Pears Group's understanding that the rights sought under the proposed development DCO are primarily for the installation of an underground electricity cable connection into National Grid's proposed High Marnham substation, and confirms that this is correct. While the area identified for the acquisition of rights may appear extensive, the powers under Article 23 of the draft DCO [APP-007] are strictly limited to the acquisition of rights and the benefit of restrictive covenants for the purposes set out in Schedule 8 of the draft DCO [APP-007], and cannot be used to acquire land beyond what is necessary for those defined purposes. The wider area has been identified to provide construction flexibility, which is standard practice for linear infrastructure projects, and it is not the intention to acquire entire plots or fields. As explained in the Statement of Reasons [APP-190], it is not practical at this stage to seek only the final easement width due to construction requirements and the current uncertainty around the precise cable route. Typically, a working width of up to 50metres is required during construction, with a permanent easement of approximately 10 metres in width for a 400kV cable, and the final rights acquired will be limited to the "as-laid" route of the cable. The routing and design of the cable connection remain dependent on the final location and layout of National Grid Electricity Transmission's (NGET) substation, which is still undergoing the consenting process. Accordingly, a degree of flexibility is required to accommodate any variations that may arise during NGET's planning and consenting process.

	and is therefore an excessive use of the powers of compulsory purchase. The permanent acquisition of rights for the implementation of the proposed OESF DCO would significantly impact JG Pears Group's land and business, in that it would sterilise its whole site and prevent any future development, as JG Pears Group look to implement its strategy of growth through renewable energy, which JG Pears Group has worked tirelessly to gain representation for renewable energy development in the recently adopted Local Plan. This includes the part of the site on which National Grid's proposed High Marnham substation is proposed to be located, which will also subject to the compulsory rights sought by OESF DCO. The OESF DCO lacks clarity and detail as to the rights and works that will affect JG Pears Group's land, with very wide ranging and generic rights applied across the whole OESF DCO, which clearly are not all relevant where the rights to install an underground cable are what is required on JG Pears Group land. The rights sought again therefore go beyond what is necessary and are an excessive use of compulsory purchase powers.	With regards to the longevity of permanent rights being sought through the DCO, there is no statutory ability to time limit permanent rights acquired through compulsion. It is therefore not possible to time limit the permanent rights sought over the respondent's land to 60 years. As noted in this response, commercial negotiations are ongoing with commercial points such as this forming part of those discussions. The Applicant is committed to continuing discussions with JG Pears Group to address any concerns regarding the duration and scope of these rights and to seek a mutually agreeable outcome where possible. The Applicant also recognises the concerns raised about the potential impact on JG Pears Group's land and business, particularly in relation to its aspirations for renewable energy development. However, the inclusion of land within the Order limits does not in itself sterilise the site. The area in question, including the proposed location of the High Marnham substation, remains subject to ongoing design and consenting processes, and the Applicant is working closely with NGET to ensure that access points and routing are appropriately designed to minimise impact. The Applicant is committed and is continuing to engage with JG Pears Group throughout this process to explore opportunities to reduce disruption and accommodate, where possible, the Group's future development plans. To date, six meetings have been held with the JG Pears Group, including two on-site visits. In addition, there has been continuous dialogue since 2nd July 2021, including but not limited to, agreeing to J G Pears Non-Disclosure

	Additionally, it appears from the Works Plans which accompany the OESF DCO application, that rights for Work No.4 of the OESF DCO are required across JG Pears Group's land, but this is not set out in the draft DCO itself (with specific reference to Schedule 8 and the land over which rights are to be acquired). This generalised approach to the acquisition of rights across large swathes of land, with no specific detail or clarity is not appropriate and results in significant land becoming sterilised from future development, creating a significant claim for compensation, which it appears the promoters of OESF DCO have not fully considered. JG Pears Group note that the application documents for the proposed OESF DCO state that negotiations between the parties in relation to the voluntary acquisition of rights has been ongoing since January 2022. This is untrue. An initial discussion took place between J G Pears Group and PS Renewables in early 2021 relating to PS Renewables acquiring JG Pears Group land at High Marnham. However, no formal discussions or attempts were made to answer questions JG Pears Group raised at the time nor where attempts made to secure an easement with JG Pears Group until after the OESF DCO application had been	Agreement, a full project overview, Project Offers, Site Proposals, providing Cable Heads of Terms for review and providing Confidentiality Agreements. The Land Rights Tracker [APP-011] will be updated to reflect the additional and continuous level engagement held with the J G Pears Group. Where impacts on land use and development potential do arise, these will ultimately be addressed through the compensation framework provided under the DCO regime. The project would also welcome further detail from JG Pears Group regarding its renewable energy strategy and any concrete development proposals, so that these can be properly considered as part of our ongoing engagement. The Applicant acknowledges JG Pears Group's concerns regarding the perceived lack of clarity and specificity in the rights and works proposed under the OESF DCO. While we understand that the rights sought may appear broad in scope, it is important to again clarify that the exercise of compulsory acquisition powers under the DCO is strictly constrained by the statutory framework in line with Article 23 and Schedule 8 of the draft DCO. These rights are not applied indiscriminately across the Order limits but are tied to specific works packages and purposes, including the installation of underground cables. In relation to Work No. 4 (WN4), the rights sought over land are aligned with the relevant works packages, and this relationship is

	submitted. Such communication has been limited to a letter, including Head of Terms not previously discussed, sent on 17th February 2025 following a brief call on 24th January 2025. Our client has since rejected the Heads of Terms, which also lacks clarity on the easement strip required, thereby applying to the whole of JG Pears Group's circa 320 acres of land. A non disclosure agreement has very recently been received from the promoters of OESF DCO (on 9th May 2025), but further discussions as of 15th May have not taken place. There has therefore been very limited engagement, which is contrary to guidance that states that those seeking to use compulsory purchase are encouraged to engage and communicate regularly with those who are to be affected by the use of powers of compulsory purchase. Clearly this has not been the case in relation to OESF DCO. The promoter should also have made proper attempts to acquire the rights sought under the OESF DCO by voluntary agreement. Unfortunately, the only attempt made, by way of the terms offered in the Heads of Terms dated 17th February 2025, are inferior to JG Pears Group position under the Compensation Code following compulsory purchase of rights and are inferior to negotiations JG Pears	documented in supporting materials such as the Land Plans [APP-013], Works Plans [APP-014], and the Land Rights Schedule [APP-011]. The project encourages the JG Pears Group to review the Land Rights Tracker [APP-011], which should assist in aligning the rights sought with the specific works proposed, including WN4. The approach taken reflects standard practice for nationally significant infrastructure projects, where a degree of flexibility is required to accommodate detailed design and construction requirements, particularly where the final routing of infrastructure such as underground cables is not yet fixed.

Relevant Representation Number	Representation	Applicant Response
	Group have had with other developers who have sought easements across J G Pears Group land. Therefore, to date, there has been no proper attempt to acquire the rights sought voluntarily.	
Land & Soils		
RR.063	Topic Previously Unidentified Contamination Document Reference 3.1 Draft DCO Issue Reference EAGWCL-001	The Applicant considers this approach for unexpected contamination is appropriately and adequately secured by the oCEMP, rather than as a requirement. The Applicant already includes requirement 21, as is noted by the EA. That requirement is included due to the potential for contamination in a specific area of the Order Limits, as identified in the ES.

Relevant Representation Number	Representation	Applicant Response
	Issue Requirement 21 (2) of the Draft DCO states the following: (2) If, during the carrying out of the authorised development in the area for site investigation [described as the area around the High Marnham power station as shown on the hatched blue on the land and soils constraints plan included in the preliminary risk assessment at appendix 8.2 to chapter 8 of the Environmental Statement], contamination not previously identified is found to be present within such area(s), no further development (unless otherwise agreed in writing with the relevant planning authority) must be carried out on the area(s) on which the contamination has been found until a remediation strategy detailing how such contamination must be dealt with has been submitted to and approved by the relevant planning authority.	The additional text sought to be included is purely precautionary and there is no specific reason why it should be included in the requirement. The drafting of the DCO has followed good practice and the advice in the "Nationally Significant Infrastructure Projects - Advice Note Fifteen: drafting Development Consent Orders", including that "Mitigation may include adherence with control measures established through relevant management plans." The approach to requirements has been to keep the requirements in schedule 2 streamlined and to secure detailed measures in the management plans, as is standard and best practice across made Orders in particular for solar DCOs, as well as from a DCO drafting perspective. Compliance with measures contained within the management plans is secured by the requirements, and failure to comply would amount to a breach of the Order. The requirement to comply with the approved CEMP would include compliance with any processes or need for further approvals set out within it.

Relevant Representation Number	Representation	Applicant Response
	Impact If contamination not previously identified is encountered in other areas of the Proposed Development outside the 'area for site investigation' this would not be subject to the same controls, which could result in detrimental impacts to controlled waters. Solution We recommend that Requirement 21 (2) is rephrased to incorporate all parts of the Proposed Development, not just that of the area for site investigation.	There is precedent for an unexpected contamination requirement on the face of the Order, however whilst there are some examples in more rural locations, the majority of the examples are Orders in industrialised areas or non-rural areas with greater scope for contamination, for example Net Zero Teesside, orders in areas in existing ports, Thames Tideway Tunnel. A requirement of the type sought has not tended to have been used in made solar DCOs to date.
RR.063	Topic WFD Classification Document Reference Volume 2 Chapter 8: Table 8.4 Groundwater magnitude of impact	The Applicant interpreted the phrasing in LA113 to indicate the following, which is what the Environment Agency has presumed was intended by the text presented in Table 8.4 of Chapter 8: Land and Soils [APP-037]:

Relevant Representation Number	Representation	Applicant Response
	Issue Reference EAGWCL-003 Issue The phrasing used in LA113 suggests that change in classification (e.g. deterioration from Good to Poor WFD classification) would be considered major adverse, but that change within a class would be considered moderate adverse. However, according to guidance (Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive - GOV.UK) where a water body already lies within the lowest (Poor) WFD status class, any deterioration is considered to be deterioration in status under the WFD. Under these circumstances any negative impact would be potentially considered major adverse. Furthermore, not all magnitude classes in LA113 refer to the likely impact on WFD waterbodies.	1. If a reduction in water body Water Framework Directive (WFD) classification occurred as a result of the Proposed Development *only*, this would be considered to be a major adverse effect. For example if activities associated with the Proposed Development resulted in a groundwater body being downgraded from good to poor quality. 2. If a reduction in water body WFD classification occurred as a result of multiple factors, one of which was the Proposed Development, this would be considered to be a moderate adverse effect (in terms of the effect due to the Proposed Development). The guidance from which the methodology in Table 8.4 is derived (Design Manual for Roads and Bridges, LA113: Road drainage and the water environment, 2020) does not include examples for the change in condition of water body WFD classifications relating to minor adverse or negligible effects. For a negligible effect, the example for the change to a water body WFD classification would be that there would be a negligible effect on the existing water body WFD classification.

Relevant Representation Number	Representation	Applicant Response
	Impact Potential for lack of clarity over the magnitude of WFD impacts posed by the Project. Solution Recommend that the applicant provides greater clarity over the proposed impact magnitude classifications regarding WFD waterbody status. Additional Comments We presume that the applicant's intended meaning is as follows: If the Project in isolation were likely to change a waterbody's WFD class from Good to Poor or prevent a waterbody from improving from Poor to Good this would be considered major adverse. If the Project in isolation were not sufficient to impose this magnitude of change but is likely to be a contributing factor to such a change, that this would qualify as a moderate adverse magnitude.	The example for change to a water body WFD classification for a minor adverse effect would therefore fall between a negligible effect and a reduction in classification that is only partly affected by the Proposed Development. Although this is not specifically assigned an example in the DMRB document, an appropriate example for this would be that there is a reduction in the quality of water within the water body, but the reduction is not sufficient to result in a change in the water body WFD classification. The Environment Agency has indicated that if the water body already has the lowest possible classification for its type, any degree of deterioration should be defined as a major adverse effect, based on the guidance provided in 'Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive' (2025). The Environment Agency has indicated that a deterioration in the status of the water body with respect to ecological or chemical status (for surface water bodies) or quantitative or chemical status (groundwater bodies) relating to a water body with WFD classification of 'poor' would fall under the definition of a major adverse effect.

Relevant Representation Number	Representation	Applicant Response
		The Applicant would respond that any change in status could result in a major adverse effect in line with this explanation, however, it should be noted that this does not consider the use of mitigation measures to remove or minimise the potential effects from the Proposed Development on the water body.
RR.063	Topic Groundwater Abstraction Points	The dataset presented with respect to groundwater abstraction points was obtained from the Envirocheck report, as presented in Appendix D of the Preliminary Risk Assessment report (**Appendix 8.2 [APP-099 to APP-104]**), which included datasets from the local authorities and the Environment Agency. Due to some discrepancies in the information held by the Applicant and the records held by the consultees, these data have been requested from the local authorities and the Environment Agency in order to ensure that any discrepancies can be resolved. This should include the provision of unlicensed private water abstraction locations, which were not incorporated into the Envirocheck dataset, as well as resolving any issues where licences indicated to be active are no longer recorded as being licensed.

	Document Reference Volume 2 Chapter 8: Section 8.4.38 Groundwater, Table 8.7 'Groundwater Abstraction Points' Issue Reference EAGWCL-004 Issue The report states that one groundwater abstraction point (at High Marnham Power Station, for industrial processing) is located within the Order Limits, and that one abstraction is located within the Study Area but outside the Order Limits. However, Figure 8.7 Groundwater Abstraction Points shows an additional abstraction point within the Order Limits. Impact Inconsistent baseline description. Potential for abstractions not to be considered by assessment. Solution The Applicant should ensure that baseline descriptions are accurate across the EIA. Additional Comments The additional indicative groundwater abstraction point 'Ragnall Well' is situated at approximate National Grid Reference (NGR) Easting 480400, Northing 373200 and is listed in Appendix D of the Preliminary Risk Assessment 'Phase 1 Desk Study: One Earth Solar Farm Ref.323323 R01 (01). This is indicated in the report to be used for 'general farming and domestic' purposes, therefore should be presumed to include potable use for the purposes of risk assessment. This abstraction does not appear in our records and is therefore presumed to be private.	It is noted that the Applicant has provided details of a private water supply located at Ragnall (national grid reference 480400 373200), which is shown in the Envirocheck report (Appendix D of the Preliminary Risk Assessment report, **Appendix 8.2 [APP-099 to APP-104])**, and displayed on Figure 8.7: Groundwater abstraction points **Figures 8.1-8.7 [APP-053]**), but is not included in the discussion and assessment presented in **Chapter 8: Land and Soils [APP-037]**. This location (a well at Ragnall) was omitted in error from the text, and its location shown on Figure 8.7 (**Figures 8.1-8.7 [APP-053]**) is correct. However, as it has been pointed out by the Environment Agency elsewhere that they do not have a record of a currently licensed groundwater abstraction point at High Marnham Power Station, this section will also need amending after receipt of groundwater abstraction records directly from the Environment Agency. It is therefore suggested that this response be provided in full after the updated datasets have been received from both the Environment Agency and the local planning authorities, to ensure that a correct revision of the text and assessment is presented.

Relevant Representation Number	Representation	Applicant Response
RR.063	Topic Piling Document Reference Volume 2 Chapter 8: Section 8.5.4	The concern of the Environment Agency that the potential for foundation excavation to result in mobilisation of existing contamination is noted, as is their indication that this is already addressed in other aspects of contamination control outlined in the OCEMP [APP-176]. The Applicant understands the importance of ensuring that existing contamination is not allowed to cause any adverse effects to the sensitive receptors, and this is robustly dealt with by the measures that are already outlined in the OCEMP, including the measures for dealing with unexpected contamination, and the requirement for a piling risk assessment. The Applicant does not consider that an additional form of risk assessment will improve on this already robust set of mitigation measures. As detailed in the oCEMP [APP-176], if contamination is identified during site investigation works, then the actions needed to remediate this will be determined and agreed with the local planning authorities and the Environment Agency, and this will ensure that any issues relating to contamination are dealt with in an acceptable manner as part of the existing framework of management plans.

Relevant Representation Number	Representation	Applicant Response
	Issue Reference EAGWCL-005 Issue The report commits to the undertaking of a piling risk assessment before the start of piling works, as detailed in the oCEMP. While it may be that other aspects of contamination control outlined in the oCEMP would address this, there is no current commitment to the production of a Foundation Works Risk Assessment (FWRA) for non-piling foundation works in areas where contamination may be present, such as the two identified landfills associated with the former High Marnham Power Station. Impact Potential for the construction of non-piled foundation structures in areas where soil/groundwater contamination are present to introduce new migration pathways if insufficiently managed. Solution The Applicant should commit to the preparation of a FWRA for any foundation works to be carried out in areas of known or suspected contamination. This could be secured as part of the oCEMP.	

Relevant Representation Number	Representation	Applicant Response
RR.063	Topic Source Protection Zones Document Reference Volume 2 Chapter 8: Table 8.7 Land, soil and groundwater receptors Issue Reference EAGWCL-006 Issue The report states that the existing secondary aquifers are not connected to SPZs and have therefore been assigned medium importance. The SPZs are presumed to be associated with the underlying Superficial Secondary A aquifers (Alluvium and Holme Pierrepoint Sand and Gravel Member). These extend onto the site and may be in hydraulic continuity.	The wording used in this section of the table can be clarified. It was not intended to suggest that there was no hydraulic connection between the on-site water within the aquifer, and any off-site groundwater source protection zones. The intended meaning was that the secondary aquifers that are present within the Order Limits are not also defined as groundwater source protection zones where they are present within the Order Limits. It is acknowledged by the Applicant that the off-site groundwater source protection zones are within the same geological units as the secondary A aquifers, it is simply that where these units are present beneath the Order Limits, they are not defined as groundwater source protection zones.

Relevant Representation Number	Representation	Applicant Response
	Impact Potentially misleading definition of baseline conditions – although this is unlikely to substantively affect the conclusions of the assessment and we agree that the assigned receptor sensitivity of 'medium' is appropriate. Solution The Applicant should consider rephrasing this statement to avoid indicating lack of connectivity between on-site aquifers and SPZs.	
RR.063	Topic Unexpected Contamination Sources Document Reference 6.2.1 Volume 3 Appendix 7.4 Outline Construction Environmental Management Plan, Appendix 7.6 Outline Decommissioning Environmental Management Plan Issue Reference EAGWCL-007	Based on the available baseline information on the potential contamination history of the Order Limits, and on the fact that information will be made available subsequent to intrusive investigation work in the area of the former High Marnham Power Station, it is considered that the provision of a watching brief in respect of unexpected contamination would not be necessary for the Proposed Development. This is not to suggest that this issue is not important to the Applicant, but to indicate that they feel that it is a proportionate and robust approach to ensure that the contractor will be required to investigate any encountered contamination during construction or decommissioning works.

Relevant Representation Number	Representation	Applicant Response
		It is acknowledged that the wording in the draft OCEMP [APP-176] and draft ODEMP [APP-178] did not specifically state that works should stop if any unexpected contamination was encountered, and therefore the draft documentshave been updated at Deadline 1 to be more specific on this point, and to state that the contractor would stop works locally, investigate the areas and assess the need for containment or disposal.

Issue Table 3.10 of the CEMP and Table 3.17 of the DEMP outline proposed mitigation and enhancement measures for controlling risks from waste generation, land contamination, airborne contamination and groundwater contamination. The listed measures do not include a watching brief for sources of contamination in areas where the potential for historic contamination has been identified, such as the former High Marnham Power Station and associated infrastructure and landfilling areas, potentially infilled historic ponds and mineral extraction pits, former railway land, farm developments and historic oil wells. Impact Potential for sources of existing contamination to be encountered during construction works without adequate measures in place to manage risks to controlled waters. Solution The Applicant should include a clear commitment to a land and groundwater contamination watching brief during earthworks and confirm that works would be locally halted if unexpected contamination sources are encountered, until the source is adequately investigated and remediation proposals agreed with the Local Authority and Environment Agency. Additional Comments The outline discovery protocol included in the table states the following: "Should

Relevant Representation Number	Representation	Applicant Response
	any potentially contaminated ground, including isolated 'hotspots' of contamination and/or potential deposits of asbestos containing materials (ACM), be encountered, the contractor(s) will be required to investigate the areas and assess the need for containment or disposal of the material. The contractor(s) will also be required to assess whether any additional health and safety measures are required." This does not currently indicate that works would be halted locally pending investigation and remediation if unidentified sources of contamination are discovered.	
RR.063	Groundwater & Land Affected by Contamination	The report presented in 6.2.1 Appendix 8.4 [APP-106] Preliminary Factual Site Investigation Results has now been superseded by the One Earth Solar Farm Ground Investigation Factual Report, which will be submitted at Deadline 1. The exploratory hole location plan is presented within this final version of the report (drawing reference CA-2372986-GI, sheets 1 to 3). Exploratory hole locations boreholes BH001 to BH013 and trial pits TP001 to TP012 are shown across these three drawings.

Relevant Representation Number	Representation	Applicant Response
	Errors and Omissions Preliminary Factual Site Investigation Results The appended report (6.2.1 Appendix 8.4 Preliminary Factual Site Investigation Results - Part 1) is in interim draft status, missing an exploratory hole location plan. Although figures showing the three areas in which ground investigations have been carried out are provided in Section 2.1, it is not possible at this time to identify where the exploratory hole records derive from. The report is therefore of limited value in establishing ground conditions and soil and groundwater contamination status at the current time and the updated factual and interpretative reports should be provided for review when available.	Chapter 7 - Hydrology and Hydrogeology [APP-036] will be updated to make reference to the groundwater quality assessment provided in Chapter 8 - Land and Soils [APP-037]. With regards to the WFD classification for the Lower Trent Erewash Groundwater Body, the Quantitative Status will be updated to 'Good' within the WFD Screening Assessment [APP-097]. This change is not considered to alter the outcomes of the WFD Screening Assessment as embedded mitigation is already proposed to ensure there will be no deterioration to the status of the groundwater body and limiting the potential entry of pollutants.

	Sensitive Receptors Volume 2 Chapter 7: Section 7.4.32 Sensitive Receptors does not identify groundwater (aquifers, abstractions, Source Protection Zones and Groundwater Dependent Terrestrial Ecosystems) as a potential receptor despite referencing potential sources of groundwater contamination and proposed groundwater mitigation measures including impermeable surfacing and are absent from Table 7.4: Summary of Significant Effects. Although groundwater is considered as a potential receptor in Chapter 8 this should also be identified and assessed as a receptor in Chapter 7, or reference should be made to the discussion of groundwater quality impacts in Chapter 8. WFD Classification Table 3.1 (Stage 1 Water Framework Directive Screening Assessment) provides a summary of the on-site Water Framework Directive Groundwater body (Lower Trent Erewash – Secondary Combined Water Body, water body ID GB40402G990300). The summary information is incorrect: The WFD groundwater body has a Chemical and Quantitative status of 'Good', and an overall water body status of 'Good'. The Applicant should correct this error and consider whether this materially affects the WFD Assessment.

Relevant Representation Number	Representation	Applicant Response
RR.085	1. Natural England has been working with the Project via environmental consultants Logika Group to provide advice and guidance since January 2024. This has included discussions around best and most versatile (BMV) agricultural land and soil function. Further information will be provided in the Statement of Common Ground which will be reviewed and developed between Logika Group and Natural England. 2.8 Soils and best and most versatile agricultural land Overall Natural England welcome the approach taken by the applicant and are satisfied with the survey methodology, assessment and Soil Management Plan (SMP). We have requested some further clarity on the longer term storage of soils and the approach if and when any concrete shoes are required for solar panel installation. These issues should be resolved where more information is provided. Further detail on our reasoning for this is given in Part II.	The Applicant notes alignment with Natural England on the matters raised.

Relevant Representation Number	Representation	Applicant Response
	Further review will be provided on the cumulative impacts to agricultural land and soil function at a later stage. 2.9 Natural England's overall conclusions Impacts to agricultural land and soil function have been adequately reviewed and mitigated. We have requested some further clarity on the longer term storage of soil and the use of concrete shoes, to ensure that the soil can be restored to its original Agricultural Land Classification (ALC) grade and retain its soil function at the decommissioning stage. If these issues are addressed, based on the information provided and reviewed in the ES, then we see no reason this application cannot progress to the Examination stage of the NSIP process.	
RR.085	Soils and best and most versatile agricultural land-NE08	Noted.

Relevant Representation Number	Representation	Applicant Response
	APP-032 6.3 Detailed soil sampling is noted and welcomed.	
RR.085	Soils and best and most versatile agricultural land- NE09 APP-037 8.2.1 As per Natural England's previous PEIR response (our ref 476290, dated 8th July 2024, paragraph 2.4) - The British Society of Soil Science has published the Guidance Note Benefitting from Soil Management in Development and Construction, which also contains useful guidance. Refer to the Guidance Note Benefitting from Soil Management in Development and Construction within the Technical Guidance used for Assessment and Soil Management Plan	The guidance has been followed as well as other industry standard guidance related to soil and agriculture as outlined in [APP-037].

Relevant Representation Number	Representation	Applicant Response
RR.085	Soils and best and most versatile agricultural land- NE10 APP-037 8.3.17 As per Natural England's previous PEIR response (our ref 476290, dated 8th July 2024, paragraph 2.8) - The temporary displacement of soil as a result of the underground cable installation and temporary haul and access roads/construction compounds can result in permanent land quality change and soil damage if undertaken inappropriately. Therefore, Natural England support the commitment to consider these impacts in the oSMP/SMP. This is required for consultees and decision makers to understand the extent (ha) and likely long-term impacts on agricultural land quality (ALC grade).	Soil handling of the cable route is outlined within the SMP [APP-182] as well as appropriate mitigation and management , permanent damage is not expected. The applicant has committed to return the soil backs to its prior condition therefore does not anticipate any long-term impacts on agricultural land quality. Soil storage is also outlined within the SMP [APP-182] which includes seeding soil bunds stored for periods longer than six months or over the winter.

Relevant Representation Number	Representation	Applicant Response
	Management of stored soils should also be considered in the operational phase and managed in accordance with a Soil Management Plan (SMP) – covered in later paragraph 8.5.18.	
RR.085	Soils and best and most versatile agricultural land- NE11	Restricting soil handling to April through to September is impractical. If sustained heavy rainfall (e.g. >10mm in 24 hours) occurs during soil handling operations, work must be suspended and not restarted until the ground has had at least a full dry day or agreed moisture criteria (such as 'drier than the plastic limit') can be met. Lighter soil (SHU A) can generally be moved at a higher moisture content without causing damage than a heavy soil. These measures can found outlined within the SMP [APP-182].

	APP-037 8.5.8 Reiteration: All soils should only be handled in a dry and friable condition, and it is expected that soil handling will be confined to the drier summer period (April through September) to minimise risk of soil damage. Soil handling should normally be avoided during October to March inclusive, irrespective of soil moisture conditions, because it will generally not be possible to establish green cover over winter to help dry out soils and protect them from erosion. This would minimise the need to recondition soils, which requires additional space and time. This is particularly important for land to be restored to agricultural use. Soil handling methods should normally be as specified as in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (including accompanying Toolbox Talks). A field suitable method for assessing whether soils are in a dry and friable condition based on plastic limits set out in Part One (Explanatory Note 4 – Table 4.2 provided below in Annex 1) of the Institute of Quarrying's Good Practice Guide for Handling Soils in Mineral Working, and this approach together with the associated rainfall protocols should be adopted.

Relevant Representation Number	Representation	Applicant Response
	Soils should only be handled in a dry and friable condition. The aforementioned guidance should be referenced and followed in the SMP. The full SMP should be informed by the oSMP and secured by requirement of the DCO.	
RR.085	Soils and best and most versatile agricultural land-NE12 APP-105 A detailed review of the data has been undertaken, and the presented data methodology appears reasonably robust, following the MAFF (1988) Agricultural Land Classification for England and Wales: Guidelines and Criteria for Grading the Quality of Agricultural Land.	The ALC survey was followed up to industry standards under the guidance of Simon McMillan who is an experienced soil consultant with 9 years of ALC experience and 30+ years of agriculture experience.

Relevant Representation Number	Representation	Applicant Response
	The name, qualification and experience of the lead surveyor undertaking the ALC survey work is not given. This is important to demonstrate the likely competence of the lead surveyor. Natural England suggest this is included in the report.	
RR.085	Soils and best and most versatile agricultural land-NE13 APP-182 3.1.3 There is potential for compaction to occur underneath panels that cannot be ameliorated utilizing traditional farm operations. Further information would be useful to clarify how compaction under the PV array will be considered during construction and does not continue during the operational lifespan.	Compaction is possible within the construction phase however mitigation is provided within the SMP [APP-182]. This includes topsoil stripping, use of matting and avoiding working in wetter conditions.

Relevant Representation Number	Representation	Applicant Response
RR.085	Soils and best and most versatile agricultural land- NE14 APP -182 3.1.4 As per Natural England's previous PEIR response (our ref 476290, dated 8th July 2024, paragraph 2.8) – All soils should only be handled in a dry and friable condition, and it is expected that soil handling will be confined to the drier summer period (April through September) to minimise risk of soil damage. This would minimise the need to recondition soils, which requires additional space and time. This is particularly important for land to be restored to agricultural use. Soil handling methods should normally be as specified as in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (including accompanying Toolbox Talks).	As outlined in the SMP [APP-182] if sustained heavy rainfall (e.g. >10mm in 24 hours) occurs during soil handling operations, work must be suspended and not restarted until the ground has had at least a full dry day or agreed moisture criteria (such as 'drier than the plastic limit') can be met. Lighter soil (SHU A) can generally be moved at a higher moisture content without causing damage than a heavy soil. However, restricting soil handling to April through to September is impractical.

Relevant Representation Number	Representation	Applicant Response
	Commitment to only working soils in a dry and friable condition is made within the oSMP. It would also be useful to restate this requirement within paragraph 3.1.4 for further clarity as this is the most important technique to avoid compaction and degradation of the soil function and grade.	
RR.085	Soils and best and most versatile agricultural land- NE15 APP-182 3.6.3 No reference is made to how soils are stored where this may be over 6 months. All storage bunds intended to remain in situ for more than 6 months or over the winter period should be grassed over and weed control and other necessary maintenance carried out. Clarity on how soil storage bunds are managed over periods of >6 months should be included in the oSMP.	All bunds which will be in place for more than 6 months will be sown with a low maintenance grass seed mix at a rate of 5g/m2 as outlined in the SMP [APP-182].

Relevant Representation Number	Representation	Applicant Response
RR.085	Soils and best and most versatile agricultural land- NE16 APP-182 4.2.5 The use of concrete bases would increase the impact on both agricultural land take and soil health through continued compaction. Natural England seek further clarification on the application of concrete shoes as bases. Would they be simply placed on top soils or would topsoil be removed and stored for restoration during the decommissioning phase?	In reference to solar foundations, concrete shoes, (where required) would be placed on top of the topsoil. However, the vegetation would be removed. Compaction remediation would be considered as part of the dEMP.
RR.085	Soils and best and most versatile agricultural land- NE17	Soil storage is outlined with SMP [APP-182], soil will be stored in bund heights no greater than 2m for topsoil and 3m for subsoil and seeded for storage over 6 months.

Relevant Representation Number	Representation	Applicant Response
	APP-182 5.3.12 It is assumed that if stockpiled correctly (in the right wetness condition), and subsequently shaped and seeded, the stockpiles can remain in place for many years with minor degradation - there is always a degree of anoxic conditions occurring in the centre, however these are quickly remediated upon soil spreading. The stockpiles would need to be maintained to avoid any growth of shrubs or trees. The SMP should be clear about how much soil has been stored and the need to replace the soils at decommissioning to secure a certainty of soil re-use.	
RR.085	Soils and best and most versatile agricultural land-NE18	No response required at this stage.

Relevant Representation Number	Representation	Applicant Response
	Natural England's review and response to the cumulative impacts to agricultural land and soil function will be provided at the next stage.	
Masterplanning, Landscape & Visual Impact and Glint & Glare		
RR.085	2.7 Connecting people with nature (National Trails, open access land and England Coast Path) Natural England welcome the work done to improve existing Public Rights of Way including the Sustrans route over Fledborough viaduct as well as to create new permissive paths for the lifespan of the Project. Further detail on our reasoning for this is given in Part II.	Noted. No response required.

Relevant Representation Number	Representation	Applicant Response
RR.085	Connecting people with nature APP-179 7.7 Outline Landscape and Ecology Management Plan paragraphs 4.1.12-16. Natural England welcome the provision of new permissive paths and improvements to existing pathways within the Order Limits including the Sustrans route. APP-186 7.14 Outline Public Right of Way Management Plan paragraph 3.2.1. We note access for people to PRoW will be maintained through management of PRoW during construction via the PRoW MP. Ensure the LEMP and PRoW MP are secured by requirement of the DCO.	A detailed Landscape and Ecology Management Plan and Public Rights of Way Management Plan will be provided for review and approval prior to commencement of the authorised development, as set out in Requirement 8 and Requirement 18 of the Draft DCO [APP-007].

Relevant Representation Number	Representation	Applicant Response
RR.119	The proposed Project would have one interface with the river, just north of Fledborough, covered by Work No. 4 and 5. The adjoining land is also covered by Work No. 8. In this location the river is a tidal waterway used by both large commercial vessels and for leisure purposes. As the navigation authority, the Trust is responsible for navigational safety. The river corridor is well used for leisure and recreation and the eastern riverbank carries the long-distance Trent Valley Way path.	Noted. No response required.
RR.119	Cable crossing of the river and surveys	We are able to confirm that the Outline Design Parameters [APP-172] can be updated to state "Installation of the 400kV cables beneath the River Trent will be at least 5m below the lowest surveyed point of the bed of the river and setback at least 10m from the water edge riverbank"

Relevant Representation Number	Representation	Applicant Response
	Our preferred methodology, identified in our Section 42 response, was for an under riverbed crossing using Horizontal Directional Drilling (HDD). We welcome the confirmation of the installation of the 400kV cables beneath the riverbed. However, we request that further clarification is provided in the Outline Design Parameters (ODP) wording: • recognising that riverbed depth will need to be established by survey, as discussed below; and • given that tidal river levels, and therefore water edge location, fluctuates, using the riverbank as a reference point to establish minimum horizontal setbacks. An example of text changes, to the ODP (page 10), addressing these issues are provided below: Installation of the 400kV cables beneath the River Trent will be at least 5m below the lowest surveyed point of the bed of the river and setback at least 10m from the water edge riverbank.	Engagement will be untaken with the CRT when undertaking the bathymetric survey, and confirmation of data sourced with CRT.

Relevant Representation Number	Representation	Applicant Response
	The Outline Export Cable Route Construction Method Statement is indicative only and identifies that trenchless methodology is likely either HDD or Tunnel Boring Machine (TBM) tunnelling. At this stage: • the exact location of the crossing; • the geological and geomorphological conditions of the riverbed and bank; and • the final crossing construction methodology; have yet to be determined. Therefore, the protective provisions requested enable the Trust to review the construction methodology of the crossing to ensure appropriate measures are put in place to protect navigation and users of the river.	

Relevant Representation Number	Representation	Applicant Response
	A bathymetric survey will be necessary, as identified in the Outline Construction Environmental Management Plan, to inform the river crossing detailed design/methodology, by establishing the geological substrate and associated datum level for use in calculating riverbed depth for cable clearance. This will mitigate potentially detrimental impacts on the integrity of the navigation channel and navigation safety. Trust Engineers will need to review the survey results and findings to ensure the relevant riverbed depth has been identified. Such surveys are likely to require the use of boats and/or floating platforms that could affect safe navigation. Therefore, survey methodology will also need to be reviewed through the protective provisions.	

Relevant Representation Number	Representation	Applicant Response
	The above comments are given without prejudice to other matters or comments that may be raised by the Trust at a later stage of the examination process. Please do not hesitate to contact me with any queries you may have.	
Protective Provisions		

RR.097	Interfaces between the project and AWS assets (underground and surface assets) AWS owns and operates the water supply and water sewerage infrastructure within the project area, other than where these are provided by Severn Trent. In locations where the project intersects with AWS assets, their protection and continuity of services to customers will be required. AWS considers that the protection of existing network assets in and near the project site can be secured through Bespoke Protective Provisions, to ensure that such works are in accordance with these provisions. For example, in Chapter 7 'Hydrology and Hydrogeology' of the Environmental Statement, paragraph 7.5.20 'Water Authority Assets' assumes stand-off distances (between 3 metres and 6 metres) to be applied to strategic supply mains operated by both AWS and Severn Water. However, at paragraph 7.6.20 'Surrounding Anglian Water and Severn Trent Water Mains' it states that AWS has recommended that bespoke stand-off distances are applied to the strategic supply mains of between 4 metres and 6 metres. AWS stand-off distances in the Bespoke Protective Provisions measured from the medial line of such apparatus are as follows. (a) 4 metres where the diameter of the pipe is less than 250 millimetres; (b) 5 metres where the diameter of the	The Applicant has engaged with AWS' solicitors to seek to agree Bespoke Protective Provisions to be included in the DCO. AWS's solicitors have provided the Applicant with a copy of AWS's standard protective provisions, which the Applicant has provided comments upon with a view to refining and resolving issues as far as possible. Updated protective provisions will be included in the DCO in due course. Chapter 7 of the Environmental Statement [AS-053] will be updated with the appropriate offsets as agreed.

Relevant Representation Number	Representation	Applicant Response
	pipe is between 250 and 400 millimetres, and (c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres. This re-affirms the importance of agreeing Bespoke Protective Provisions rather than relying on assumptions made as to any stand-off distances and which may be inconsistent within the technical reference documentation.	

Relevant Representation Number	Representation	Applicant Response
	Through previous consultation stages, AWS has identified some notable assets within or in the vicinity of the order limits. There are a number of existing underground assets, including strategic supply pipelines serving water abstraction locations. A completed land interest questionnaire has been provided to the Applicant by AWS's Estates Team. This confirms details of above ground assets and formal easements which may be affected. These include the Newton on Trent Water Treatment Works (WTW) off the A57/ Dunham Road and the Hall WTW and Hall Water Reservoir located on either side of the A1133 north of the village of North Clifton	

Relevant Representation Number	Representation	Applicant Response
RR.097	A copy of AWS's template Bespoke Protective Provisions has been supplied. AWS would welcome further discussions regarding these as they have not been included in the draft DCO under 'Schedule 14 Protective Provisions' (application document APP-007) which is disappointing. AWS is obliged at this stage to object to the inclusion of the "standard" set of protective provisions for the benefit of statutory undertakers contained the draft DCO. AWS considers these to fall short of providing it with the necessary protections. Further reasons for Bespoke Protective Provisions are set out in more detail below. The submission of an agreed Statement of Common Ground (SoCG) would be beneficial. If no connections or interfaces with our assets are identified or specific arrangements are needed to be put in place, then it would be helpful to log this in an SoCG.	As above, the Applicant has responded to AWS' template Bespoke Protective Provisions and are keen to continue to refine and resolve any issues as far as possible through this process.

RR.119	The draft DCO and Protective Provisions The Trust thanks the applicant for the wording in article 6(1)(g) of the draft DCO ensuring the disapplication of legislation will not impact the Trust's functions relating to the river. In our Section 42 response we noted, at that stage, that we consider that protective provisions will be required due to the proximity to the River Trent. Such provisions are required to mitigate risks to the navigation from works during construction, maintenance and decommissioning phases. This is consistent with similar local nationally significant infrastructure projects (NSIPs) where such provisions were included in the DCO, given detailed design and methodologies are expected to be developed post consent. A set of proposed standard protective provisions for the Trust, based on those provisions in the recently made DCOs , including DCOs authorising underground cable crossings of the River Trent, were provided to the promoter with our Section 42 response. These were based on the Trust's understanding of the project, at that time.	The Applicant is engaging with the Canal and Rivers Trust to seek to agree protective provisions which will be included in the DCO. As noted, the Trust have provided the Applicant with a copy of the Trust's standard protective provisions, which the Applicant is currently reviewing, including the associated provisions regarding the requirement to have regard to the Trust's Code of Practice. The Applicant will provide the Trust with comments on their provisions in due course, with a view to refining and resolving issues as far as possible. Updated protective provisions will be included in the DCO in due course.

We still consider such provisions should be included in the DCO, noting that the final wording of them may require amending as the One Earth proposals are refined or altered further as the examination process.

Since the notification of this application, we have contacted the Promoter directly. Thus far they have confirmed they are available to discuss further, and that protective provisions within the DCO can be revised, as they still being negotiated with various parties. We anticipate meeting with them shortly with a view to including provisions for the Trust in the final DCO.
The Trust's Third-Party Works Code of Practice

As with other NSIPs including works that interface with the Trust's waterway network, any works with the potential to affect the navigation should be carried out in accordance with the Code of Practice for Works Affecting the Canal & River Trust ('CoP'). Our proposed draft protective provisions require the applicant to have regard to the CoP in its detailed survey, design and construction of relevant works.

The CoP is designed to protect the operation of the navigation, safeguard all users of it and to deal with

the nuances of developing underneath and adjacent to a waterway with a changeable tidal riverbed. Given the effect of tides and currents, the depth of the riverbed is not uniform and may have extensive layers of silt on top of it. Ensuring that development is appropriately located and controlled is crucial to limit the potential for risks to navigation and the associated economic, environmental and social consequences.

Through the CoP, developers engage with the Trust's engineers and other specialists in waterway engineering, navigational safety, the protection and safeguarding of the riverbed and ecology. It is essential that projects incorporate appropriate measures to protect navigation and the users of the river before, during and after construction, including during maintenance and decommissioning, for all temporary and permanent works affecting the navigation. This includes surveying and sampling within the river, and direct discharge of water to it, where this could affect the profile of the navigation channel and the safety of river users. Engaging with the Trust's engineers ensures the appropriate measures are taken.

At this stage, we envisage the protective provisions

Relevant Representation Number	Representation	Applicant Response
	and use of the CoP will deal with the Trust's concerns relating to matters that could affect the safety and operation of the navigation, noting that the river channel and adjoining land could be subject to a wide range of different works covered by Works No. 4, 5 and 8.	

RR.082	In light of the above interactions with the Project and various NGET projects, NGET require protective provisions to be included within the DCO to ensure that its existing and future assets and interests are adequately protected, as well as to ensure compliance with relevant safety standards. The recently granted Awel Y Mor Development Consent Order ("AYM DCO") provides a precedent for the protection of NGET future assets via protective provisions. The protective provisions secured in the AYM DCO ensured the protection of existing and future NGET infrastructure at the Bodelywddan substation. In that case, NGET was bringing forward a project to upgrade the existing Bodelwyddan substation comprising extending the substation itself as well as associated overhead line works to the south of the existing substation to enable the connection of multiple projects in this location. The AYM DCO project was just one of the connecting projects and therefore specific protective provisions were included in the AYM DCO to avoid those future NGET works from being prejudiced by the AYM DCO project. As such, NGET will seek a form of protective provisions based on those included in the AYM DCO. NGET is liaising with the Applicant in relation to	The Applicant has engaged with NGET's solicitors to seek to agree protective provisions which would be included in the DCO. NGET's solicitors have provided the Applicant with a copy of NGET's standard protective provisions, which the Applicant is currently reviewing. The Applicant will provide NGET with comments on their provisions in due course, with a view to refining and resolving issues as far as possible. Updated protective provisions will be included in the DCO in due course.

Relevant Representation Number	Representation	Applicant Response
	such protective provisions. Accordingly, NGET has not appended the version of the protective provisions it requires to be included in the Order to this Relevant Representation. However, NGET will submit these at Written Representation Stage, if not agreed between the parties by that point, with an explanation of any outstanding issues. NGET requests that the Applicant continues to engage with it in relation to how the Applicant's works pursuant to the Order (if made) will ensure protection for those proposed NGET assets, along with facilitating all future access and other rights as are necessary to allow NGET to properly discharge its statutory obligations. NGET will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions.	

RR.042	This response is submitted on behalf of Exolum Pipeline System Limited. We can confirm that our client's apparatus has been identified as being either within or in close proximity to the proposed scheme and we must therefore respond for the following key reasons: • The scheme has the potential to contravene Exolum's ability to Safely access and maintain its assets under their legal rights as set out in Part IV of The Energy Act 2013, and; • Due to the potential for breach(s) of the Health & Safety at Work Act 1974 with specific concerns around Regulation 15 of the Pipeline Safety Regulations 1996 and the potential for any subsequent work close to the High-Pressure Pipeline to impact both the Safety of the pipeline and those doing the work. Exolum requires protective provisions to be included within the Development Consent Order (DCO), if granted, to ensure that its apparatus is adequately protected and can continue to operate safely. We will provide you with our standard terms once the consultation process begins.	The Applicant has engaged with Exolum's solicitors to seek to agree protective provisions which would be included in the DCO. Exolum's solicitors have provided the Applicant with a copy of Exolum's standard protective provisions, which the Applicant has provided comments upon with a view to refining and resolving issues as far as possible. Updated protective provisions will be included in the DCO in due course.

Exolum and their appointed representatives are liaising and will continue to liaise with the Applicant regarding such bespoke protective provisions with a view to concluding the necessary agreements as soon as possible.

It is critical that all Construction and Design work affecting a High-Pressure Pipeline is discussed and agreed with Exolum. Our client must therefore be consulted to ensure the proposal has no impact on their apparatus. Their contact details are:

Exolum Central Services Ashdon Road Saffron Walden Essex CB10 2NF

Email: pipelinerow@exolum.com Tel: 01799 564101

Exolum reserves the right to make further representations as part of the Examination process in relation to specific interactions with its assets but in the meantime will continue to liaise with the Applicant with a view to reaching a satisfactory agreement.

We trust that these considerations and any future representations will be taken into account as part of

Relevant Representation Number	Representation	Applicant Response
	your consultation and the Examination process, and we look forward to concluding the necessary agreements.	
RR.082	Compulsory Acquisition Powers in respect of the Project Where the Applicant seeks powers of compulsory acquisition over NGET land or rights, the Protective Provisions must require that the Applicant obtain NGET's consent to any compulsory acquisition of any such land or rights. NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with its assets but in the meantime will continue to liaise with the Applicant with a view to reaching an agreed position.	The Applicant has engaged with NGET's solicitors to seek to agree protective provisions which would be included in the DCO. NGET's solicitors have provided the Applicant with a copy of NGET's standard protective provisions, which the Applicant is currently reviewing. The Applicant will provide NGET with comments on their provisions in due course, with a view to refining and resolving issues as far as possible. Updated protective provisions will be included in the DCO in due course.

RR.043	Northern Powergrid is in principle supportive of the One Earth Solar DCO project but has concerns relating to the impacts which the proposed scheme will have on Northern Powergrid's existing assets and any required improvement works. The red line boundary area of the Order includes Northern Powergrid infrastructure and thus the project has a direct impact on Northern Powergrid's existing critical national infrastructure which serves significant numbers of customers in the local and wider area. Northen Powergrid's rights for these assets are essential in maintaining an uninterrupted power supply to the customers they serve. The proposed development seeks to interfere with Northern Powergrid's existing apparatus and crosses NPG's overhead lines and underground cables both of which are vital for Northern Powergrid's existing operations. Northern Powergrid therefore reserves the right to review the position as the scheme progresses and protect its existing apparatus including with bespoke protective provisions in the Order, as at this stage, the specific details of the DCO infrastructure including the depth, diameter and respective easement strips are unknown.	In the Pre-application Land and Rights Negotiation Tracker **[APP-011]**, Northern Powergrid was identified as a party requiring protective provision, and standard utility operator protective provisions were included in the Draft DCO for the benefit of Northern Powergrid. Since submitting the DCO application, the Applicant has received contact from Northern Power Grid on 20 June 2025 regarding the negotiation of protective provisions. The Applicant will engage further with Northern Powergrid on this matter to confirm if a bespoke set of protective provisions is required, and if so, to seek alignment with Northern Powergrid on those provisions.

Relevant Representation Number	Representation	Applicant Response
	The compulsory purchase powers incorporated into the DCO seeks to acquire land and interests which, if acquired, would adversely affect Northern Powergrid's ability to use, access, maintain and where necessary upgrade its existing equipment. It is not necessary to acquire these interests where an agreement between the parties would be more appropriate. In addition to the technical impacts of the proposed development, Northern Powergrid has concerns over the proposed protective provisions contained within the draft Order as they do not take into account site specific issues and do not accord with Northern Powergrid's standard protective provision requirements. Northern Powergrid is keen to keep an open dialogue with One Earth Solar Farm ('the Applicant') to reduce the project's impacts on Northern Powergrid's apparatus and to engage with the applicant's legal representative to agree appropriate amendments to the protective provisions.	

RR.104	The Promoter seeks authority and powers in the draft Order to: a) permanently acquire rights over land in the ownership and occupation of Network Rail; b) permanently acquire rights over land in which Network Rail is an occupier in respect of rights. as summarised below: Freehold owner and Occupier in respect of the High Barnet Test Track - Permanent acquisition of new rights over 10083 square metres of disused railway, hardstanding, scrubland, copse (west of Ragnall Road) and National Cycle Route 647 (Plot 5-008); Freehold owner and Occupier in respect of sub-soil in respect of subsoil beneath half width of public highway - Permanent acquisition of new rights 1378 square metres of access splays, bridge carrying public road and verges over hedgerows (Ragnall Road) and National Cycle Route 647(Plot 05-010); Rights over third party land as stated in an Agreement dated 29 December 1959 – Permanent acquisition of new rights over 583093 square metres of scrubland, outbuildings, hardstanding,	The Applicant is engaging with Network Rail to seek to agree protective provisions which will be included in the DCO. The Applicant appreciates the inclusion of their standard provisions at Appendix 1 to their Relevant Representation, which the Applicant is reviewing and will provide comments on in due course, with a view to refining and resolving issues as far as possible. Updated protective provisions will be included in the DCO in due course.

grassland, tanks, car park, copses, hedgerows, drains, access roads and overhead electricity cables (High Marnham Substation) (plot 05-011);

Freehold owner in respect of subsoil beneath half width of public highway and rights in respect of railway apparatus – Permanent acquisition of new rights over 309 square metres of bridge carrying public road over disused railway (High Marnham Test Track) (Crabtree Lane) (Plot 07-002);

Rights over third party land as stated in an Agreement dated 29 December 1959 - Permanent acquisition of new rights over – Permanent acquisition of new rights over 8883 square metres of private road, verges and copse (east of Fledborough Road) (Plot 07-015);

Rights over third party land as stated in an Agreement dated 29 December 1959 - Permanent acquisition of new rights over 2829 square metres of electricity substation, hardstanding, copse and overhead electricity cables (High Marnham Substation) (Plot 08-003);

Rights over third party land as stated in an Agreement dated 29 December 1959 - Permanent

acquisition of new rights over 47380 square metres of electricity substation, outbuildings, hardstanding, access roads, tanks and overhead electricity cables (High Marnham Substation) Plot 08-004);

Rights over third party land as stated in an Agreement dated 29 December 1959 - Permanent acquisition of new rights over 16 square metres of hardstanding (High Marnham Substation) Plot 08-005);

Rights over third party land as stated in an Agreement dated 29 December 1959 - Permanent acquisition of new rights over 241 square metres of hardstanding and access track (High Marnham Substation) (Plot 08-006);

Rights over third party land as stated in an Agreement dated 29 December 1959 - Permanent acquisition of new rights over 521 square metres of electricity substation, hardstanding, outbuildings and pylons and overhead electricity cables (High Marnham Substation) (Plot 08-007);

Rights over third party land as stated in an Agreement dated 29 December 1959 - Permanent acquisition of new rights over 1806 square metres

of electricity substation, outbuildings, hardstanding, access road and overhead electricity cables (High Marnham Substation) (Plot 08-008);

Rights over third party land as stated in an Agreement dated 29 December 1959 - Permanent acquisition of new rights over 252 square metres of grassland (High Marnham Substation) (Plot 08-009); and

Rights over third party land as stated in an Agreement dated 05 June 2001 - Permanent acquisition of new rights over 12124 square metres of agricultural land, shrubbery and verges (Skellingthorpe Walk) and National Cycle Route 647 (Plot 14-019).

Network Rail wishes to ensure that the Scheme will not have a detrimental impact on the operation of the Railway and that the safety of the Railway is maintained during the construction, operation and ongoing maintenance requirements of the Scheme.

As the Promoter proposes to compulsorily acquire new rights over railway land as well in close proximity to railway assets, Network Rail hereby

objects to the making of the Order in principle on the ground that the powers sought are likely to interfere with the safe and efficient operation of the Railway and cause a serious detriment to the carrying on of Network Rail's statutory undertaking.

In order for Network Rail to be in a position to withdraw its objection Network Rail will require adequate protective provisions to be included within the Order (and for the avoidance of doubt Network Rail require these Protective Provisions to be in the form set out at Appendix 1 to this Relevant Representation) and an agreement with the Promoter to ensure that the new rights sought are exercised in regulated manner to prevent adverse impacts to the Railway.

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

Network Rail hereby requests that the Examining

Relevant Representation Number	Representation	Applicant Response
	Authority treats Network Rail as an Interested Party for the purposes of the Examination and Network Rail reserves the right to produce additional and further grounds of concern when further details of the Scheme and its effects on Network Rail's assets are available.	
Safety		
RR.063	Topic Buried Cable Decommissioning Document Reference 6.2.1 Volume 3 Appendix 7.6 Outline Decommissioning Environmental Management Plan Issue Reference EAGWCL-009 Issue Section 1.1.6 identifies that the method of buried connection cable decommissioning will be established at the time of decommissioning, which would comprise either leaving cables in-situ or the removal of cables by pulling through from an extraction point.	The Solar PV Site will be reinstated in accordance with the Outline Decommissioning Environmental Management Plan (oDEMP) [APP-178] As detailed in the oDEMP [APP-178], cables left in situ after decommissioning would not impact the future agricultural use of the land, provided they were buried at a minimum 0.9m depth. Cables buried at least 1m below ground are expected to be left in place, and that approach is based on the Applicant's understanding (informed by use of cabling elsewhere and the approach taken on other similar schemes) that these cables would be unlikely to be considered as waste if left in the ground.

Relevant Representation Number	Representation	Applicant Response
	Impact Potential for cables left in-situ to act as a source of groundwater contamination. Solution The Applicant should demonstrate that cables left in-situ indefinitely would not pose a potentially significant source of contamination to controlled waters.	The approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. However, recognising that industry practice and legislation may change by the time of decommissioning, the Applicant has made clear in the oDEMP that the approach will be confirmed at the time of decommissioning, based on government policy and best practice. Paragraph 1.1.6 of the oDEMP provides: "*The mode of cable decommissioning for the grid connection and other underground cables will be dependent upon government policy and best practice at that time. Currently, the most environmentally acceptable option is leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open cut the entire length of the cable route.*"

Relevant Representation Number	Representation	Applicant Response
		This current approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. The DEMP will need to be approved by the relevant planning authority pursuant to requirement 20 of the draft DCO, and the relevant planning authority would need to consult with both the Environment Agency and Natural England as part of the approval of the DEMP, meaning that there is the mechanism in place to ensure the EA has the opportunity to input to the approach at the time of decommissioning.
RR.063	Topic Substation Drainage Design Document Reference 6.2.1 Volume 3 Appendix 7.2 Flood Risk Assessment and Outline Drainage Strategy Table 4-1 Surface water drainage hierarchy, Appendix 5.9 Outline Design Parameters Issue Reference EAGWCL-011	Consideration of polluted runoff from a fire within the BESS areas has been made within the surface water drainage design. Firstly, the SuDS features serving these areas will have an impermeable lining to impede the infiltration of potential contaminants to the ground and groundwater.

Relevant Representation Number	Representation	Applicant Response
	Issue It is unclear how firefighting water containment and unlined features could both be incorporated into the BESS and substation drainage design – notably commitment C41 in the Commitments register states: Impact Potential for uncontrolled release of firefighting water into Secondary aquifer in the event of a BESS fire if unlined features are adopted. Solution The Applicant should clarify their statement on provision of unlined features. BESS drainage design commitments should also be captured in the Outline Design Parameters.	Should a fire occur, and the fire suppression system is activated, a penstock valve downstream of the attenuation basins will be automatically triggered to isolate potentially contaminated discharges to the surrounding watercourses. Should this occur, contaminated water would be retained within the basins and tankered away. Furthermore, the potential for a fire to occur at the same time as a rainfall event has been considered and the basins have been sized to provide sufficient storage to attenuate the 1 in 10 year event plus 228m^3 of firewater (based on firefighting at 1,900 l/minute for 2 hours), with no discharge. The Flood Risk Assessment and Outline Drainage Strategy [APP-095] sets the above out in further detail.

	Additional Comments Table 4.1 of the report states: "The provision of unlined features (i.e. permeable sub-base and attenuation features) to encourage some natural infiltration has been considered, however potential contamination from fire water runoff will need to be contained which could limit where this is possible. This would be assessed further at detailed design… Furthermore, the proposed BESS facilities and SuDS features will be lined to prevent the potential for contaminated fire water to infiltrate to the ground." Minimal information on proposed BESS drainage design is provided in the Work No. 2 section of the Outline Design Parameters appendix. Both the Eastern and Western BESS compounds are proposed to be established on Secondary aquifers: • Western BESS: Alluvium (Secondary A) and Mercia Mudstone Group (Secondary B) • Eastern BESS: Mercia Mudstone Group (Secondary B) Table 4-2 identifies that detention basins are proposed at each BESS compound and page 46 of the Flood Risk Assessment and Drainage Strategy outlines that these have been sized to provide sufficient storage to attenuate a 1 in 10-year event plus 228m^3 of firewater without need for discharge, and that a penstock valve would be automatically

Relevant Representation Number	Representation	Applicant Response
	triggered to prevent discharge of contaminated firefighting water.	
RR.063	Topic Penstock Valves Document Reference Volume 1 Chapter 5: Section 5.4.38 Issue Reference EAGWCL-012 Issue It is unclear in this section whether this penstock valve would be closed automatically or manually in the event of a BESS fire. Section 7.5.18 later in the report and item C41 of the Commitments Register confirm that these penstock valves will be automatically triggered along with the fire suppression system in the event of a fire.	Should a fire occur, and the fire suppression system is activated, a penstock valve downstream of the attenuation basins will be automatically triggered to isolate potentially contaminated discharges to the surrounding watercourses. Should this occur, contaminated water would be retained within the basins and tankered away. The Flood Risk Assessment [APP-095] sets the above out in further detail.

Relevant Representation Number	Representation	Applicant Response
	Impact If not automated, there is a risk that firefighting water could be inadvertently discharged to surface water drainage network. The Applicant should ensure that pollution mitigation measures are consistently referenced through the relevant parts of the EIA. Solution The Applicant should state in this section that penstock valves would be closed automatically in the event of a BESS fire.	
RR.063	Topic Firewater Run-off Document Reference 6.2.1 Volume 3 Appendix 7.11 Outline Battery Safety Management Plan	The Applicant acknowledges this concern and will update the Outline Battery Safety Management Plan (oBSMP) [APP-183] to be more considerate of this risk. Consideration of polluted runoff from a fire within the BESS areas has been made within the surface water drainage design. Firstly, the SuDS features serving these areas will have an impermeable lining to impede the infiltration of potential contaminants to the ground and groundwater.

Relevant Representation Number	Representation	Applicant Response
	Issue Reference EAGWCL-013 Issue The report states in Section 4.8.7 "At the time of writing there is no clear consensus on the type or quantity of potentially harmful combustion products. The data from the only BESS fire in the UK indicated that firewater run-off contamination was low" The report does not cite the source of the data, however this conclusion differs from that in a 2024 paper 'Assessment of Run-Off Waters Resulting from Lithium-Ion Battery Fire-Fighting Operations' published in March 2024, which concluded that runoff water from large-scale lithium-ion battery fire incidents could be potentially hazardous to the environment. Impact The statement could potentially be misleading, as there is (non-UK) evidence to suggest that firewater run-off contamination could pose a significant hazard to groundwater.	Should a fire occur, and the fire suppression system is activated, a penstock valve downstream of the attenuation basins will be automatically triggered to isolate potentially contaminated discharges to the surrounding watercourses. Should this occur, contaminated water would be retained within the basins and tankered away. Furthermore, the potential for a fire to occur at the same time as a rainfall event has been considered and the basins have been sized to provide sufficient storage to attenuate the 1 in 10 year event plus 228m^3 of firewater (based on firefighting at 1,900 l/minute for 2 hours), with no discharge. The Flood Risk Assessment [APP-095] sets the above out in further detail.

Relevant Representation Number	Representation	Applicant Response
	Solution The Applicant should confirm the source of information cited in the Management Plan and acknowledge that some studies have indicated Lithium-ion battery firefighting water can contain elevated concentrations of ecotoxic contaminants.	

Relevant Representation Number	Representation	Applicant Response
	Additional Comments Link to research paper: Assessment of Run-Off Waters Resulting from Lithium-Ion Battery Fire-Fighting Operations The paper determined that lithium-ion battery firefighting runoff water was susceptible to containing elevated concentrations of several heavy metals including Ni, Mn, Co, Li and Al, in addition to hydrocarbons and sometimes undecomposed solvents used in the battery electrolyte. A second research paper (Ecotoxicity Evaluation of Fire Extinguishing Water from Large-Scale Battery and Battery Electric Vehicle Fire Tests, Environ. Sci. Technol. 2023, 57, 4821-4830) focusing on a comparison between firefighting water composition from petrol and EV vehicles found higher concentrations of Ni, Co, Li, Mn and fluoride in the lithium-ion vehicle firefighting water.	
RR.063	Outline Battery Safety Management Plan	The Applicant will correct this error.

Relevant Representation Number	Representation	Applicant Response
	The report refers to two documents included in the DCO Application (outline Battery Safety Management Plan and Unplanned Emissions Assessment) however both are referenced as the Outline Battery Safety Management Plan. This should be corrected.	
RR.063	Water Supply Section 2.10 outlines water supply proposals for the operation and maintenance phase of the scheme. This does not reference the water supply for firefighting at BESS compounds (described in Section 4.4 of the Outline Battery Safety Management Plan as comprising four 120,000 litre static tanks at each of the two BESS sites). This should be referenced in the OCEMP.	The Applicant will further reference this item.
Transport & Access		

RR.078	National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is in safeguarding the A1 trunk road located approximately 9km west of the site, and the A46 trunk road, located approximately 7km to the east of the site. In responding to sustainable development consultations, we have regard to DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of local plans and development management proposals. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.	The Applicant notes National Highways response and will engage with National Highways to achieve an agreed position.

Relevant Representation Number	Representation	Applicant Response
RR.078	We have reviewed the May 2024 Preliminary Environmental Information Report (PEIR), Transport Assessment (TA) and Outline Construction Traffic Management Plan (CTMP). At that time we made the following comments: Site Access and Boundary It is noted that the site will not be accessed directly from the SRN and is located far enough from the SRN that there should be no physical impacts to our network. Access to the various site access points/ gates will be via the local road network. Consequently, we have no comments regarding site access or boundary matters.	The Applicant notes the previous commentary from National Highways.

Relevant Representation Number	Representation	Applicant Response
RR.078	Operational Phase – Trip Generation One Earth will require a team of engineers and ground workers to maintain and ensure the solar farm is running optimally including occasional maintenance. It is anticipated that during normal operations there will be no more than 15 to 20 full time staff on site daily. In addition, it is anticipated that there could be up to 10 LGV trips per day to cater for cleaning and general site maintenance. In view of this, we are unlikely to have any concerns relating to traffic impacts on our network once the site is operational.	The Applicant notes the previous commentary from National Highways.

Relevant Representation Number	Representation	Applicant Response
RR.078	Construction Phase – Traffic Impact (staff) The construction phase of the project is considered to have the greatest impact in terms of transport and potential impacts on the SRN. The construction period is estimated to take approximately 2 years, beginning in 2027 and completion in 2029. The Transport Assessment states construction staff will be located in the local area and will access the scheme from the local road network. The maximum daily trip generation is stated to be 220 vehicle trips (two-way trips) per day during the peak of staff requirements. National Highways will require an hourly breakdown of two-way trips on the SRN for construction staff. A proposed staff travel plan is said to help reduce single occupancy car journeys. The travel plan aims to ensure 80% of staff arrive to the site by minibus, 10% by LGV and 10% by car. National Highways will require further information on the predicted number of workers during the construction period, where they are likely to be commuting from, and how the proposed mini-bus service would be operated.	Construction Phase – Traffic Impact (staff) The construction phase of the project is considered to have the greatest impact in terms of transport and potential impacts on the SRN. The construction period is estimated to take approximately 2 years, beginning in 2027 and completion in 2029. The Transport Assessment states construction staff will be located in the local area and will access the scheme from the local road network. The maximum daily trip generation is stated to be 220 vehicle trips (two-way trips) per day during the peak of staff requirements. National Highways will require an hourly breakdown of two-way trips on the SRN for construction staff. A proposed staff travel plan is said to help reduce single occupancy car journeys. The travel plan aims to ensure 80% of staff arrive to the site by minibus, 10% by LGV and 10% by car. National Highways will require further information on the predicted number of workers during the construction period, where they are likely to be commuting from, and how the proposed mini-bus service would be operated.

RR.078	Construction Phase - Traffic Impacts (materials/deliveries) Construction traffic for material delivery is proposed to be split between the west and east development areas. The east development area is proposed to be accessed and materials sources from local quarries via the A1133 corridor. The western area will source materials from local quarries and supplies via the A1(M)/Markham Moor Junction. Electric components, plant and general deliveries are likely to originate along the A1(M) from Lincoln. Whilst the above is clear, to understand which route(s) to the site will be the most utilised we would need to see evidence of how HGVs and non-HGVs are likely to distribute on the SRN (A1/M). The Transport Assessment states that at the peak of construction there will be 554 HGV Journeys (for both east and west development sites). Conversely, the Consultation Booklet states that at the peak of construction there will be 272 HGV movements. National Highways therefore seeks clarification on HGV construction traffic numbers to be routed via the SRN. To identify any potential impacts on SRN junctions, HGV trip generation should be broken down into hourly two-way HGV trips, and in turn, the number of two-way HGV trips through any SRN junction.	The Applicant notes the previous commentary from National Highways.

Relevant Representation Number	Representation	Applicant Response
	Recommended Transport Assessment Methodology In light of the above comments, it is advised that further evidence be presented to demonstrate how construction trip generation has been estimated and distributed on the SRN. Hourly trip generation figures should be presented with further detailed assessment of the network AM and PM peaks to be determined. National Highways would also wish to be consulted on the Construction Worker Travel Plan.	
The Applicant notes the previous commentary from National Highways.	Abnormal Loads It is proposed that abnormal loads, particularly for the west development site will utilise the A1(M). The Outline CTMP states that a detailed Abnormal Indivisible Load assessment is being prepared giving a breakup of the movements of the loads. We welcome this approach and look forward to receiving more information to review.	The Applicant notes the previous commentary from National Highways.

Relevant Representation Number	Representation	Applicant Response
RR.078	Land Ownership National Highways will require details of any land acquisition that relates to National Highways' land. National Highways will need to review information provided on the Planning Inspectorate website / portal in response to the issues raised above to determine if there are impacts on the SRN which require mitigation.	The Applicant notes the previous commentary from National Highways.

Relevant Representation Number	Representation	Applicant Response
RR.097	The masterplan document shows a proposed access point (Gate G) adjacent to the Hall Water Reservoir and this would involve crossing over AWS's pipeline assets. It is proposed to widen the access road and create visibility splays on the track running parallel to the reservoir. Discussions are due to take place between AWS and the Applicant on these matters but will need to confirm, for example, any sensitive plant, open cut locations, access works, diversions any above ground plant and shared access locations. The design of the project should minimise interaction with AWS assets/critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.	The access proposal prepared at the location designated as Gate G is proposed to be widened to accommodate construction vehicle movements and ensure that access and egress movements can be undertaken safely. The Applicant is cognisant of the risk of buried services in this region and will continue to work collaboratively to ensure that any assets (both above and below ground) that are essential for the operation of the Hall Water Reservoir are suitably protected.

Members of the Public

Relevant Representation Number	Representation	Applicant Response
Air Quality		
RR.139, RR.136, RR.121	Concern about increased air pollution and dust due to construction traffic.	The assessment presented in Environmental Statement (ES) Chapter 13 – Air Quality [APP-042] determined that there would be no significant effects as a result of vehicle exhaust emissions during the construction phase. The assessment utilised the most up to date baseline air quality information, assessment tools and a widely accepted assessment approach (as set out in the relevant guidance documents), and the assessment is therefore considered to be sufficiently robust.

Relevant Representation Number	Representation	Applicant Response
		With regards to emissions of dust from construction works, as presented in Environmental Statement (ES) Chapter 13 – Air Quality [APP-042], a construction dust risk assessment was undertaken to identify the level of mitigation required to ensure there are no significant effects from dust and particulate emissions during construction. The mitigation measures, which are set out in ES Volume 2: Appendix 13.5 [APP-137], are included in, and secured by, Table 3.9 of the Outline Construction Environmental Management Plan (oCEMP) [APP-176]. Requirement 13 of the Draft DCO [APP-007] secures that prior to construction, a CEMP must be submitted to and approved by the relevant planning authority.
Alternatives & Site Selection		
RR.084, RR.064, RR.020, RR.109, RR.111, RR.120, RR.122, RR.123, RR.079, RR.143, RR.155, RR.067	General statement of concern and regarding alternatives and site selection.	The Statement of Need [APP-173] explains that the UK has legally binding targets to decarbonise to net zero carbon emissions by 2050.

Relevant Representation Number	Representation	Applicant Response
		Government's National Policy Statements (NPSs) for Energy (EN-1 & EN-3) confirm that large-scale ground mounted solar farms have a critical role to play in achieving the government's aims and establish a critical national priority (CNP) for low-carbon infrastructure, including large-scale solar farms, because of the decarbonisation, energy security, and affordability benefits that they deliver. Whilst the NPSs establish that the Secretary of State is not required to consider the specific contribution of any individual project to satisfying the need established in the NPSs, Statement of Need concludes that the decarbonisation, security of supply, and affordability benefits delivered by the Proposed Development to the national urgent need for low-carbon generation should be accorded substantial weight when assessing the planning balance. Throughout the development process, the Applicant has engaged with local communities and elected officials in order to better understand the concerns about the Proposed Development. Through two periods of consultation and ongoing engagement, this feedback has resulted in significant changes to the Indicative Masterplan, which are described further in the Consultation Report [APP-151] and the Design Approach Document [APP-171].

Relevant Representation Number	Representation	Applicant Response
RR.007, RR.106, RR.069, RR.020, RR.072, RR.151, RR.110, RR.109, RR.086, RR.112, RR.147, RR.015, RR.152, RR.059, RR.132, RR.054, RR.016, RR.026, RR.083, RR.067, RR.013, RR.089, RR.074, RR.150, RR.107, RR.011, RR.052, RR.103, RR.149, RR.094, RR.136, RR.126, RR.023	Concern that the project is too large.	There is an urgent need for renewable energy projects to deliver the Government's legally binding commitment to net zero, which cannot be reached with the delivery of small sites alone – projects are needed to deliver energy at scale, as discussed in the section 8.6 Statement of Need [APP-173], which concludes that the development of large sites (which connect to the transmission network) is essential in order to connect the scale of new capacity required to meet Net Zero requirements. On this basis, the emphasis should be on maximising the use of available capacity at grid connections where they occur. Consideration was therefore given to areas in the UK where grid connections were available and that were suitable for solar development, and then a project of a size sufficient to meet the grid connection agreement was progressed.

Relevant Representation Number	Representation	Applicant Response
		In order to produce enough energy to meet the 740 MW grid connection agreement, significant amounts of land are needed. However, throughout the development process, the Applicant has reduced the total size of the Order Limits in order to reduce impacts. The first indicative masterplan that was included for the non-statutory consultation included 1031 hectares for potential developable area. This was reduced to 992 hectares for the updated masterplan presented at the statutory consultation, and then further reduced to 985 hectares for the final DCO submission. Similarly, the land included for mitigation areas has reduced throughout the development process, from 441 hectares to 356 hectares, and finally 294 hectares for the final DCO submission.

RR.030, RR.027, RR.071, RR.115, RR.146, RR.064, RR.035, RR.141, RR.006, RR.139, RR.055, RR.007, RR.106, RR.069, RR.020, RR.072, RR.125, RR.015, RR.023, RR.070, RR.040, RR.147, RR.116, RR.152, RR.059, RR.008, RR.062, RR.051, RR.153, RR.132, RR.122, RR.054, RR.087, RR.024, RR.057, RR.026, RR.066, RR.083 , RR.117, RR.145, RR.068, RR.034, RR.033, RR.036 RR.098, RR.081, RR.155, RR.019, RR.073, RR.114, RR.129, RR.091, RR.080, RR.090,	Concern about loss of high quality agricultural land and impact to food security.	NPS EN-3 acknowledges that solar development is not prohibited on BMV land, and it is recognised that at scale, developments may use some agricultural land. During the site selection process, the use of BMV was considered by the Applicant using the Natural England predictive mapping. This shows large areas of the Order Limits as having a low-to-moderate likelihood probability of BMV. Similarly, the provisional DEFRA mapping showed that the majority of the land within the Order Limits was Grade 3, with pockets of Grade 2 and 4. The site selection process resulted in the Order Limits being selected as a suitable site. The Applicant has since taken steps to avoid and minimise use of BMV land, however, there does still remain BMV land within the Site. The Applicant has set out its justification for this in the application documents. It is explained within Environmental Statement Volume 2, Chapter 4: Alternatives and Design Evolution [ref. APP-033] that other potential Order Limit locations were not of significantly better BMV profile in comparison to the Order Limits, resulting from detailed ALC survey. As the Order Limits have evolved, some land parcels of ALC Grade 2 have been removed in seeking to avoid and minimise impacts to BMV land.

Relevant Representation Number	Representation	Applicant Response
RR.121, RR.124, RR.021, RR.039, RR.025, RR.013, RR.113, RR.108, RR.089, RR.148, RR.010, RR.105, RR.005, RR.128, RR.061, RR.126, RR.014, RR.065, RR.020, RR.130		With complete avoidance of BMV land not possible in a way that still achieves the objectives of the Proposed Development, a key focus in the design of the Proposed Development was on minimising impacts on BMV as much as possible. To meet our national targets for solar energy would only require 0.3% of the total land in the UK, creating a minimal impact on food production.

Relevant Representation Number	Representation	Applicant Response
RR.027, RR.115, RR.146, RR.064, RR.139, RR.055, RR.106, RR.069, RR.020, RR.008, RR.051, RR.122, RR.054, RR.026, RR.137, RR.117, RR.145, RR.068, RR.041, RR.036, RR.098, RR.013, RR.089, RR.031, RR.107	Support for solar development in other locations, including rooftops and brownfields.	It is agreed that more rooftops should be used to help deliver more low carbon electricity within the UK. However, on its own it cannot deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets. Therefore, smaller scale solar, including rooftop solar, must be considered as an additional to, as opposed to instead of, the need for large-scale, ground-mounted solar like this Proposed Development. With regards to brownfield sites, this was assessed as part of the site selection process, but only 3 sites were identified on the brownfield land register within the search area. Two of these have permission for residential development and are not available. The other is 0.4ha which is much too small for the Proposed Development. The Applicant also considered the land around High Marnham substation at an early stage. This was not available as the landowner had their own development proposals for the land, with associated Town and Country Planning applications and so the land was not available for development at the time of site selection.

Relevant Representation Number	Representation	Applicant Response
RR.064, RR.138, RR.111, RR.015, RR.059, RR.087, RR.073, RR.129, RR.080, RR.124, RR.021, RR.025, RR.148, RR.150	Support for other forms of renewable energy including wind, tidal, hydrogen or nuclear.	The Statement of Need [APP-173] explains in Section 3.9 that Government's Clean Power target is to enable an electricity system in which, annually, clean sources produce at least as much power as Great Britain consumes. Government's view is that this is likely to involve the development of many forms of electricity generation including those mentioned in these RRs. Section 4.3 of the Statement of Need describes Government's view that solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector. It is not considered that the Order limits would be suitable for other forms of renewable generation at the same scale of the Proposed Development within the Order limits. Specifically, tidal power, offshore wind, and hydroelectric storage were not considered possible due to the location of High Marnham Substation approximately 70km from the coast, and within an area of low, flat topography.

Relevant Representation Number	Representation	Applicant Response
		The Order limits is not considered suitable for onshore wind due to the low wind yield relative to other parts of the UK, coupled with the proximity to residential dwellings which would be subject to risks associated with shadow flicker and wind turbine noise. It is not expected that the Order limits would have been able to host an economically viable and successful onshore wind farm without causing greater environmental consequences than the Proposed Development. To produce the same predicted electricity output as the Proposed Development, an onshore wind farm would require approximately 150km2 of land, compared to the required approximate 25km2 for solar farms of similar output. Aside from the need to overcome potential regulatory hurdles, the development of a nuclear power station at the Order limits was not considered to be achievable within the same timeframes as the Proposed Development is likely to deliver.

Relevant Representation Number	Representation	Applicant Response
		It is therefore considered that the Applicant has considered reasonable alternatives, and it maintains that Solar PV development is an appropriate renewable generating solution for the Order Limits, to meet the urgent need for renewable energy generation connecting into the proposed High Marnham substation.
RR.029, RR.098, RR.142, RR.153	Statements that solar technology is obsolete or inefficient.	The Statement of Need [APP-173] explains in Section 3.9 that Government's Clean Power target is to enable an electricity system in which, annually, clean sources produce at least as much power as Great Britain consumes. Government's view is that this is likely to involve the development of many forms of electricity generation including those mentioned in these RRs. Section 4.3 of the Statement of Need describes Government's view that solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector.

Relevant Representation Number	Representation	Applicant Response
		Section 7.8 of the Statement of Need [APP-173] provides evidence on the efficiency of solar panels and supports the conclusions made in section 7.7 of the Statement of Need [APP-173] that "large-scale ground-mount solar schemes, including those that are developed with a configuration which maximises annual output, are likely to produce a greater quantity of low-carbon electricity per acre than the output from a crop-to-biogas application. When compared to onshore wind, the energy production from land under solar is of a similar order of magnitude while the environmental effects of solar schemes may be significantly lower."

Relevant Representation Number	Representation	Applicant Response
RR.058	Support for solar farms located closer to cities.	National Policy Statement EN3 confirms that avoiding proximity to dwellings should form one of the key site selection principles for solar farms of NSIP scale. The size of available and suitable land parcels closer to cities is generally lower than the size of available and suitable land parcels in more rural areas. The same is true for grid connection capacity (Statement of Need [APP-173], Section 8.2). This means that solar farms located closer to cities are much smaller than more rural solar farms. It is agreed that smaller solar farms, including solar panels on rooftops in towns and cities, can be used to help deliver more low carbon electricity within the UK. However, smaller scale solar, including rooftop solar, must be considered as additional to, as opposed to instead of, the need for large-scale, ground-mounted solar like this Proposed Development.
RR.014	Support for solar on old RAF bases.	The Applicant notes this comment, but there were no suitable old RAF bases in proximity to the grid connection.
RR.146	Statement that recent political elections show that there is not support for large scale renewable energy projects.	There is a clear and sustained political support within the UK Government for large-scale renewable energy projects, and this is demonstrated within the clean power targets to be met by 2030, and net zero targets that are to be met by 2050.

Relevant Representation Number	Representation	Applicant Response
		As summarised within the Statement of Need [APP-173], as a result of its commitments to the Paris Agreement, in June 2019 the UK became the first major economy to legislate for a 2050 net zero GHG emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. UK governmental objectives are to ensure the supply of energy to the national energy system always remains secure, reliable, affordable, and consistent with meeting legally binding Greenhouse Gas emissions including the Government's Nationally Determined Contributions (NDC). With the Climate Change Committee (CCC), a national independent advisory committee, making it clear within the 2024 report that there is urgent action needed to get on track for the UK's 2030 targets.

Relevant Representation Number	Representation	Applicant Response
		This reiterates that the UK Government continues to support the need for renewable energy projects and is committed to meeting the targets set out for Net Zero.. National Policy Statement EN-3 states at Para 2.10.9 that "solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector."
RR.152	Concerns that the project being an NSIP means it will be fast-tracked and not properly reviewed.	Each Nationally Significant Infrastructure Project goes through a robust examination process that is set out by the Planning Inspectorate and relevant Examining Authority who are allocated on behalf of the Secretary of State. The examination process takes up to six months, with a further three months for a recommendation to be drafted for the Secretary of State to review and a final three months before a decision is granted to allow the Secretary of State to review all documentation required.

Relevant Representation Number	Representation	Applicant Response
RR.064, RR.152, RR.018	Concern that the lifespan of the project is 60 years, and statements that this is not temporary.	The Applicant is seeking a 60-year consent, which is consistent with other similarly sized solar projects including consents granted for Cottam, West Burton, Gate Burton and Mallard Pass solar farms, which have all been granted 60-year consents. It's important to be clear that EN-3 para 2.10.65 states that *"An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time periods of operation"* and does not impose or suggest a 40-year limit is required. In recent decisions the Secretary of State has confirmed that the 60-year consent lifespan is 'temporary and reversible for the majority of the land' (paragraph 4.167 of the Gate Burton decision) and it is the case for this Proposed Development as noted in paragraph 3.6.2 of the Planning Statement [ref. APP-168] that at the time of decommissioning the land will be reverted back to its original condition. The applicant has assessed the decommissioning of the Proposed Development demonstrating that the Project is temporary with an end date of 60 years from first operation.

Relevant Representation Number	Representation	Applicant Response
RR.030, RR.115, RR.059, RR.132	Statements that the project lifespan increased from 40 to 60 years.	The Applicant is seeking a 60-year consent, which is consistent with other similarly sized solar projects, such as Cottam, West Burton, Gate Burton and Mallard Pass solar farms, which have all been granted 60-year consents. During the non-statutory consultation in late 2023, the Applicant had not confirmed what length of consent it would be applying for, and as such EN-3 para 2.10.65 was referenced, which states that "*An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time periods of operation"* and we explained that the operational period of the project would likely be around 40-45 years, based on existing technology and land agreements. Since the non-statutory consultation, it was confirmed that a 60-year consent would be sought, which was confirmed in statutory consultation material, in May 2024.
Biodiversity		

RR.030, RR.071, RR.115, RR.146,RR.035, RR.139, RR.095, RR.106, RR.099, RR.151, RR.076, RR.112, RR.147, RR.116 RR.018, RR.029, RR.051, RR.087, RR.016, RR.001, RR.145, RR.068, RR.081, RR.019, RR.136, RR.067, RR.073, RR.090, RR.121, RR.124, RR.039, RR.021, RR.025, RR.013, RR.113, RR.148, RR.010, RR.105, RR.005, RR.128, RR.061, RR.014, RR.075, RR.023, RR.116, RR.057	General concern for local wildlife and the habitats required to sustain it.	The potential impacts of the Proposed Development on local wildlife have been assessed in Chapter 6 Biodiversity [APP-035]. It is commonly acknowledged, following publication of a number of scientific peer reviewed studies, that solar farms are generally beneficial to wildlife. The Proposed Development would provide opportunities to enhance biodiversity in the area considerably over the current baseline situation of intensively managed arable farmland. Following construction and habitat creation, numbers and diversity of a range of species groups (e.g. invertebrates, reptiles, farmland birds, wildflowers etc.) would be expected to increase.

Relevant Representation Number	Representation	Applicant Response
RR.007, RR.029, RR.011, RR.023, RR.030, RR.115, RR.013, RR.121	Concern that the movement and migration of wildlife around the local area will be disrupted.	Environmental measure C9 in Chapter 6 Biodiversity [APP-035] provides for opportunities for most wildlife to move between areas inside and outside of the solar array. Only deer are likely to be prevented from entering and these will be able to navigate the area within the corridors made between individual fenced areas.
RR.099, RR.095	Concern that aquatic ecosystems will be affected.	Environmental measures C2, C4, C7, C12, C14, C15, C16, C21, C22, C23, C26 and C35 in Chapter 6 Biodiversity [APP-035] provide protection for freshwater habitats during construction and overall betterment during the operational phase.
RR.141, RR.011, RR.059	Concern that wildlife currently use this area to escape flooding but will no longer be able to do so due to the project's fencing.	The design of the Proposed Development means that there will be corridors of habitat that will remain unfenced and allow for animals to traverse the area.

Relevant Representation Number	Representation	Applicant Response
RR.023, RR.028, RR.059	The project's claims regarding landscaping and biodiversity net gain are not realistic.	The Proposed Development would provide opportunities to enhance biodiversity in the area considerably over the current baseline situation of intensively managed arable farmland. Following construction and habitat creation, numbers and diversity of a range of species groups (e.g. invertebrates, reptiles, farmland birds, wildflowers etc.) would be expected to increase. The outline Landscape and Ecology Management Plan [APP-179] details how the landscaping would be maintained. The Outline Landscape and Ecology Management Plan [APP-179] has had regard to policy requirements, published landscape character assessment guidance, and fieldwork analysis. The Proposed Development including the landscape mitigation has evolved through an iterative design process and is considered to be realistic and achievable. In any case, a detailed Landscape and Ecology Management Plan and Public Rights of Way Management Plan will be provided for review and approval prior to commencement of the authorised development, as set out in Requirement 8 and Requirement 18 of the Draft DCO [APP-007].

Relevant Representation Number	Representation	Applicant Response
RR.132, RR.051, RR.089, RR.023	Concern regarding the impact on deer populations.	The population of deer will not be affected by the presence of the Proposed Development, although their access to areas of former cropland will be restricted. There will be wide corridors of habitat (many of which will be enhanced) through which deer can navigate the area.
RR.122, RR.023	Concern regarding the impact on birds to breed and migrate.	The potential impacts on breeding birds are assessed in Chapter 6 Biodiversity [APP-035]. The Proposed Development would provide opportunities to enhance biodiversity in the area considerably over the current baseline situation of intensively managed arable farmland. Following construction and habitat creation, numbers and diversity of a range of species groups (e.g. invertebrates, reptiles, farmland birds, wildflowers etc.) would be expected to increase.
RR.021	Concern regarding the impact on the health of insect populations.	The Proposed Development would provide opportunities to enhance biodiversity in the area considerably over the current baseline situation of intensively managed arable farmland. Following construction and habitat creation, numbers and diversity of a range of species groups (e.g. invertebrates, reptiles, farmland birds, wildflowers etc.) would be expected to increase.

Relevant Representation Number	Representation	Applicant Response
Climate Change		
RR.030, RR.146, RR.139, RR.125, RR.086, RR.112, RR.051, RR.153, RR.122, RR.098, RR.073	Concern at the climate impact of sourcing solar panels abroad and transporting them to the UK.	The greenhouse gas assessment set out in ES Volume 1 Chapter 14 – Carbon and Climate Change [APP-043] includes an assumption that solar panels and other technological components will be manufactured in China and shipped to the UK for installation. This represents a conservative assumption in line with EIA Regulations (2017) as the shipping emissions will be higher than from nearer, European-based suppliers. This also accounts for the comparatively higher carbon intensity of China's energy grid compared to many European nations. Nonetheless, these assumptions are not a commitment to procuring solar panels and other components from China, and efforts to ensure carbon emissions are considered in project procurement decisions can be developed within the OCEMP [APP-176] and OEMP [APP-177]. This will include consideration to use of UK-based suppliers and their own supply chains to ensure overall embodied carbon and materials transport emissions are minimised as far as practicable.

Relevant Representation Number	Representation	Applicant Response
RR.089, RR.065, RR.020	Concern regarding the carbon emissions associated with constructing the project.	It is acknowledged that the construction of the project will result in greenhouse gas emissions, and these have been fully accounted for in the greenhouse gas assessment set out in ES Volume 1 Chapter 14 – Carbon and Climate Change [APP-043]. The assessment also demonstrates that the emissions saved by the project, when compared to the use of conventional fossil fuel electricity generation (even with carbon capture technology), vastly outweighs the emissions from construction [APP-043 Paragraph 14.6.16]. In addition, construction of any other power generation project of this scale would have a similar or greater carbon emissions footprint. The overall carbon emissions from the project across its lifecycle are demonstrated to be in line with other forms of solar and renewable generation and much lower than those of conventional fossil fuel power stations [APP-043 Paragraph 14.6.20].
Consultation		
RR.009, RR.110	General support for the project and self-sufficient energy production.	Noted.

Relevant Representation Number	Representation	Applicant Response
RR.030, RR.101, RR.099	Concern that developers have not adequately consulted statutory bodies such as the Environment Agency, Anglian Water or Nottinghamshire / Lincolnshire Fire Service.	As required by the Planning Act 2008, the statutory consultation included the required notices for all prescribed bodies, including the Environment Agency, Anglian Water and the relevant Fire and Rescue Services. Their consultation feedback and the Applicant response to it is included in the Consultation Report Appendix J-1 [APP-161].
RR.112, RR.013, RR.023, RR.101, RR.022, RR.020, RR.125, RR.109, RR.112, RR.018, RR.051, RR.122, RR.016, RR.057, RR.023, RR.140, RR.010, RR.014, RR.030, RR.115, RR.136	Frustration with the developer team due to a perceived lack of engagement with local residents concerning project specifics and/or community benefits. Also, general concern that public's views on the project are not being taken seriously.	The pre-application consultation activities, as detailed in the Consultation Report [APP-151], show that the Applicant has provided well beyond the statutory requirements for consultation to ensure a meaningful community engagement built on respect. This includes two stages of consultation, as well as project updates throughout the development process. Engagement included a series of site visits to properties located particularly close to the project boundary from senior members of the project team to collect feedback, which led to significant changes in the project design, as detailed in the Design Approach Document [APP-171].

Relevant Representation Number	Representation	Applicant Response
		As recommended in guidance and best practice for consultation, the Applicant consulted early in the project's development in order to ensure that feedback was able to be taken into consideration before key decisions had been made. This meant that at each stage of consultation the Applicant would be able to present more details on the siting of specific components due to the iterative nature of the development process. For most components, including the locations of solar panels, substations and BESS units, the siting of each component of the Proposed Development is secured on the Works Plan [APP-023]. Within those areas, parameters would define the more precise locations of where components could be located. For example, the power conversion stations would be located no less than 100m from homes or 50m from public rights of way, unless they have acoustic mitigation. The final locations will be determined in the detail design, which would come after consent is granted.

Relevant Representation Number	Representation	Applicant Response
RR.030, RR.027, RR.071, RR.115, RR.022, RR.125, RR.023, RR.087, RR.108, RR.139	Concern regarding the potential for human rights abuses in the project's supply chain, particularly China's use of forced labour.	The Applicant has committed to work with companies who run their businesses and supply chains free from labour and human rights violations, corruption, and environmental risks. We have established a Responsible Business Partner Programme (RPP), building on our general human rights due diligence approach to collaborate with suppliers and business partners on improving their adherence to our social, environmental and ethical expectations. This is to protect the environment and all groups of workers and stakeholders in our supply chains, including those that are most vulnerable.
RR.151, RR.018, RR.016, RR.105, RR.113, RR.005, RR.128, RR.061	General lack of certainty/clarity surrounding proposed community benefits.	From the first point of the project launch, the Applicant has committed to providing a community benefit fund, which would be developed through consultation with the community and local stakeholders. During the first phase of consultation, the Applicant asked a question about what the community would like to see in the community benefit fund. During the second phase of consultation, the Applicant provided more information about the items that had been requested for further feedback. This fund will continue to be developed in consultation with the community if the project is consented.

Relevant Representation Number	Representation	Applicant Response
		During the pre-application period, the Applicant established a small benefit fund to support local initiatives in advance of the application decision. This fund has already allocated its first round of funding and will continue to provide annual funding for another four years or until the decision is made. The Applicant has also committed to working with local authorities and educational institutions to help ensure opportunities for new jobs created for the construction, operation and decommissioning of the Proposed Development are offered to seek to ensure benefits for local labour, when possible, see the Outline Skills, Supply Chain and Employment Plan [APP-180].

Relevant Representation Number	Representation	Applicant Response
RR.030, RR.115, RR.106, RR.076, RR.059, RR.132, RR.054, RR.012, RR.081, RR.019, RR.136, RR.067, RR.121, RR.021, RR.039, RR.025, RR.013, RR.113, RR.105, RR.005, RR.128, RR.061, RR.023, RR.014, RR.065, RR.049, RR.118	General concern that the proposed community benefit is neither sufficient nor proportional to the size of the project. Request for more funding for local groups, reduced energy bills throughout the lifespan of the project, and further consideration of the development of PRoW associated with the project.	From the first point of the project launch, the Applicant has committed to providing a community benefit fund, which would be developed through consultation with the community and local stakeholders. During the first phase of consultation, the Applicant asked a question about what the community would like to see in the community benefit fund. During the second phase of consultation, the Applicant provided more information about the items that had been requested for further feedback. This fund will continue to be developed in consultation with the community if the project is consented. During the pre-application period, the Applicant established a small benefit fund to support local initiatives in advance of the application decision. This fund has already allocated its first round of funding and will continue to provide annual funding for another four years or until the decision is made. The Applicant has also committed to working with local authorities and educational institutions to help ensure opportunities for new jobs created for the construction, operation and decommissioning of the Proposed Development are offered to seek to ensure benefits for local labour, when possible, see the Outline Skills, Supply Chain and Employment Plan [APP-180].

Relevant Representation Number	Representation	Applicant Response
RR.028	Request for more details on the proposed construction timeline.	The Outline Construction Environmental Management Plan [APP-176] provides high level description of the approach to construction and how impacts will be mitigated. If the project is consented, the final CEMP will have more details on the construction timeline.
RR.152	Concern that the project's existence is causing people to become sceptical of renewable energy as a whole.	The Statement of Need [APP-173] explains that the UK has legally binding targets to decarbonise to net zero carbon emissions by 2050. Government's National Policy Statements (NPSs) for Energy (EN-1 & EN-3) confirm that large-scale ground mounted solar farms have a critical role to play in achieving the government's aims and establish a critical national priority (CNP) for low-carbon infrastructure, including large-scale solar farms, because of the decarbonisation, energy security, and affordability benefits that they deliver.

Relevant Representation Number	Representation	Applicant Response
RR.023, RR.027, RR.071	Concern that the inadequate consultation has caused societal division/tension, and that the landowners are being singled out for their involvement.	In consultation materials, the Applicant explained a goal of the development process was to design the Proposed Development in a way that would be sensitive to the local environment and community. To do this, the approach to consultation went well beyond the requirements of the Planning Act 2008, in order to create opportunities for meaningful consultation. The Applicant appreciates that there are differing opinions within the community, and has made efforts to hear from a variety of voices on the relevant issues. It is certainly not an intention to create divisions within the community.
RR.094	Concern that parents will take their children out of school if the project goes ahead.	As above, the Applicant has made significant effort for a meaningful consultation with the local community to design the project in a way that minimises impacts. Through the community benefit package, the Applicant is seeking to support local priorities, such as local schools.

Relevant Representation Number	Representation	Applicant Response
RR.094, RR.030, RR.115, RR.035, RR.092, RR.139, RR.106, RR.125, RR.076, RR.112, RR.116, RR.059, RR.087, RR.024, RR.137, RR.117, RR.012, RR.155, RR.136, RR.067, RR.091, RR.080, RR.124, RR.079, RR.023, RR.089, RR.148, RR.010, RR.031, RR.096, RR.126, RR.014, RR.065, RR.146, RR.114	Concern around the impacts of the development on house prices and that the project will make it more difficult for local residents to sell their homes in the future.	The pre-application consultation activities, as detailed in the Consultation Report [APP-151], show that the Applicant has provided well beyond the statutory requirements for consultation to ensure a meaningful community engagement. This includes two stages of consultation, as well as project updates throughout the development process. Engagement included a series of site visits to properties located particularly close to the project boundary from senior members of the project team to collect feedback, which led to significant changes in the project design, as detailed in the Design Approach Document [APP-171]. This included removing panels around villages and near homes to reduce potential visual impacts. House prices are affected by numerous factors, and there is no evidence that proximity to a solar farm has a significant impact on a home's value.

Relevant Representation Number	Representation	Applicant Response
RR.089, RR.115, RR.051, RR.122, RR.057, RR.019, RR.114, RR.023, RR.080, RR.140, RR.089, RR.074, RR.030, RR.095, RR.125, RR.028, RR.059, RR.090, RR.124, RR.109, RR.022	Insufficient or unclear information provided by the developer team to the community, either in leaflets and/or other documents or at consultation events. Also, general concern that the teams at events have been unable to answer questions related to masterplan specifics (ex. BESS/inverter locations).	The pre-application consultation activities, as detailed in the Consultation Report [APP-151], show that the Applicant has provided well beyond the statutory requirements for consultation to ensure a meaningful community engagement. This includes two stages of consultation, as well as project updates throughout the development process. Engagement included a series of site visits to properties located particularly close to the project boundary from senior members of the project team to collect feedback, which led to significant changes in the project design, as detailed in the Design Approach Document [APP-171]. As recommended in guidance and best practice for consultation, the Applicant consulted early in the project's development in order to ensure that feedback was able to be taken into consideration before key decisions had been made. This meant that at each stage of consultation the Applicant would be able to present more details on the siting of specific components due to the iterative nature of the development process.

Relevant Representation Number	Representation	Applicant Response
RR.030, RR.115	Concern that properties that should have been included in the door-knock were not.	The door knock occurred at the very earliest stage of the project's public launch, using a desktop analysis of local properties. This was a courtesy to introduce the project to individuals who live closest to the draft Order Limits before the wider community received a launch leaflet. It would not be practical for all homes to receive a door knock, however, the Applicant is aware that one home which was located near the boundary was missed from the list. The Applicant was quickly notified of the presence of this home, and subsequently conducted two site visits to meet with the home owners, as described in the Consultation Report [APP-151]. This resulted in significant changes to the project design, as described in the Design Approach Document [APP-171].
RR.115	OE have been slow in updating their website with information and at one point did not have a valid SSL certificate making it an unsecure site to visit. I would have expected the website to be updated and secure.	The website has been kept up to date throughout the project's development. At each stage of consultation, the website was updated with the consultation materials. The Frequently Asked Questions were updated after the first round of consultation in response to key questions raised. The security certificate was updated just after launch in response to feedback from the community.

Relevant Representation Number	Representation	Applicant Response
	OE started a social media page on Facebook and since its creation it has only had 4 posts made on the 21st June 2024 to update their profile picture and then three more posts on the 3rd July 2024 and nothing since. I would have expected the marketing team for OE to have been updating this site and promoting it so locals can see information and be kept up to date. This is just another example of the lack of engagement from OE.	As described in the Consultation Report and Statement of Community Consultation [APP-151], the Applicant used social media to help advertise the consultation. In order to use Facebook advertisements, a host page is needed. Therefore the Applicant did create a Facebook page to facilitate the advertisements, which directed individuals back to the project website: www.oneearthsolarfarm.co.uk, which has been keep up to date throughout the project's development.

Relevant Representation Number	Representation	Applicant Response
RR.124, RR.010	Concern that the Applicant did not offer to return for a second meeting with local residents in December 2024.	During the statutory consultation, the Applicant met with residents at this location, which occurred as detailed in the Consultation Report [APP-151]. Senior members of the project team listened to feedback from the residents and answered questions, as best as possible, based on the information that was available due to the iterative design process. While the residents requested all panels to be removed in the fields to the north and south of their home, the Applicant considered this to be an excessive request based on the potential visual impact. Therefore, a smaller setback was included in the draft masterplan [APP-018]. After the statutory consultation, the Applicant issued a community newsletter to explain the final plan that would be submitted in the application, but there was not a further round of consultation on the Proposed Development so no further site visits were arranged.
Cumulative Impacts		

Relevant Representation Number	Representation	Applicant Response
RR.080, RR.089, RR.105, RR.005, RR.128, RR.023, RR.059, RR.029, RR.111, RR.109, RR.084, RR.002, RR.151	Concern that the environmental assessment accompanying the project has been insufficient or incomplete.	The Applicant has conducted and completed the Environmental Impact Assessment in line with the scoping opinion adopted by the Planning Inspectorate (the production of which was informed by consultation with key statutory consultees), current regulations, the latest best practice/guidance, latest national and local policy, and with the use of accredited industry professionals.
RR.030, RR.115, RR.006, RR.106, RR.072, RR.076, RR.086, RR.015, RR.028, RR.062, RR.051, RR.132, RR.122, RR.087, RR.016, RR.083, RR.081, RR.073, RR.045, RR.058, RR.014, RR.065, RR.020, RR.046, RR.010	General concern at the concentration of other solar projects in the local area.	The Applicant has considered the numerous other solar farms in the local area, and in ES Chapter 18: Cumulative Effects [[APP-047] Table 18.3 shows there could be cumulative effects for landscape character for the construction and operation with Cumulative Scheme ID 27 (21/01577/FULM) and ID 50 EN020034). A Joint Report on Interrelationships will be submitted as part of the Examination. This will be submitted at Deadline 1.

Relevant Representation Number	Representation	Applicant Response
RR.146, RR.064, RR.112, RR.152, RR.059, RR.018, RR.054, RR.019, RR.021	General concern at the concentration of energy projects of different types in the local area.	The Applicant is aware of the density of energy projects in this area, which is largely due to grid capacity and other factors that make this a good location for solar development, as noted in Chapter 4: Alternatives and Design Evolution Chapter [APP-033]. The cumulative impacts of these other developments have been assessed in ES Chapter 18: Cumulative Effects [APP-047] and all of the various projects that were considered is included in the Other Development Long List [APP-146], which includes not just other solar developments but all energy projects and other proposed developments in the area. A Joint Report on Interrelationships will be submitted as part of the Examination. This will be submitted at Deadline 1.

Relevant Representation Number	Representation	Applicant Response
RR.141, RR.025, RR.113, RR.105, RR.005, RR.128, RR.061	Concern at the cumulative effect of projects in the area on farmland.	The Applicant considers the cumulative loss of Best and Most Versatile (BMV) land in Chapter 18: Cumulative Effects [APP-047], this includes major projects within 10km of the Site and for any other Battery Energy Storage System (BESS) or Solar Farm Scheme (which meets the cumulative criteria) beyond 10km of the Site (see ES Appendix 18.3: Summary of Other Developments included within the Cumulative BMV Assessment [APP-147]). The assessment concluded that if all the 'reasonably foreseeable' schemes within Lincolnshire proceed, the change in land use would be 0.26% (including temporary and permanent schemes). The change in land use in Nottinghamshire (for temporary and permanent schemes) would be 0.14%.
RR.064, RR.152, RR.039	Concern at the cumulative effect of projects in the area on the area's rural character.	The Applicant has assessed all relevant and appropriate other developments cumulatively with the Proposed Development. Only two other developments are likely to have significant cumulative effects, regarding landscape character, with the Proposed Development however this is temporary due to the nature of the Proposed Development.

Relevant Representation Number	Representation	Applicant Response
RR.025, RR.113, RR.105, RR.005, RR.128, RR.061	Concern at the cumulative effect of projects in the area on wildlife.	The Applicant has determined there to be no likely significant cumulative effects between the Proposed Development and Other Developments with regard to Biodiversity. Where Other Developments were within a ZoI for Biodiversity, none were considered likely to create a significant cumulative effect due to mitigation, management plans from both developments, and a lack of an impact pathway.
RR.025, RR.113, RR.105, RR.005, RR.128, RR.061	Concern at the cumulative effect of projects in the area on local infrastructure and community wellbeing.	The Transport Assessment (see ES Volume 3: Technical Appendices Supporting ES Volumes 1 and 2 [APP-6.21]) conducted is inherently cumulative as the data used includes future construction traffic flows from the Proposed Development are against the future baseline with Other

Relevant Representation Number	Representation	Applicant Response
		Developments on the road network. A technical note confirming the approach to cumulative within the transport assessment was circulated on the 22nd July 2025 to the County Council Highways Authorities. In addition, Chapter 18: Cumulative Effects [APP-047], considers the impact on human health (including mental health). As detailed in ES Chapter 18: Cumulative Effects [APP-047] no cumulative likely significant effects on local infrastructure and community wellbeing are predicted.
DCO		

Relevant Representation Number	Representation	Applicant Response
RR.095, RR.007, RR.151, RR.109, RR.086, RR.112, RR.028, RR.008, RR.051, RR.122, RR.073	Concern that the project will not be decommissioned properly	If the project is consented, then at the end of the lifespan of the Proposed Development the land would be decommissioned according to the final Decommissioning Environmental Management Plan. The outline Decommissioning Environmental Management Plan (oDEMP) [APP-178] provides details of the requirements, which would be secured in the DCO Requirements (Schedule 2): Decommissioning and Restoration. With respect to decommissioning, all infrastructure will be removed from the Site, including panels, batteries, inverters and other above-ground infrastructure. Below-ground cables at greater depth than 1m are expected to remain in situ, as this causes fewer impacts than removing them, while still allowing agricultural land use to continue, although the Applicant has made clear in the oDEMP that the approach will be confirmed at the time of decommissioning, based on government policy and best practice.
Health		

Relevant Representation Number	Representation	Applicant Response
RR.125, RR.016, RR.065, RR.071, RR.115, RR.022, RR.064, RR.007, RR.106, RR.072, RR.151, RR.076, RR.086, RR.112, RR.051, RR.132, RR.122, RR.087, RR.057, RR.081, RR.133, RR.114, RR.124, RR.089, RR.148, RR.010, RR.126, RR.014, RR.127, RR.023, RR.020, RR.139	Concerns around the presence of the development and its impact on the character of the countryside/access to PRoW having adverse effects on physical health and/or mental wellbeing.	Adverse mental health effects are likely to be most pronounced at the beginning of the phase and gradually reduce over time as the population becomes more accustomed to the changes, in parallel with the establishment of the biodiversity enhancement measures and planting to screen low-level views. The significant adverse visual effects are expected for the first 15 years of operation. However, these will be limited to the residential receptors and recreational receptors in close proximity to the Order Limits, a minority of the Local Study Area. There would be no significant visual effects on residential receptors by Year 15 of operation given the establishment of mitigation planting. Recreational receptors walking across the Order Limits would experience residual significant adverse effects for a short duration as they move through the Order Limits.

Relevant Representation Number	Representation	Applicant Response
		The Applicant will facilitate continued open dialogue with local communities throughout the entirety of the operation and maintenance phase. A Community Liaison Officer will be appointed to lead discussions with local communities, and act as the primary point of contact should there be any queries or complaints. This can foster meaningful dialogue and improved outcomes for communities. Additionally, the beneficial effects of the Community Fund will continue to support community resilience within the Local Study Area and the Wider Study Area over the long-term.

Relevant Representation Number	Representation	Applicant Response
		During construction and decommissioning, there may be minor adverse (not significant) effect on physical activity due to the potential for disruption to PRoWs. Whilst all PRoWs will remain open during this phase, the construction works may discourage their use due to journey diversion or disruption, or due to adverse changes to amenity. The outline Construction Traffic Management Plan [APP-181] sets out how construction traffic is managed and ensure that residents of the Local Study Area can continue to partake in physical activity using the PRoW network. During the Operational Phase, there will be new permissive paths available for use to travel between settlements to access social infrastructure or community facilities. Due to the low trip rates associated with the operation and maintenance of the Proposed Development, there would be no significant traffic impact to the road connections between settlements.
RR.021, RR.025, RR.115, RR.035, RR.139, RR.133, RR.080, RR.113, RR.089, RR.010	Concerns around uncertainty relating to the project having adverse effects on residents' mental health.	If communities and/or individuals feel as if they have not had full information on exactly how and when they will be impacted until the final ES has been completed, then this is likely to lead to a fear of the unknown, which can cause stress and anxiety.

Relevant Representation Number	Representation	Applicant Response
		Engagement can actively alleviate particular impacts upon mental health, by providing a sense of control, inclusion and participation. Significant community engagement activities have taken place. In terms of statutory consultation, five in-person events, two webinars, 20 home visits and three Parish Council meetings were undertaken in Spring/Summer 2024. The Applicant has also kept the wider community informed of project updates through several newsletters that were posted to the consultation zone. See the Consultation Report for further information [APP-151]. A Community Liaison Officer will be appointed to lead discussions with local communities, and act as the primary point of contact should there be any queries or complaints. This can foster meaningful dialogue and improved outcomes for communities.
RR.115, RR.041, RR.098	Concerns around the presence of electromagnetic fields in the vicinity of the development, which may negatively affect the local population.	During the Construction Phase, there are likely to be feelings of anxiety about the operational scheme and the potential impacts of EMFs on human health.

Relevant Representation Number	Representation	Applicant Response
		During the Operation Phase, there is a possibility of adverse mental health effects resulting from concerns that EMFs could be bad for health. For example, despite no recorded instance in the UK of harm resulting from power lines causing interference with active implanted medical devices , health risks from EMFs have been raised as a concern by members of the community through the statutory and non-statutory stakeholder consultation exercises. In this regard, there could be adverse effects if the safety risks are not fully understood.

Relevant Representation Number	Representation	Applicant Response
		There are no residential properties within the Order Limits. The nearest properties are at least 5m from the Order Limits and it is unlikely that cables will be installed that close to any property due to the need for construction vehicles to manoeuvre both sides of the trench within the working width. Cables would be installed at a minimum of 10 m from the façade of any residential dwelling. Some PRoWs do cross over the proposed Interconnecting and Grid Connection Cable Corridors. The presence of the public either directly above or adjacent to underground cables associated with the Scheme would be transient, with the individuals using the PRoWs exposed to electro-magnetic fields from the cables for only very short periods of time. It is considered that the level of exposure to users of PRoWs would be similar to that associated with general household appliances (and noticeably less than associated with the exposure when using a vacuum cleaner). Therefore, no significant effects to users of PRoW are predicted to occur. The cable route would cease to be operational during the Decommissioning Phase.

Relevant Representation Number	Representation	Applicant Response
		Mental health effects during construction as a result of EMF are most likely to be felt as a result of anxiety towards EMF effects over the operational lifetime of the Scheme. The provision of suitable levels of information regarding EMF during consultation, the DCO application process, and then upon request by any person during the construction period should help to alleviate much of this anxiety.
RR.139	Concerns around the effects of air pollution created by the development on local residents and their health.	Environmental Statement Chapter 13 Air Quality [APP-042] considers the effects of air pollution. This concludes that the air quality effects of emissions from construction traffic are judged to be 'not significant', as pollutant concentrations at all worst-case existing receptors will be well below the relevant objectives and the impacts are all predicted to be negligible.

Relevant Representation Number	Representation	Applicant Response
RR.139, RR.039, RR.115, RR.066, RR.121	Concerns that operational/construction noise and other disruption will affect residents' mental health.	Environmental Statement Chapter 15 Noise and Vibration [APP-044] considers the effects of construction and operational noise for residents. The Proposed Development incorporates embedded environmental measures including the adoption of an outline Construction Environment Management Plan (oCEMP) [APP-176] and an outline Construction Traffic Management Plan (oCTMP) [APP-181] to minimise sources of environmental pollution and potential for disruption during the construction works. These documents include good design and best practice measures to ensure that adverse impacts to air quality, noise and traffic are avoided, reduced or mitigated, which is important for human health. During operation, the substation and BESS equipment in particular have been located at a distance of at least 300 m from residential properties in order to reduce the likelihood of disturbance due to noise from fixed plant. As such, the impact on residential receptors was considered not significant.
RR.030, RR.114	The impact of the development on house valuation is causing heightened stress among residents.	The effect of the scheme on house valuation was not assessed within Environmental Statement Chapter 16 Human Health [APP-045] as it is not classified as a wider determinant of health within IEMA guidance (2022).

Relevant Representation Number	Representation	Applicant Response
Heritage		
RR.030, RR.115, RR.112, RR.029, RR.016, RR.081, RR.019, RR.121, RR.039, RR.113, RR.105, RR.005, RR.128, RR.061, RR.014	Concerns about impacts to buried heritage and archaeology in the area and insufficient trial trenching.	The Applicant considers the combination of the assessments undertaken as part of the DBA, the geophysical survey, and the field evaluation carried out to date a robust, proportionate and appropriate baseline collection to inform the DCO. The likely presence and potential importance of buried archaeological remains within the Order Limits has been ascertained by a comprehensive combination of assessment, which included DBA, Geophysical Survey, Lidar and Aerial Imagery assessment and a Geoarchaeological Deposit Model. A proportionate trial trenching evaluation has been carried to inform Chapter 9: Buried Heritage [APP-038] and the DCO also targeting areas of high archaeological potential identified as part of the wider assessment and in consultation with the Archaeology Advisory Teams to the LPAs and Historic England, and the areas where the potential impact of the Proposed Development is expected to be higher.

Relevant Representation Number	Representation	Applicant Response
		These have revealed some discrete locations where buried remains are present. The Environmental Mitigation discussed in Chapter 9: Buried Heritage [APP-038 and whenever required industry standard archaeological mitigation measures will ensure that the Proposed Development will lead to no significant residual effects on buried heritage assets.
RR.016, RR.057, RR.106, RR.151, RR.074	Concerns about impacts to cultural heritage sites	The effect on the historic built environment is detailed in ES Chapter 10 [APP-039] and associated Appendices. To summarise, whilst there would be some harm to a small number of heritage assets, this has been effectively mitigated through good design, in consultation with the local authorities and Historic England. Any residual harm would need to be balanced against the public benefits of renewable energy (in line with NPS EN-1 and EN-3).

Relevant Representation Number	Representation	Applicant Response
RR.059, RR.057	Concern about impact to views of Lincoln Cathedral	As shown within Viewpoint 2a [Figure 11.13.3B [AS-037], the distant visibility of Lincoln Cathedral would not be affected by the Proposed Development due to its low-lying character. Lincoln Cathedral (Grade I listed) was reviewed during the scoping stage, including in discussions with relevant stakeholders, and it was agreed as part of the PEIR (Table 11-2) to scope out this asset from further assessment. Historic England confirmed agreement to this approach during the first round of hearings for the examination.
RR.065, RR.086	General concern about impact to heritage	The effect on the historic built environment is detailed in ES Chapter 10 [APP-039] and associated Appendices. To summarise, whilst there would be some harm to a small number of heritage assets, this has been effectively mitigated through good design, in consultation with the local authorities and Historic England. Any residual harm would need to be balanced against the public benefits of renewable energy (in line with NPS EN-1 and EN-3).
Hydrology & Hydrogeology		

Relevant Representation Number	Representation	Applicant Response
RR.030, RR.071, RR.115, RR.146, RR.035, RR.100, RR.007, RR.106, RR.112, RR.059, RR.018, RR.062, RR.029, RR.153, RR.132, RR.016, RR.057, RR.081, RR.155, RR.019, RR.090, RR.121, RR.021, RR.039, RR.025, RR.113, RR.089, RR.148, RR.105, RR.005, RR.128, RR.061, RR.044, RR.014, RR.065, RR.038, RR.140	Concerns around the region being a flood plain and the presence of the panels contributing to the issue of flooding (particularly due to issues around drainage).	The potential impact on flood risk to the site and surrounding area as a result of the proposed development has been assessed and appropriate mitigation has been put in place where required. This includes raising of the panels and inverters stations within the to be above the design flood extent wherever feasible. Although there are some localised areas where the panels would be submerged to limited depths, this was agreed with the EA and the impact on flood risk is considered be negligible. Note that further discussions are being held with the EA on this point and updates to reports will be undertaken as necessary. The raising of the panels will be achieved through the use of slender frames meaning that the potential for debris blockages is kept to a minimum, and even if there were to be some minor obstruction, flood water would continue to flow. Furthermore, the panels frames will be designed to withstand debris impact as required. Within the Site's operation and management strategies, details for maintenance actions to be taken at regular intervals and following a flood event will be outlined. This will be confirmed at detailed design however, it is anticipated that this will include the following:

Relevant Representation Number	Representation	Applicant Response
		• Clearance of any debris collected on fences, paths, roads and between panel supports. • Inspection of panel supports and fences to ensure structural integrity. Should any issues be observed, then remediation measures will be implemented. Refer to Section 3.1.5 of the FRA (APP-095) for clarity.

Relevant Representation Number	Representation	Applicant Response
		Research undertaken by Cook L.M. and McCuen R.H (2013, Hydrologic response of Solar Farms. Journal of Hydrologic Engineering 18: pp 536-541), indicates that solar farms are not considered to result in significant increases in runoff when compared to the existing greenfield situation. This is on the basis that runoff from the panels themselves will simply drop directly to the vegetated ground beneath where the natural regime will be maintained. However, measures including inspection and maintenance of vegetation cover are proposed to ensure that the impact remains negligible. In addition, it is proposed that strategic Sustainable Drainage Systems (SuDS) such as filter drains, swales and basins/scrapes are incorporated within the solar array areas to encourage infiltration to the ground and also provide ecological and biodiversity benefits.

Relevant Representation Number	Representation	Applicant Response
		The sub-stations and battery storage areas represent more significant hardstanding where surface water runoff would be generated rather than simply infiltrating to the ground. With this in mind, a more traditional drainage assessment has been undertaken for these areas where runoff is to be restricted to the greenfield runoff rate (Q_{bar}) for all events up to and including the 1 in 100 year plus climate change scenario thereby ensuring there is no increase in flood risk due to surface water runoff. The FRA [APP-095] sets this out in further detail and confirms the Proposed Development would not increase flood risk at the Site or surrounding area.
RR.030, RR.115, RR.146, RR.006, RR.007, RR.081, RR.019, RR.021, RR.025, RR.113, RR.105, RR.005, RR.128, RR.061	Concerns that the decision to raise the height of the panels in order to mitigate flood risk is an inadequate solution to the problem.	The approach to raising panels is common for flood mitigation and has been agreed with the EA in numerous meetings. Appendix A3 of the FRA [APP-095] sets out the full meeting minutes with the EA.

Relevant Representation Number	Representation	Applicant Response
		The raising of the panels will be achieved through the use of slender frames meaning that the potential for debris blockages is kept to a minimum, and even if there were to be some minor obstruction, flood water would continue to flow. Furthermore, the panels frames will be designed to withstand debris impact as required. Within the Site's operation and management strategies, details for maintenance actions to be taken at regular intervals and following a flood event will be outlined. This will be confirmed at detailed design however, it Is anticipated that this will include the following: • Clearance of any debris collected on fences, paths, roads and between panel supports. • Inspection of panel supports and fences to ensure structural integrity. Should any issues be observed, then remediation measures will be implemented. Refer to Section 3.1.5 of the FRA [APP-095] for clarity.

Relevant Representation Number	Representation	Applicant Response
RR.141	Concerns around the presence of security fencing and its effects on increased flooding in the area.	The security fencing will be permeable and allow free flow of potential flood water. Within the Site's operation and management strategies, details for maintenance actions to be taken at regular intervals and following a flood event will be outlined. This will be confirmed at detailed design however, it Is anticipated that this will include the following: • Clearance of any debris collected on fences, paths, roads and between panel supports. • Inspection of fences to ensure structural integrity. Should any issues be observed, then remediation measures will be implemented. Should there be a failure of the fences or their supports, these would be removed immediately once flood waters have receded adequately and would be replaced as soon as possible.

Relevant Representation Number	Representation	Applicant Response
RR.059, RR.057, RR.129, RR.090, RR.101, RR.115, RR.099, RR.095, RR.007, RR.076, RR.081	Concerns that the presence of the development combined with the region's propensity to flood will contaminate the local reservoir/drinking water supply.	Flood risk and drainage has been assessed in line with national and local policy to ensure that there will be no increase in flood risk at the Site or surrounding area and would remain operational and safe during times of flood. Refer to the FRA [APP-095] for clarity. Runoff from the hardstanding areas (sub station and BESS) will be treated appropriately prior to discharge to ordinary watercourses and tanked to prevent infiltration to the ground. Furthermore, the detention basins have been located outside of the fluvial design flood extent (1 in 100 year + 39% climate change) and the low risk pluvial flood extent (1 in 1,000 year probability of occurrence) thereby minimising the potential for contaminants to be mobilised from any flooding on site. Refer to Appendix A7 of the FRA [APP-095] for clarity.

Relevant Representation Number	Representation	Applicant Response
RR.095, RR.099, RR.007	Concerns that increased flooding resulting from the development will introduce microplastics and other toxins to the local environment.	Flood risk and drainage has been assessed in line with national and local policy to ensure that there will be no increase in flood risk at the Site or surrounding area and would remain operational and safe during times of flood. Refer to the FRA [APP-095] for clarity. Runoff from the hardstanding areas (substation and BESS) will be treated appropriately prior to discharge to ordinary watercourses and tanked to prevent infiltration to the ground. Furthermore, the detention basins have been located outside of the fluvial design flood extent (1 in 100 year + 39% climate change) and the low risk pluvial flood extent (1 in 1,000 year probability of occurrence) thereby minimising the potential for contaminants to be mobilised from any flooding on site. Appendix A7 of the FRA [APP-095] sets out the surface water drainage strategy.

Relevant Representation Number	Representation	Applicant Response
RR.013, RR.089, RR.057, RR.140	Concern that the flood risk has not been adequately considered/assessed.	Flood risk and drainage has been assessed in line with national and local policy to ensure that there will be no increase in flood risk at the Site or surrounding area and would remain operational and safe during times of flood. Refer to the FRA [APP-095] for clarity.
RR.038, RR.071, RR.100, RR.018, RR.090, RR.140, RR.044	Concerns around the impact of increased flooding on local properties.	Flood risk and drainage has been assessed in line with national and local policy to ensure that there will be no increase in flood risk at the Site or surrounding area and would remain operational and safe during times of flood. Refer to the FRA [APP-095] for clarity.

Relevant Representation Number	Representation	Applicant Response
RR.100	Concern around the impact of the opening of Environment Agency flood gates and impact on a specific hill and existing stream.	The Applicant has contacted the Environment Agency to request further information on the flood gate referenced, and is awaiting a response. However, given the impact on surface water runoff from the solar array areas is considered negligible and a surface water drainage strategy is to be implemented for the substation and BESS areas, which would restrict runnoff rates to match natural conditions, it is considered that there will be no negative impact on the existing drainage infrastructure as a result of the Proposed Development. The impact in the event that the EA flood gate is closed is therefore not considered to change. With regard to an existing spring within the field in question, ground levels are to be retained as existing within the field in question, meaning that there would be no change in overland flow conditions of the existing spring. On the basis that the field in question is topographically higher than North Clifton, and the low points referred to, it is not considered suitable to provide water management or mitigation measures that would benefit any existing strain on the existing drainage structure.
Land Agreements		

Relevant Representation Number	Representation	Applicant Response
RR.087, RR.012	Concern that the landowners are part of the project just to earn money.	The Applicant has secured voluntary agreements with landowners participating in the Array areas, these specific areas are illustrated as Works No. 1 in the Works Plans [APP-014]. While the specific reasons for each landowner's decision to join the project remain private, the One Earth Solar Project is firmly committed to supporting the surrounding community. This commitment includes the provision of Permissive Paths as part of Works No. 8, which also encompasses landscape and ecological enhancements. Further details on this package can be found in the Outline Landscape and Ecology Management Plan [APP-179], and the specific areas involved are illustrated in the Works Plans [APP-014]. Additional community benefits include; the creation of both full-time and temporary employment opportunities during construction and operation, a Community Benefit Fund to provide financial support for local projects and initiatives and educational outreach programs, including school visits and workshops focused on renewable energy and sustainability.

Relevant Representation Number	Representation	Applicant Response
RR.112, RR.016, RR.023	Concern that the DCO includes Compulsory Purchase Powers.	The Applicant has applied as part of its application for development consent for compulsory acquisition powers. These powers, which are available to promoters of Nationally Significant Infrastructure Projects (NSIPs), are subject to strict statutory tests, including the requirement to demonstrate a compelling case in the public interest, and the powers will only apply to land that is included within the limits of the authorised project. The Statement of Reasons [APP-190] sets out information regarding the Applicant's inclusion and potential use of compulsory acquisition powers. The Applicant is committed to securing all agreements voluntarily which would allow the Applicant to implement the project without the use of compulsory acquisition powers. Details of the current voluntary negotiations can be seen on the Pre-application Land and Rights Negotiations Tracker [APP-011].
Land & Soils		

Relevant Representation Number	Representation	Applicant Response
RR.134, RR.086, RR.003, RR.151, RR.076, RR.095, RR.030, RR.115, RR.141, RR.051, RR.132, RR.122, RR.129, RR.013, RR.089	Concern that the development will result in a reduction of the quality of the land for agricultural purposes, and/or that the site will never again be suitable for use in farming.	Related to the soil quality, based on the proposed and anticipated changes to soil use, overall soil health is expected to improve due to the reduction in intensive agricultural use, providing an opportunity for soil nutrient levels to improve, and less stress on soil physical properties. Soil will be managed throughout the construction, operation and decommissioning phase in accordance with the measures detailed in the oSMP [APP-182]. Therefore, based on the methodology set out in the ES, the Applicant considers that over the operational phase, there would be beneficial effects to the soil quality.
RR.106, RR.112, RR.016	General concern about the impact of the development on the quality of the land & soils.	The potential impacts of the Proposed Development on land and soils are assessed in Chapter 8 - Land and Soils [APP-037]. Related to the soil quality, based on the proposed and anticipated changes to soil use, overall soil health is expected to improve due to the reduction in intensive agricultural use, providing an opportunity for soil nutrient levels to improve, and less stress on soil physical properties. Soil will be managed throughout the construction, operation and decommissioning phase in accordance with the measures detailed in the oSMP [APP-182]. Therefore, based on the methodology set out in the ES, the Applicant considers that over the operational phase, there would be beneficial effects to the soil quality.

Relevant Representation Number	Representation	Applicant Response
RR.071, RR.088, RR.139, RR.125, RR.112, RR.098, RR.022	Concerns about the panels being recycled at the end of their life.	The Applicant has committed to achieve 100% reuse and recycling of solar panels (Appendix 2.3 Materials and Waste Impact Assessment [APP-082] paragraph 1.4.2). The Applicant continues to work with the industry to help improve recycling options to ensure that all valuable materials are fed back into new material production.
Masterplanning, Landscape & Visual Impact and Glint & Glare		

Relevant Representation Number	Representation	Applicant Response
RR.030, RR.071, RR.115, RR.035, RR.064, RR.092, RR.106, RR.151, RR.086, RR.003, RR.112, RR.116, RR.152, RR.023, RR.051, RR.153, RR.122, RR.016, RR.083, RR.137, RR.117, RR.036, RR.012, RR.136, RR.067, RR.073, RR.094, RR.133, RR.121, RR.075, RR.142, RR.020, RR.127, RR.103, RR.081, RR.155, RR.089, RR.053	General concern about visual impact to local area and loss of views of the countryside.	Protecting features that are important to the local community and protecting and enhancing places of value are two of the projects Design Principles, as set out in the Design Approach Document [APP-171]. The iterative design process undertaken throughout the pre-application phase has responded to consultation and environmental surveys to minimise the impact on local villages. Such changes have included, but are not limited to: • Inclusion of a 200m offset east of Ragnall; • Siting the proposed solar panels over the crest of rising landform west of Ragnall; • Embedding a 50m offset from Main Street, south of Ragnall; • Removal of 40 acres of solar panels to retain a visual connection between Fledborough and Fledborough Viaduct; • A 150m offset from 'Access Road to Fledborough'; and • Removal of all proposed solar panels between North Clifton and South Clifton. Further measures to reduce the scale and perception of the project are detailed in the Design Approach Document [APP-171].

Relevant Representation Number	Representation	Applicant Response
		Consultation was undertaken with residents of individual properties, allowing the applicant's design team to see residential views firsthand. These consultation visits directly informed the iterative design process. Examples are provided on page 56 of the Design Approach Document [APP-171]. The visual impact of the Proposed Development is reported in the Landscape and Visual Impact Assessment (LVIA) [AS-017].
RR.055, RR.069, RR.124, RR.079, RR.038	Concern about visual impact from a specific local property	The applicant's design team visited residential properties throughout the non-statutory and statutory consultation periods. These visits allowed the design team to experience residential views first hand and discuss potential design changes with the aim of minimising visual impact from residential dwellings. Several of the changes made in response to these visits are detailed within the Design Approach Document [APP-171].

Relevant Representation Number	Representation	Applicant Response
		Given the consultation and field surveys undertaken, the design has been crafted to respond to the specific characteristics of individual residential views.
RR.076, RR.132, RR.114	Concern about the visual impact due to the height of the panels.	With reference to the Site Layout Plans [APP-016], the proposed solar panels would measure up to 3.8m above ground level. Where practical, the height is reduced to 3.5m. The offsets included across the Order limits, as secured through the Works Plan [APP-014], have been designed to provide a substantial buffer between people and the proposed solar panels to limit the visual impact associated with the height of the solar panels. The planting proposed across the project has been designed to screen the proposed solar panels. The planting and associated management/maintenance is set out within the Outline Landscape and Ecology Management Plan [APP-179] shown spatially on the Works Plans [APP-014] and illustrated on the Illustrative Masterplan [APP-018].

Relevant Representation Number	Representation	Applicant Response
RR.071, RR.115, RR.138, RR.106, RR.112, RR.147, RR.116, RR.153, RR.024, RR.122, RR.016, RR.002, RR.073, RR.133, RR.124, RR.089, RR.010, RR.045	Concerns about impacts to public rights of way and other paths.	The Landscape and Visual Impact Assessment [AS-017] details the impact of the Proposed Development on Public Rights of Way. Minimising such impacts has been a consideration from the outset of the project and has been achieved through securing buffers of at least 15m between a Public Right of Way to the first proposed solar panel. In many instances this distance is exceeded, in places measuring in more than 150m.
RR.086	Concern about impact to footpath in Ragnall known as Far Hill Lane.	The Landscape and Visual Impact Assessment [AS-017] details the impact of the Proposed Development on Public Rights of Way. Minimising such impacts has been a consideration from the outset of the project and has been achieved through securing buffers of at least 15m between a Public Right of Way to the first proposed solar panel. In many instances this distance is exceeded, in places measuring in more than 150m.

Relevant Representation Number	Representation	Applicant Response
		Whilst Far Hill Lane is not a Public Right of Way, land to the southern side of the lane (leading from the east) is not within the Order limits and therefore would not change. An offset and new planting has been incorporated to the north of the land, and to the western part of the southern side, to reduce the visual impact experienced by current, and potential future, users of the route.
RR.133, RR.080	Concern about impacts to bridleways and safety impacts on riders.	The Landscape and Visual Impact Assessment [AS-017] details the impact of the Proposed Development on Public Rights of Way. Minimising such impacts has been a consideration from the outset of the project and has been achieved through securing buffers of at least 15m between a Public Right of Way to the first proposed solar panel. In many instances this distance is exceeded, in places measuring in more than 150m.

Relevant Representation Number	Representation	Applicant Response
		The iterative design process has taken account of the British Horse Society (BHS) 'Advice on Solar farms near routes used by equestrians' (April 2024). The guidance recommends "*a minimum usable width of 4m between fences… which usually means fencing at no less than a 5m corridor…This mitigates the enclosed effect of the corridor of the right of way."* In response, the Proposed Development proposes a fence no closer than 10m to Bridleways. Several Bridleways are kept open to one side and others have a greater distance to the closest fence, extending up to 30m. A plan showing these distances is provided in the Design Approach Document (APP-171). The BHS guidance continues to state that "*Use of open mesh fencing is preferable to close boarding or metal palisade-type fencing with sharp points on top…"* With reference to the Outline Design Parameters (APP-172), fencing around the solar panels would comprise "*a deer fence of wooden posts and metal wire mesh".*

Relevant Representation Number	Representation	Applicant Response
		The BHS guidance also states that "*Large developments are opportunities for increasing access… There may be chance to upgrade a footpath to bridleway or to gain an additional route.*" The Proposed Development includes 6.1km of proposed permissive paths, 2.5km of which are located east of the River Trent and connects to existing routes open to equestrians.
RR.059, RR.051, RR.079	Concern about impacts to the Sustrans route.	Protecting features that are important to the local community and protecting and enhancing places of value are two of the projects Design Principles, as set out in the Design Approach Document [APP-171]. The iterative design process undertaken throughout the pre-application phase has responded to consultation and environmental surveys to minimise the impact on local villages. Such changes have included, but are not limited to: • Removal of 40 acres of solar panels to retain a visual connection between Fledborough and Fledborough Viaduct; • Removal of all proposed solar panels between North Clifton and South Clifton. Further measures to reduce the scale and perception of the project are detailed in the Design Approach Document [APP-171].

Relevant Representation Number	Representation	Applicant Response
RR.076, RR.018, RR.013, RR.125	Concern about lack of information around the locations of inverters and batteries.	The location and potential extent of batteries (BESS) is shown on the Works Plans [APP-023]. The BESS has been located at least 300m from all residential properties, as confirmed in the Outline Design Parameters (APP-172). The Outline Design Parameters also confirm that and in all cases the BESS will not result in a nighttime noise level at residential receptors of greater than 35dB(A). The inverters form part of the Power Conversion Stations (PCS) which may be located within Work Area 1, as shown on the Works Plans [APP-023]. Within the coverage of Work Area 1, the location of the PCS is further controlled by the Outline Design Parameters [APP-172] which state that wherever practicable the PCS will be located at least 100m from residential dwellings and in all cases will not result in a night time noise level at residential receptors of greater than 35dB(A).

Relevant Representation Number	Representation	Applicant Response
RR.087, RR.002	Concern about visual impact to North and South Clifton	Protecting features that are important to the local community and protecting and enhancing places of value are two of the projects Design Principles, as set out in the Design Approach Document [APP-171]. The iterative design process undertaken throughout the pre-application phase has responded to consultation and environmental surveys to minimise the impact on local villages. Such changes have included but are not limited to removal of all proposed solar panels between North Clifton and South Clifton. Further measures to reduce the scale and perception of the project are detailed in the Design Approach Document [APP-171].
RR.047, RR.110	Concerns about the locations of the batteries close to homes.	The applicant's design team visited residential properties throughout the non-statutory and statutory consultation periods. Residential properties that were unable to be visited by the design team were considered as part of the wider landscape and visual fieldwork. The residential visits allowed the design team to experience residential views first hand and discuss potential design changes with the aim of minimising visual impact from residential dwellings through offsets and/or landscape screening. Several of the changes made in response to these visits are detailed within the Design Approach Document [APP-171].

Relevant Representation Number	Representation	Applicant Response
		Given the consultation and field surveys undertaken, the design has been crafted to respond to the specific characteristics of individual residential views. The location and potential extent of batteries (BESS) is shown on the Works Plans [APP-023]. The BESS has been located at least 300m from all residential properties, as confirmed in the Outline Design Parameters (APP-172). The Outline Design Parameters also confirm that and in all cases the BESS will not result in a nighttime noise level at residential receptors of greater than 35dB(A).

Relevant Representation Number	Representation	Applicant Response
RR.045	Concern the panels are too close to homes.	The applicant's design team visited residential properties throughout the non-statutory and statutory consultation periods. Residential properties that were unable to be visited by the design team were considered as part of the wider landscape and visual fieldwork. The residential visits allowed the design team to experience residential views first hand and discuss potential design changes with the aim of minimising visual impact from residential dwellings through offsets and/or landscape screening. Several of the changes made in response to these visits are detailed within the Design Approach Document [APP-171]. Given the consultation and field surveys undertaken, the design has been crafted to respond to the specific characteristics of individual residential views.

Relevant Representation Number	Representation	Applicant Response
RR.028	Statement that the landscaping is unrealistic.	The landscape mitigation and enhancement measures set out in the Outline Landscape and Ecology Plan [APP-179] proposes the planting and seeding of species that are characteristic to the local environment and sets out how plants would be established during the first five years following planting. The Outline Landscape and Ecology Plan [APP-179] continues by setting out how the landscape would be managed for the operational duration of the Proposed Development. A detailed Landscape and Ecology Management Plan will be provided for review and approval prior to construction, as set out in Requirement 8 of the Draft DCO [APP-007].
RR.124	Concern about safety risks caused by glare from the solar panels.	A Glint and Glare Assessment [APP-188] was provided as part of the wider DCO submission. Section 5 of the Glint and Glare Assessment details the proposed design that has informed the assessment, including the following characteristics: • Fixed panels (no solar tracking system); • 15 degrees tilt (elevation) angle; • Due South orientation (180 degrees azimuth from North); • Panel material: Smooth glass with Anti-reflective coating, with a slope error of 8.43 mrad; and

Relevant Representation Number	Representation	Applicant Response
		• The design includes solar panels at different heights due to potential flooding. The Glint and Glare Assessment was an iterative process by which emerging findings were shared with the wider project team. Where mitigation was found to be required, this has been embedded in the proposed design in the form of hedgerows to provide screening. Where the Glint and Glare Assessment [APP-188] identified the need for mitigation of impacts relating to road or rail users, the Outline Landscape and Ecology Management Plan [APP-179] secures the provision of opaque screens which would be used until hedgerows are of a sufficient height and depth to mitigate such impacts. The assessment considered adverse glint and glare effects to sensitive receptors nearby in relation with relevant guidance, which takes into account safety risks due to loss of visual performance. The receptors considered include aviation, railways, roads, PRoW, bridleways and waterway users.
Noise		

Relevant Representation Number	Representation	Applicant Response
RR.035, RR.055, RR.106, RR.076, RR.086, RR.112, RR.116, RR.016, RR.148, RR.014	General concern about noise.	The potential for noise impacts is assessed in **Chapter 15: Noise and Vibration [APP-044].** This includes construction traffic noise, on-site construction noise, operational noise and decommissioning noise. No significant effects from noise are identified following the application of mitigation.
RR.027, RR.071, RR.066, RR.136, RR.121, RR.025	Concerns about noise during the construction period due to traffic and disruption.	The potential for noise impacts during the construction period is assessed in **Chapter 15: Noise and Vibration [APP-044].** No significant effects are identified from construction traffic noise following the application of mitigation. The draft DCO ([APP-007, Schedule 2, Requirement 15) also requires that a Construction Traffic Management Plan (CTMP) is submitted to and approved by the relevant Local Authorities prior to commencement of development, which will include measures such as construction traffic routing to limit noise impacts of construction traffic on sensitive receptors. An outline CTMP [**APP-181**] has also been provided as part of the application documents.

Relevant Representation Number	Representation	Applicant Response
RR.067	Concerns about noise during construction due to traffic and disruption, particularly for people who work from home.	The potential for noise impacts during the construction period is assessed in **Chapter 15: Noise and Vibration [APP-044].** No significant effects are identified from construction traffic noise following the application of mitigation. The construction noise assessment is based on criteria from British Standard BS 5228, which accounts for the time of day during which impacts occur, therefore it accounts for the potential effects on people who may be at home during the daytime. The draft DCO ([APP-007, Schedule 2, Requirements 14 and 15) also requires that a Construction Environmental Management Plan (CEMP) and Construction Traffic Management Plan (CTMP) are submitted to and approved by the relevant Local Authorities prior to commencement of development. These management plans will include measures to limit noise, amongst other controls. An outline CEMP [**APP-176**] and an outline CTMP [**APP-181**] have been provided as part of the application documents.

Relevant Representation Number	Representation	Applicant Response
RR.030, RR.027, RR.022, RR.007, RR.015, RR.012, RR.155, RR.019, RR.124	Concerns about noise during the operation period due to inverters.	The potential for noise impacts is assessed in **Chapter 15: Noise and Vibration [APP-142]**. No significant effects are identified from operational noise following the application of mitigation. Note that we assume that the reference to inverters is referring to inverters associated with the solar panels (as opposed to inverters associated with the BESS equipment). For the avoidance of doubt, these inverters are referred to as "Power Converter Stations" (PCSs) in the ES. Details of the assessment of noise from these inverters can be found in the operational noise assessment **[APP-142]**, specifically in Table 3 (noise source data assumptions for PCSs) and Table 6 (predicted daytime and night-time noise levels for PCSs, at all receptors where any operational noise impact greater than "negligible" is predicted). The draft DCO ([**APP-007**], Schedule 2, Requirement 16) sets a limit on operational noise levels at sensitive receptors that will have to be achieved by the final design of the solar farm, including noise from all operational plant and equipment, which will limit any potential noise impacts.

Relevant Representation Number	Representation	Applicant Response
RR.115, RR.141, RR.006, RR.132, RR.121, RR.054, RR.087, RR.098, RR.081, RR.090, RR.021, RR.039, RR.025, RR.113, RR.074, RR.105, RR.005, RR.128, RR.061, RR.126, RR.065, RR.153	Concerns about noise during the operation period due to inverters, BESS and substations.	The potential for noise impacts is assessed in **Chapter 15: Noise and Vibration [APP-142]** and the assessment has considered all elements of the Proposed Development that are mentioned here**.** No significant effects are identified from operational noise following the application of mitigation. The draft DCO ([**APP-007**], Schedule 2, Requirement 16) sets a limit on operational noise levels at sensitive receptors that will have to be achieved by the final design of the solar farm, including noise from all operational plant and equipment, which will limit any potential noise impacts.
RR.059	Concerns about noise from rain falling on the solar panels.	Noise from rain falling on the solar panels has not been assessed in the ES. This is because it is extremely unlikely that noise caused by rain falling on the solar panels will result in audible noise that can be distinguished from rainfall on other hard surfaces (e.g. roofs of buildings, hardstanding, etc.) at noise sensitive receptor locations.
Safety		

Relevant Representation Number	Representation	Applicant Response
RR.014	General concern about safety.	While there is no specific chapter on safety, this is assessed in several places. Environmental Statement Chapter 16: Human Health [APP-045] assesses a range of potential health topics, including EMF. The Glint and Glare assessment [APP-188] assesses potential glint and glare from the solar panels. Noise is assessed in Environmental Statement Chapter 15: Noise and Vibration [APP-044]. Regarding potential safety issues related to the BESS, the Applicant is undergoing engagement with a range of stakeholders, including the EA and Fire and Rescue Services to manage risks and controls for the BESS, which are contained in the Outline Battery Safety Management Plan (oBSMP) [APP-183] primarily. This considers Security, fire and pollution prevention.
RR.101, RR.115, RR.125, RR.051, RR.122, RR.081, RR.155, RR.013	Concerns that if a battery unit caught fire, it would release toxic pollution into the local drinking water supply.	The Applicant acknowledges this concern and will update the oBSMP [APP-183] to be more considerate of this risk. Consideration of polluted runoff from a fire within the BESS areas has been made within the surface water drainage design. Firstly, the SuDS features serving these areas will have an impermeable lining to impede the infiltration of potential contaminants to the ground and groundwater.

Relevant Representation Number	Representation	Applicant Response
		Should a fire occur and the fire suppression system is activated, a penstock valve downstream of the attenuation basins will be automatically triggered to isolate potentially contaminated discharges to the surrounding watercourses. Should this occur, contaminated water would be retained within the basins and tankered away. This manages the risk of contamination by avoiding it potentially entering drinking water. Furthermore, the potential for a fire to occur at the same time as a rainfall event has been considered and the basins have been sized to provide sufficient storage to attenuate the 1 in 10 year event plus 228m^3 of firewater (based on firefighting at 1,900 l/minute for 2 hours), with no discharge. The Flood Risk Assessment [APP-095] sets the above out in further detail.

Relevant Representation Number	Representation	Applicant Response
RR.027, RR.101, RR.022, RR.055, RR.006, RR.106, RR.124, RR.151, RR.086, RR.015, RR.028, RR.029, RR.153, RR.132, RR.087, RR.057, RR.019, RR.129, RR.090, RR.126, RR.035, RR.016	Concerns about the fire risk of BESS units.	The Applicant has applied industry best practice to the design of the BESS (Battery Energy Storage System), including the use of the NFCC (National Fire Chief Council) Guidance "Grid Scale Battery Energy Storage System planning – Guidance for FRS" and NFPA (National Fire Protection Association) 855 "Standard for the Installation of Stationary Energy Storage Systems" and these measures in the process of being agreed with Lincolnshire Fire and Rescue Service and Nottinghamshire Fire and Rescue Service in the Draft Statements of Common Ground. The Applicant has investigated BESS safety and fire risk from a thermal runaway event and adopted suitable mitigation measures detailed within the oBSMP [APP-183]. Engagement will continue to Lincolnshire and Nottinghamshire Fire Rescue Service to develop Emergency Response Plans for The Development. Should a fire occur and the fire suppression system is activated, a penstock valve downstream of the attenuation basins will be automatically triggered to isolate potentially contaminated discharges to the surrounding watercourses. Should this occur, contaminated water would be retained within the basins and tankered away. This manages the risk of contamination by avoiding it potentially entering drinking water.

Relevant Representation Number	Representation	Applicant Response
		Furthermore, the potential for a fire to occur at the same time as a rainfall event has been considered and the basins have been sized to provide sufficient storage to attenuate the 1 in 10 year event plus 228m^3 of firewater (based on firefighting at 1,900 l/minute for 2 hours), with no discharge. The Flood Risk Assessment [APP-095] sets the above out in further detail.
RR.141, RR.098, RR.081, RR.021, RR.025, RR.113, RR.089, RR.105, RR.005, RR.128, RR.061, RR.010, RR.030, RR.141	Concerns that if a BESS caught fire, it would release toxic fumes into the air.	Appendix C of the Outline Battery Safety Management Plan [APP-183] sets out an 'Unplanned Emissions Assessment' of the potential air quality impacts associated with a fire at the BESS. This assessment used dispersion modelling and concluded that it is unlikely that there would be any significant adverse health effects in the event of a fire.

Relevant Representation Number	Representation	Applicant Response
RR.095, RR.030, RR.115, RR.099, RR.022, RR.141, RR.139, RR.007, RR.076, RR.059, RR.051, RR.132, RR.122, RR.081, RR.129, RR.013	Concern that the development will reduce the quality of the soil in the area, as a result of harmful toxins and/or microplastics from the cables degrading over time.	The Solar PV Site will be reinstated in accordance with the Outline Decommissioning Environmental Management Plan (oDEMP) [APP-178]. As detailed in the oDEMP [APP-178], cables left in situ after decommissioning would not impact the future agricultural use of the land, provided they were buried at a minimum 0.9m depth. Cables buried at least 1m below ground are expected to be left in place, and that approach is based on the Applicant's understanding (informed by use of cabling elsewhere and the approach taken on other similar schemes) that these cables would be unlikely to be considered as waste if left in the ground. The approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. However, recognising that industry practice and legislation may change by the time of decommissioning, the Applicant has made clear in the oDEMP that the approach will be confirmed at the time of decommissioning, based on government policy and best practice. Paragraph 1.1.6 of the oDEMP provides:

Relevant Representation Number	Representation	Applicant Response
		"*The mode of cable decommissioning for the grid connection and other underground cables will be dependent upon government policy and best practice at that time. Currently, the most environmentally acceptable option is leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open cut the entire length of the cable route.*" This current approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. The DEMP will need to be approved by the relevant planning authority pursuant to requirement 20 of the draft DCO, and the relevant planning authority would need to consult with both the Environment Agency and Natural England as part of the approval of the DEMP, meaning that there is the mechanism in place to ensure the EA has the opportunity to input to the approach at the time of decommissioning.

Relevant Representation Number	Representation	Applicant Response
		There is no current UK guidance specifically related to the assessment of potential contaminant release from buried cables of the type likely to be used at the Site, or any regulation preventing their use in any environment. Electricity cables of the type likely to be used at the Site are not currently considered to represent a potential source of contamination to soil or groundwater in the land contamination risk management process. It is recognised, however, that best practice guidance and technical knowledge continually evolve, so the oDEMP makes provision for a flexible approach to be adopted at the time of decommissioning, which may involve removal of all cables if this is considered the least impactful approach from an EIA perspective at the time. This approach is considered reasonable given current industry practices, potential uncertainty and allows possible future changes to legislation and/or best practice to be considered at the time of decommissioning.

Relevant Representation Number	Representation	Applicant Response
RR.095	Unknown/Sheer Amount of Cables For example, the development is expected to include 196 solar inverters—each the size of a shipping container—connected by multiple cables to a network of what could be over 3,000 combiner boxes. When this infrastructure is distributed across 4,000 acres, and additional cabling is included to connect substations and battery energy storage systems (BESS), the overall scale of buried cabling becomes a clear and serious environmental concern. Why leave it in the ground? Many in our community believe the over-riding reason for leaving these cables in the ground is both the cost of retrieval, and the cost of recycling. XLPE cables – the type most likely to be used – although offer advantages in their strength are more difficult and expensive to recycle.	The Solar PV Site will be reinstated in accordance with the Outline Decommissioning Environmental Management Plan (oDEMP) [APP-178] As detailed in the oDEMP [APP-178], cables left in situ after decommissioning would not impact the future agricultural use of the land, provided they were buried at a minimum 0.9m depth. Cables buried at least 1m below ground are expected to be left in place, and that approach is based on the Applicant's understanding (informed by use of cabling elsewhere and the approach taken on other similar schemes) that these cables would be unlikely to be considered as waste if left in the ground. The approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. However, recognising that industry practice and legislation may change by the time of decommissioning, the Applicant has made clear in the oDEMP that the approach will be confirmed at the time of decommissioning, based on government policy and best practice. Paragraph 1.1.6 of the oDEMP provides:

Relevant Representation Number	Representation	Applicant Response
	How much plastics etc will be buried? What we do understand is that even the minimum buried cables will be XLPE (Cross-Linked Polyethylene) armoured cable and the amount of plastics per metre will be around 500 grams. It's therefore not difficult to understand, that with hundreds of kilometres, the bare minimum of which is 500gms of plastics per metre, there could be hundreds of tonnes of plastics (plus heavy metals and other compounds) being permanently buried. What could the effects be? XLPE is a thermoset plastic and doesn't melt or dissolve easily, but over decades, it can break down into micro- and nanoplastics. Degradation Mechanisms of Buried XLPE and eventual release of Micro- and Nano-plastics	"*The mode of cable decommissioning for the grid connection and other underground cables will be dependent upon government policy and best practice at that time. Currently, the most environmentally acceptable option is leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open cut the entire length of the cable route.*" This current approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. The DEMP will need to be approved by the relevant planning authority pursuant to requirement 20 of the draft DCO, and the relevant planning authority would need to consult with both the Environment Agency and Natural England as part of the approval of the DEMP, meaning that there is the mechanism in place to ensure the EA has the opportunity to input to the approach at the time of decommissioning.

Relevant Representation Number	Representation	Applicant Response
	a. Thermal Aging Heat exposure, especially from electrical current over long periods, can cause oxidative degradation. This breaks down polymer chains, forming brittle, cracked material and eventually releasing microscopic plastic fragments. b. Water Treeing and Electrical Degradation Over time, moisture ingress into the insulation can form "water trees," which degrade the XLPE and lead to localized breakdown and particle release. As XLPE breaks down through these mechanisms, it sheds tiny fragments of crosslinked polymer— these are microplastics. Because XLPE is not biodegradable, these fragments persist in the environment for decades or longer. Buried cables may fragment underground, and release microplastics into soil and water bodies. In addition to micro-plastic pollution, XLPE cables typically contain several additives, some of which are environmentally hazardous:	As detailed in the oDEMP [APP-178], the removal of the cable will cause a greater negative impact on soil structure, biota and overall soil health by causing unnecessary soil disturbance. Mycorrhiza is a microscopic root like network of mycelium that interconnects roots within the soil. The recent research on mycorrhizal fungi has shown an increase importance of the network to establish a healthy soil through water and nutrient retention. This network is established over time and is easily broken up through soil disturbance. From a soil health and agriculture perspective it is strongly recognised that leaving the cables in situ is the best option to prevent any further potential damage and disturbance. The cables are buried at a minimum depth of 0.9m, the max depth for agricultural activities is 0.6m therefore there will be no risk for agricultural activities.

Relevant Representation Number	Representation	Applicant Response
	a. Antioxidants & Cross-Linking Agents • Residual chemicals (e.g. peroxides, dicumyl peroxide) from the cross-linking process may leach. • Breakdown products can include ketones, alcohols, or aldehydes. b. Flame Retardants & Plasticizers • Some XLPE cables (especially industrial-use ones) include; Brominated flame retardants (BFRs), Phthalates or other plasticizers (in multi-layer cables) These can leach into soil and groundwater, causing toxic and persistent contamination. c. Heavy Metals • Aluminum or copper corrosion products from internal conductors may also leach under certain conditions.	The effects on soil related to microplastics which are referenced within this RR.095 are mainly to do with concerns with microplastic within the topsoil. As the cable will be buried below 0.9m the effects on soil will be significantly less than if it was within the topsoil. Majority of the soil biota are densely populated within the top 30cm of the soil and there is reduced biota population below 60cm a below this depth is limited nutrient and water capacity. Effects on porosity, nutrient cycling and fertility, gas exchange, crop yield and biota will not be relevant due to the cable depth. Additionally due to the depth of the cable reduced cation exchange capacity is not a major impact as again the risk of microplastic on cation exchange capacity are mainly exhibited within the topsoil of the profile. Furthermore, the cable diameter is approximately 150mm plus ducts, which is a diameter in which roots are able to native around. There is no current UK guidance specifically related to the assessment of potential contaminant release from buried cables of the type likely to be used at the Site, or any regulation preventing their use in any environment. Electricity cables of the type likely to be used at the Site are not currently considered to represent a potential source of contamination to soil or groundwater in the land contamination risk management process.

Relevant Representation Number	Representation	Applicant Response
	Soil and Groundwater Contamination Mechanism: As additives and degradation products leach from XLPE jackets and insulation layers, they may accumulate in soil or migrate into groundwater—especially in: • Sandy or porous soils • Areas with high rainfall or shallow water tables Potential contaminants include: • Organic pollutants from additives • Heavy metals (from sheathing, conductors, or stabilizers) • Degradation products of the XLPE polymer Impact of Microplastics in Soil on Ecosystems and Agriculture Microplastics, defined as plastic particles less than 5 mm in size, have become a growing concern in terrestrial environments. While much attention has been given to marine pollution, recent studies reveal that soil ecosystems may contain even higher concentrations of microplastics, particularly in agricultural and industrial areas. These contaminants originate from several sources, including buried infrastructure (e.g., polyethylene and XLPE cables).	It is recognised, however, that best practice guidance and technical knowledge continually evolve, so the oDEMP makes provision for a flexible approach to be adopted at the time of decommissioning, which may involve removal of all cables if this is considered the least impactful approach from an EIA perspective at the time. This approach is considered reasonable given current industry practices, potential uncertainty and allows possible future changes to legislation and/or best practice to be considered at the time of decommissioning.

Relevant Representation Number	Representation	Applicant Response
	Effects on Soil Structure and Function Microplastics can alter the physical properties of soil, including: • Reduced porosity and water retention due to particle intrusion • Impaired soil aggregation, which affects aeration and root penetration • Changes in bulk density, which may influence crop growth and soil workability These structural changes can disrupt essential soil processes such as nutrient cycling, gas exchange, and microbial activity, potentially lowering soil fertility over time. Impact on Soil Biota Microplastics can be ingested by soil-dwelling organisms such as earthworms, nematodes, and insects, leading to: • Physical blockages or damage to digestive systems • Reduced reproduction rates and altered behavior • Bioaccumulation of toxic additives or sorbed pollutants, including phthalates, heavy metals, and persistent organic pollutants (POPs) Such disruptions to soil food webs can weaken the ecological resilience of soils and reduce their capacity to support healthy plant life.	

Relevant Representation Number	Representation	Applicant Response
	Agricultural Implications In agricultural systems, the presence of microplastics can: • Hinder root development and reduce crop yield • Facilitate the transfer of plastic particles into plant tissues, raising potential food safety concerns • Reduce microbial diversity and affect symbiotic relationships such as mycorrhizal fungi, which are vital for nutrient uptake Furthermore, microplastics may alter the soil's chemical environment, impacting the effectiveness of fertilizers and pesticides, and introducing long-term contamination that is difficult to remediate.	

Relevant Representation Number	Representation	Applicant Response
	Ecosystem-Wide Consequences At the ecosystem level, microplastics in soil contribute to: • Loss of biodiversity through habitat degradation and species stress • Disruption of ecosystem services, such as water filtration, carbon storage, and plant productivity • Potential trophic transfer of plastic particles and associated toxins through food chains Over time, this pollution could compromise the ecological integrity and productivity of natural and managed landscapes alike. What about conditions (Sandy and Flood Prone) in the One Earth Solar development zone? Sandy soils and flood-prone land significantly increase both the likelihood and impact of microplastic and chemical pollution resulting from degrading XLPE (cross-linked polyethylene) cables.	

Relevant Representation Number	Representation	Applicant Response
	Here's how each factor contributes: 1. Sandy Soil: High Permeability, Low Retention Sandy soils are characterized by large particles, loose structure, and high drainage capacity. This affects microplastic pollution in several ways: Increased Mobility of Pollutants • Microplastics and leached additives (e.g. peroxides, antioxidants, or residual flame retardants) from XLPE cables can migrate more easily through sandy soils. • Vertical transport is faster, increasing the risk of groundwater contamination. Limited Filtration or Adsorption • Unlike clay or organic-rich soils, sandy soils have low cation exchange capacity and minimal organic matter. • This reduces the soil's ability to trap microplastics or adsorb chemical contaminants, meaning they spread further and faster. Soil Biota Exposure • Soil organisms (e.g. earthworms, springtails) are more likely to encounter or ingest microplastics, as the particles are not well-retained or shielded.	

Relevant Representation Number	Representation	Applicant Response
	2. Flood-Prone Land: Increased Distribution and Surface Spread Flood-prone areas further amplify the pollution potential due to hydrological dynamics: Surface and Subsurface Transport During floods, microplastics and leachates can be mobilized across wide areas, entering: • Nearby farmland • Waterways (rivers, drainage systems) • Aquifers via infiltration Repeated Disturbance Flooding disturbs the soil frequently, which: • Breaks up soil aggregates and exposes buried cable surfaces • Accelerates physical wear and degradation of XLPE • Spreads contaminants during each flood event, turning pollution into a chronic, recurrent issue Increased Contact with Biota and Crops • Floodwaters bring microplastics and chemical residues into contact with plant roots and surface vegetation. • In agricultural zones, this raises concerns about uptake into food crops and contamination of irrigation sources.	

Relevant Representation Number	Representation	Applicant Response
	Types of Crops Most Effected by Micro-plastic Pollution Root and Tuber Crops The very crops currently being grown in the development zone and very popular and successful in this area. Examples: Carrots, potatoes, radishes, beets, parsnips Why they're vulnerable: • Direct soil contact means greater exposure to microplastics and leachates. • Microplastics can alter root morphology, reduce root length, and disrupt nutrient uptake. • There's evidence of micro-plastic uptake into edible parts in some root crops. Key Effects on Crops: • Stunted growth and lower yields • Altered root development • Reduced nutrient uptake • Oxidative stress and cell damage • Potential plastic or additive accumulation in edible tissues (especially with nanoplastics)	

Drinking Water Protected Area (ID: UKGB104028058480) A substantial area of the One Earth Solar Farm development zone is a drinking water protected area. What is a Drinking Water Protected Area? Drinking Water Protected Areas (DrWPAs) are designated zones aimed at safeguarding sources of water used for public drinking supplies. These areas are identified under the EU Water Framework Directive, which has been retained in UK law following Brexit. Their primary purpose is to ensure that raw water remains of high enough quality to allow safe and cost-effective treatment before human consumption. Designation and Management DrWPAs are identified by the respective environmental agencies: the Environment Agency in England, Natural Resources Wales in Wales, the Scottish Environment Protection Agency (SEPA) in Scotland, and the Northern Ireland Environment Agency. They typically include surface waters (like rivers and lakes) and groundwater aquifers where water is abstracted for drinking purposes. Drinking Water Protected Area (DrWPAs) Protections in Place DrWPAs are offered the protection of several legislative and strategy frameworks including; • The Water Framework Directive (WFD) (2000/60/EC) • The Water Environment (Water

Relevant Representation Number	Representation	Applicant Response
	Framework Directive) (England and Wales) Regulations 2017 • The Drinking Water Directive (98/83/EC) and its UK transpositions: • The Groundwater Protection Policy	

No Environmental Agency Specialists Available? Many in our community are also seriously concerned about the failure of the Environment Agency to send a single specialist to a planned meeting with the developers 'One Earth Solar Farm' in Sept of 2024 to discuss water quality matters and WFD requirements. It appears it wasn't until late January 2025 the EA sent an email response simply predominantly making reference to the "Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive" guidance. Correspondingly, many in our communities and the action group are concerned - if this is accurate - about the level of and completeness of liaison with the developers so far, particularly involving the EA and discussions around the WFD (Water Framework Directives). In light of this, we are requesting immediate clarification on the following points: 1. Has a comprehensive environmental risk assessment been conducted to evaluate the longterm impact of micro-plastic leaching, soil degradation, and toxic contamination within the designated drinking water protected area? 2. Is an Environmental Impact Assessment (EIA) required or being carried out, specifically addressing micro-plastic risks to groundwater, surface water, and sensitive habitats

Relevant Representation Number	Representation	Applicant Response
	surrounding the River Trent, the reservoir and the drinking water treatment plant? 3. How will the Environment Agency address a failure to provide a WFD specialist to liaise with the developers on such important and crucial aspects of such a massive project? 4. Does the Environment Agency plan to review this activity, and if so, under what environmental or regulatory framework?	

No Environmental Agency Specialists Available? Many in our community are also seriously concerned about the failure of the Environment Agency to send a single specialist to a planned meeting with the developers 'One Earth Solar Farm' in Sept of 2024 to discuss water quality matters and WFD requirements. It appears it wasn't until late January 2025 the EA sent an email response simply predominantly making reference to the "Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive" guidance. Correspondingly, many in our communities and the action group are concerned - if this is accurate - about the level of and completeness of liaison with the developers so far, particularly involving the EA and discussions around the WFD (Water Framework Directives). In light of this, we are requesting immediate clarification on the following points: 1. Has a comprehensive environmental risk assessment been conducted to evaluate the longterm impact of micro-plastic leaching, soil degradation, and toxic contamination within the designated drinking water protected area? 2. Is an Environmental Impact Assessment (EIA) required or being carried out, specifically addressing micro-plastic risks to groundwater, surface water, and sensitive habitats

Relevant Representation Number	Representation	Applicant Response
	surrounding the River Trent, the reservoir and the drinking water treatment plant? 3. How will the Environment Agency address a failure to provide a WFD specialist to liaise with the developers on such important and crucial aspects of such a massive project? 4. Does the Environment Agency plan to review this activity, and if so, under what environmental or regulatory framework? 3. Threats to Water Treatment Infrastructure Current drinking water treatment processes are not fully effective at removing microplastics—especially smaller fragments (<1 µm) and nanoplastics. Persistent contamination could: • Increase filtration costs • Lead to long-term accumulation in reservoirs and distribution systems • Require upgrades to water treatment facilities	

Relevant Representation Number	Representation	Applicant Response
	4. Potential Human Health Impacts Chronic exposure to microplastics in drinking water may lead to: • Inflammation and oxidative stress in human tissues (shown in animal models) • Bioaccumulation of endocrine-disrupting compounds leached from plastics • Uncertain but emerging risks to gut health, immunity, and reproductive systems 5. Ecosystem and Regulatory Consequences Microplastics and additives can harm aquatic invertebrates, algae, and microbial communities that are part of the natural filtration cycle in source waters. Pollution in a protected zone may violate UK or EU-level drinking water directives, triggering: • Regulatory penalties • Clean-up requirements • Legal challenges or delays for responsible developers	

Relevant Representation Number	Representation	Applicant Response
	Summary: Why XLPE Microplastic Pollution Matters in Protected Zones Risk Category Impact Groundwater quality Long-term contamination with persistent plastics and leachates Water treatment burden Increased costs, inadequate filtration capabilities Human health Unknown but emerging risks from chronic low-dose exposure Legal/environmental Regulatory violations, damage to trust and ecological balance.	

Conclusion Around the world, governments, scientists, and communities are taking action to combat plastic pollution across land, rivers, and oceans. Efforts include banning single-use plastics, improving waste management systems, promoting biodegradable alternatives, and cleaning up waterways before plastics can reach the sea. The presence of microplastics in soil as well as exacerbating these efforts, also represents a significant emerging threat to terrestrial ecosystems and agriculture. Their persistence, mobility, and potential to interfere with biological and chemical processes underscore the need for urgent policy action to limit sources of contamination. Moreover, micro-plastic pollution from degrading XLPE (cross-linked polyethylene) in a drinking water protected area poses serious long-term environmental and public health risks. While XLPE is chemically stable, its degradation over time can still release persistent micro-plastic fragments and potentially toxic additives into soil and groundwater. In a drinking water protection zone, this can be particularly dangerous. Once in these vital water sources, microplastics are difficult to remove and may carry toxic chemicals or pathogens, posing long-term risks to both human health and the environment.

Relevant Representation Number	Representation	Applicant Response
	Their microscopic size allows them to bypass traditional filtration systems, making their presence in drinking water a serious global issue. Please do not let them do this Many in our communities believe Ørsted will sell at least 50% of the One Earth Solar Farm development – they have already sold multiple solar farms – to fund future growth. The requirement of a substantial decommissioning fund could however litter any sale processes, with the removal of the obligation to fully decommission it though; many believe this fund could be significantly reduced—making the development more financially attractive to potential buyers. This has led many residents to view the decision to leave cables in the ground as primarily a financial decision, made with little regard for long-term commitments to the community, environmental responsibilities, or the potential for future pollution.	
Socioeconomics		

Relevant Representation Number	Representation	Applicant Response
RR.016, RR.112, RR.017	Concern about general social effects on local residents including community cohesion/division and general quality of life.	As discussed in ES Chapter 17 – Socio-Economics [APP-046], the Proposed Development will not result in any severance of areas of land or separation of parts of communities, as all development will take place within existing land parcels. Regarding quality of life, the main potential effects considered relevant are those on amenity which, as discussed above, are assessed in the relevant landscape and visual, noise and air quality chapters.
RR.030, RR.115, RR.012, RR.074, RR.059, RR.019, RR.121, RR.021, RR.039, RR.025, RR.113, RR.105, RR.005, RR.128, RR.061, RR.065	Impacts on tourism and the resulting effects on the local tourism industry (Airbnb, rental cottages, small business catering to tourists, etc.), particularly as a result of changes to the local landscape and rural/unindustrialised character of the area.	As discussed above, it is recognised that any reduction in visitor numbers could have knock-on effects on local businesses, such as accommodation and hospitality providers, however the various mitigation measures set out in the ES alongside the potential temporary demand for these services from construction workers would be expected to mitigate these impacts in the short-term, and the temporary nature of the construction works would likely ensure there are no significant effects in the longer term.

Relevant Representation Number	Representation	Applicant Response
		With regards to changes in amenity/character during operation, also as discussed above, the assessment presented in ES Chapter 17 – Socio-Economics [APP-046] considers the potential significant effects on tourism arising from the construction, operation and decommissioning of the Proposed Development. Potential effects on tourism would be expected to arise primarily because of impacts on amenity; namely, visual, noise and dust/air quality impacts, which are assessed in the respective ES chapters (ES Chapter 11 – Landscape and Visual [APP-040], ES Chapter 15 – Noise and Vibration [APP-044] and ES Chapter 13 – Air Quality [APP-042]). The noise and vibration and air quality assessments both concluded that there would be no significant effects on amenity, and while the landscape and visual assessment did identify some significant effects they would be mitigated by the embedded environmental measures.
RR.044, RR.065	Impacts on local businesses not necessarily related to the tourism industry, for example breeders of racehorses or general comments on impacts to local business.	A survey of all landowners within the Order Limits Boundary (OLB) was carried out as part of the baseline assessment presented in ES Chapter 17 – Socio-Economics [APP-046]; all businesses located within the Boundary were found to be agricultural. Tourism related businesses were the only others identified as potentially being negatively affected in the local area, and these effects are discussed above.

Relevant Representation Number	Representation	Applicant Response
		The Proposed Development represents a sizeable investment and, as set out in the Outline SSCEP [APP-180], the Applicant aims to maximise the local benefits by working with relevant stakeholders throughout the process.
RR.006, RR.112	Concern that the project will lead to a loss of jobs specifically related to the agriculture industry in the region and beyond.	As discussed above, during operation, the Proposed Development is expected to generate 15 direct FTE jobs. A survey of all landowners within the Order Limits Boundary (OLB) determined there are currently around 20 jobs (equating to 7.75 FTE) within the OLB, primarily related to agriculture; thus, the net change would be an increase of 7.25 direct FTE jobs. As above, these are estimated to generate an additional 9.75 FTE indirectly, along supply chains. Note this assumes that existing agricultural employment – which includes a number of temporary or seasonal roles – would not be transferred to other plots owned by the same landowner(s) and/or be retained via changes in how existing land is used. It was not practicable in the survey to obtain detailed information on this in the landowners' survey. Hence, we have assumed none are retained in this way for the purposes of the assessment only.

Relevant Representation Number	Representation	Applicant Response
		Subject to the above., some agricultural employment may be affected but with additional employment opportunities relating to the construction and operation of the Proposed Development; overall net change was found to be positive. (as presented in ES Chapter 17 – Socio-Economics [APP-046]).
RR.030, RR.027, RR.115, RR.013, RR.089	Concern that the project will fail to deliver jobs, and/or that it will in fact lead to a loss of jobs in the community.	As discussed above, the Outline SSCEP [APP-180] acknowledges the importance of collaboration between the Applicant and local communities, to ensure as much of the employment and upskilling opportunities generated by the Project are realised within the local area and districts. Further engagement with stakeholders will inform the development of the final SSCEP.
Transport & Access		

Relevant Representation Number	Representation	Applicant Response
RR.027, RR.136, RR.035, RR.139, RR.106, RR.109, RR.059, RR.112, RR.028, RR.016, RR.067, RR.121, RR.124, RR.079, RR.010, RR.024, RR.121	Concerns about impact of construction traffic on local roads.	The Applicant notes the comments on transport raised by members of the public. No long term or significant traffic impacts are predicted as a result of the Proposed Development. These are detailed in Table 12-10 of Chapter 12: Transport and Access [APP-041]].
RR.121, RR.067, RR.039	Concerns about safety impacts of construction traffic.	The Applicant notes the comments relating to road safety raised by members of the public. Road safety is fully considered in Chapter 12: Transport and Access [APP-041] and is specifically a criteria used in the assessment of impact. The Proposed Development will not result in a detrimental change in road safety. Further details on how construction traffic will be manged is detailed in oCTMP [APP-181], where a range of measures to ensure the safety of all road users are provided.

Relevant Representation Number	Representation	Applicant Response
RR.054	Concern about disruption due to construction.	The Applicant notes the comments on transport raised by members of the public. No long term or significant traffic impacts are predicted as a result of the Proposed Development. These are detailed in Table 12-10 of Chapter 12: Transport and Access [APP-041].

One Earth Solar Farm

Cultural Heritage Additional Information

RESPONSE TO RELEVANT REPRESENTATIONS | JULY 2025

On behalf of One Earth Solar Farm

1 | Cultural Heritage Additional Information

Summary of Additional Information

1.1 This document has been prepared to provide additional information for the topic of Cultural Heritage, as requested by Newark and Sherwood District Council in the Relevant Representations.

1.2 It accompanies the written response to Relevant Representations and Chapter 10 of the Environmental Statement [APP-039] and should be read alongside.

1.3 The additional information provided addresses the following requests:

a. Request for photography of the Church of St George the Martyr (Grade II*) from Fledborough Viaduct [*RR-033, 171*]:

- A panoramic view of the Church from Fledborough Viaduct is provided at Figure 1.1, page 2.

b. Query on the impact of the Proposed Development on the setting of the Church of St George the Martyr in views from Fledborough Viaduct [*RR-033, 171*]:

- A diagram of approximate viewcone in the above panoramic view relative to the Proposed Development is provided at Figure 1.2, page 3.

c. Request for photography of Hall Farmhouse, North Clifton (Grade II) [*RR-033, 176*]:

- Photography is provided at Figures 1.3 - 1.5, pages 4 - 5.

1.4 Alongside the written response, this information should satisfactorily address the comments made by Newark and Sherwood District Council in the Relevant Representations.

1 | Introduction

Photography of Church of St George the Martyr

Figure 1.1 Panoramic View (180 degrees) of Church of St George the Martyr from Fledborough Viaduct

Diagram of panoramic view relative to Proposed Development

Figure 1.2 Diagram of approximate viewcone of panoramic view at Figure 1.1 (previous page), relative to the Proposed Development. Not to Scale

1 | Introduction

Photography of Hall Farmhouse, North Clifton

Figure 1.3 View of Hall Farmhouse, North Clifton, from Church Lane (author, June 2023)

Figure 1.4 View of Church Lane from outside Hall Farmhouse (author, June 2023)

Figure 1.5 View of North Clifton from Church Lane (south of Hall Farmhouse) (Google street view, April 2025)

Delivery | Design | Engagement | Heritage | Impact Management | Planning
Sustainable Development | Townscape | Transport

Edinburgh : 11 Alva Street | Edinburgh | EH2 4PH
Glasgow : 177 West George Street | Glasgow | G2 2LB
London : Da Vinci House | 44 Saffron Hill | London | EC1N 8FH
Manchester : This is The Space | 68 Quay Street | Manchester | M3 3EJ
Birmingham : The Colmore Building | 20 Colmore Circus Queensway | Birmingham | B4 6AT

www.iceniprojects.com | iceni-projects | iceniprojects | iceniprojects