One Earth Solar Farm

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Applicant Response to Written Representations

August 2025

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Rule 8(1)(b) Planning Act 2008 Infrastructure Planning (Examination Procedure) Rules 2010

Contents

1. Introduction

1.1 Overview

1.1.1 This report responds to the Written Representations submitted at Deadline 1. It responds to the key topics raised in each Written Representation (WR). A total of 16 WRs were submitted to the Examination at Deadline 1. This includes the Coal Authority [REP1-102] which had no comment, and therefore is not included in the table below. The WRs received and responded to include –

- Lincolnshire County Council [REP1-091]
- South Clifton Parish Council [REP1-097]
- West Lindsey District Council [REP1-099]
- Environment Agency [REP1-103]
- Marine Management Organisation [REP1-105]
- National Highways [REP1-106]
- Exolum [REP1-110]
- National Grid Electricity Transmission Plc [REP1-111]
- Network Rail Infrastructure Limited [REP1-113]
- Andrew Charles Coverdale [REP1-118]
- Craig Walker [REP1-120]
- Heather Fox [REP1-122]
- Jonathan Burnett [REP1-125]
- Rebecca Walker [REP1-127]
- Stephen Fox [REP1-131]

1.1.2 Section 2 summarises the comments made in the WRs and the Applicant's response to them.

2. Applicant Response Table

Internal Ref	WR	Summary	Applicant Response
WR26	Lincolnshire County Council [REP1-091]	A significant negative impact upon the landscape character and visually both individually and cumulatively with other projects which results in the conclusion that the scheme would be contrary to Central Lincolnshire Local Plan policies S5 (Development in the Countryside), S14 (Renewable Energy) and S53 (Design and Amenity). By reason of its mass and scale, the development would lead to significant adverse effects on landscape character and visual amenity at all main phases of the scheme. The development has the potential to transform the local landscape by altering its character on a large scale which has the potential to affect a wider landscape character, at a regional scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity and agricultural character that are identified as defining characteristics of the area. The alteration of views within an agricultural or rural landscape to that of a landscape with large scale solar development would also result in significant adverse effects on views from receptors.	As explained in the Applicant's Responses to Relevant Representations [REP1-075], the Applicant's LVIA [REP1-025] does identify several significant adverse effects upon the existing landscape and visual baseline. The Applicant's 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.*"
WR27	Lincolnshire County Council [REP1-091]	A significant permanent and negative impact as a consequence of the loss of 170.81ha BMV agricultural land across the whole scheme. The proposal also involves the temporary loss of 137.6ha of BMV land in Lincolnshire (660.9ha across the whole scheme) for 60 years, which is a substantial period. This loss is not only at a local level but significant when considered in-combination with the loss of land from other NSIP scale solar developments which are also being promoted and considered across	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.

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		Lincolnshire, contrary to Central Lincolnshire Local Plan policy S67 (Best and Most versatile Agricultural Land). Furthermore, the whole area is currently productive arable farmland, which would be lost for over 60 years. It may be replaced by a lower-intensity grass-based system, resulting in a locally significant loss of arable output, with potential cumulative impacts across the District and County. According to DEFRA figures, the cumulative loss of crop output could reach approximately £50 million, representing a substantial economic impact on agricultural land productivity.	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 and 0.5% of BMV land within Nottinghamshire.). If all the 'reasonably foreseeable' schemes (including the Proposed Development) within Lincolnshire proceed, the change in land use would be 0.70% (including temporary and permanent schemes). The change in land use in Nottinghamshire, including the Proposed Development (for temporary and permanent schemes) would be 0.64%"
WR28	Lincolnshire County Council [REP1-091]	The level of archaeological investigations conducted so far is considered to be inadequate to assess the potential impact on buried heritage assets. There is a real risk of encountering significant, previously unknown remains. It is concluded that the proposed development would likely have a negative construction impact on heritage assets unless further evaluation and mitigation measures are implemented and at this stage is therefore considered to be contrary to CLLP policy S57 (The Historic Environment).	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.

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			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. 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

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			excavation or archaeological monitoring where avoidance is not possible or feasible. 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 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

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			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." • 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

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			historic environment. In their reply, Historic England support an approach that minimizes unnecessary physical interventions to archaeological remains.
WR29	Lincolnshire County Council [REP1-091]	Additional information is needed to demonstrate how waste arising from solar infrastructure would be sustainably managed. Currently there are no facilities to process and recycle solar panels and associated equipment. When combined with the other solar projects in the County that have either had DCOs granted or that may be granted in the near future, would present a significant issue as additional facilities would be required to ensure these products are sustainably disposed. As such it is considered to be contrary to LMWLP policy W1 (Future Requirements for New Waste Facilities).	Details of expected waste arisings, and of their management, from construction will be included in the contractor SWMP. Details of expected waste arisings, and of their management from operation and decommissioning will be included in the OEMP and DEMP, as outlined below. 7.5.1 Outline Operational Environmental Management Plan (Tracked) (Rev 2) [REP1-049] updated at Deadline 1 states in paragraph 2.9.5: *"To ensure the cumulative generation of waste is managed appropriately, the Applicant commits to working collaboratively to:* • *Share data and reporting on waste types and volumes to support regional waste planning and avoid overburdening local waste infrastructure;* • *Engage with the host authorities and waste planning bodies to ensure consistency with regional waste management strategies and capacity constraints; and* • *Review and update waste mitigation measures regularly through continued dialogue with other developers post-consent."*

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			7.6.1 Outline Decommissioning Environmental Management Plan (including restoration) (Tracked) (Rev 2) [REP1-052] updated at Deadline 1 states in paragraph 2.8.7: *"To ensure the cumulative generation of waste is managed appropriately, the Applicant commits to working collaboratively to:* • *Share data and reporting on waste types and volumes to support regional waste planning and avoid overburdening local waste infrastructure;* • *Engage with the host authorities and waste planning bodies to ensure consistency with regional waste management strategies and capacity constraints; and* • *Review and update waste mitigation measures regularly through continued dialogue with other developers post-consent."* The developer is mindful that local facilities for recycling solar waste do not exist at present. Paragraph 1.9.23 of Appendix 2.3 Materials and Waste Impact Assessment [APP-082] states that "recycling routes are generally available for decommissioning materials at present, and it is likely that there will be even greater opportunities for recycling in the future, not least because the market will have expanded to meet demand as solar PV installations increase."

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			As outlined in the East Yorkshire Solar Farm The Examining Authority's Recommendation Report, 17 February 2025 paragraph 3.13.50. “While the capacity of facilities to deal with the decommissioned solar PV panels is still evolving, I see no reason to disagree with the Applicant’s view that the system will respond to demand over time. There is nothing to suggest that the type or number of panels involved in the application scheme would lead to particular difficulties in this regard.” Therefore, the Applicant considers it reasonable to assume that solar panel recycling will have expanded to meet demand as solar PV installation increase.
WR30	Lincolnshire County Council [REP1-091]	A Minerals Safeguarding Assessment has been submitted providing an assessment of the proposed development against the Lincolnshire Minerals and Waste Local Plan (LMWLP) Policies M11 and M12. However contrary to Policy M11 no detailed assessment of the sand and gravel mineral resource however has been provided therefore it has to be assumed that there are viable mineral resources in the underlying land. The potential for mineral sterilisation is therefore significant, albeit temporary in nature. Further sand and gravel resources are likely to be required in Lincolnshire during the life of the OESF. The safeguarded Newton on Trent Oil site and 250m buffer zone is also surrounded by the OESF order limits boundary. Whilst the site is currently inactive, it has an extant planning permission. The Council considers that insufficient information has been provided in the assessment to demonstrate that the proposed OESF would not prejudice or detrimentally impact upon the operation of the safeguarded site in line with Policy M12.	See our detailed response to the Lincolnshire Local Impact Report at LIR responses LIR4-LIR9 in the Local Impact Report Response Document [EN010159/APP/9.18]

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		Minerals are a finite resource, even though the MSA extends beyond the order limits does not preclude the need to meaningfully assess the impact of the proposals on potential sterilisation of resources. In the development of OESF, minerals safeguarding does not appear to have been given any consideration as part of the site selection process.	
WR31	Lincolnshire County Council [REP1-091]	There are concerns about the certainty of Grid Connection which is a crucial aspect of this proposal and the potential risk for negative environmental impacts to occur from the OESF development commencing without the benefits of generation which would be relied upon for the grant of any consent being secured. In the event the Secretary of State be minded to grant consent for the development it is recommended that the DCO should restrict the commencement of the development, through a requirement, until such time that the High Marnham substation has been granted consent and a material start has been made on the development.	This issue was raised and discussed at Issue Specific Hearing 1 and the Applicant was asked to comment on the inclusion of a Grampian style requirement in the DCO. The Applicant strongly disagrees that there is any justification for imposing such a requirement, and its reasoning in this respect is set out in the Applicant's Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-077] at Agenda Item 6(i), in particular at pages 25 – 27.
WR32	Lincolnshire County Council [REP1-091]	There are currently 5 granted DCOs for solar farms and 8 solar farm proposals at various stages of the DCO application process in Lincolnshire. The cumulative impacts of the OESF, combined with the other developments identified could be significant and include landscape and visual effects, landscape character, construction-related traffic and transport movements, the long-term loss of BMV agricultural land and waste. The short list of inter-project cumulative impacts does not include any solar NSIP/DCO schemes in Lincolnshire, especially given the proximity of the solar developments around Gainsborough which includes Tillbridge, Cottam,	A Joint Interrelationship Report [REP1-074] was submitted at Deadline 1 which considers the cumulative effects of the nearest NSIP solar schemes located within 16km of the Proposed Development. This includes Cottam Solar Project, Gate Burton Energy Park, Great North Road Solar and Biodiversity Park, West Burton Solar Project, Fosse Green Energy, Tillbridge Solar, Steeples Renewables Project. The findings confirm there are no inter-project cumulative significant effects on any environmental aspect with the other NSIP solar schemes. This is consistent with the most recent Joint Interrelationship Report, submitted for Tillbridge Solar on 3 April 2025 as part of Deadline 6 for that application.

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		Gate Burton and West Burton, and Steeple Renewables in Nottinghamshire as their impact was scoped out at an earlier stage. The Council is of the view that as a minimum the above DCO/NSIPs should be included on the list as the in combination landscape and visual effects of the OESF alongside other solar developments around Gainsborough and in Nottinghamshire could significantly impact the landscape character at national, county, and regional levels.	The Applicants Joint Interrelationship report also considers the North Humber to High Marnham Overhead Lines and the proposed High Marnham Substation, which lies within the Order Limits. As outlined in the Joint Interrelationship Report and Chapter 18: Cumulative Effects [APP-047] with the North Humber to High Marnham Overhead Lines there is a moderate to major adverse cumulative effect (significant), on the visual amenity of PRoW users south of East Drayton during both construction and operation. The cumulative waste assessment is presented in Section 1.10 of 6.21 Appendix 2.3 Materials and Waste Impact Assessment [APP-082]. To ensure the cumulative generation of waste is managed appropriately, the Applicant has outlined in the outline Construction Environmental Management Plan [REP1-047], the outline Operational Environmental Management Plan (oOEMP) [REP1-49] and the outline Decommissioning Environmental Management Plan (oDEMP) [REP1-051] a commitment to working collaboratively with the host authorities and waste planning bodies.
WR07	South Clifton Parish Council [REP1-097]	Cumulative Impact The scale of solar NSIPs and similar applications in Nottinghamshire and Lincolnshire threatens to alter the nature of these counties. Six NSIPs have already been approved (Cottom, West Burton, Mallard Pass, Gate Burton, Heckington Fen, Little Crow), and more are either proposed or approved at local level (e.g. Welby,Vicarage Drove, Moors, Pilfery, Hatton, and an unnamed site in Nottinghamshire). The likely overlap of construction phases will strain road networks, increasing traffic and	A Joint Interrelationship Report [REP1-074] was submitted at Deadline 1 which considers the cumulative effects of the nearest NSIP solar schemes located within 16km of the Proposed Development. This includes Cottam Solar Project, Gate Burton Energy Park, Great North Road Solar and Biodiversity Park, West Burton Solar Project, Fosse Green Energy, Tillbridge Solar, Steeples Renewables Project. A map showing the Order Limits of the Proposed Development and the other schemes is included in the Joint Interrelationship Report. The findings confirm there are no

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		damaging road surfaces. We support the Examining Authority's suggestion for an OS-style map showing this project's relation to others, including land grades. The visual intrusion from numerous solar farms will redefine the rural landscape. We agree with Mr. Brown (Lincolnshire County Council) who said solar could become a "defining characteristic" of the counties. The sequential visual impact will shift the perception of these areas from agricultural to industrial. We support Action Point 44 identifying routes subject to this cumulative visual fatigue.The visual intrusion from numerous solar farms will redefine the rural landscape. We agree with Mr. Brown (Lincolnshire County Council) who said solar could become a "defining characteristic" of the counties. The sequential visual impact will shift the perception of these areas from agricultural to industrial. We support Action Point 44 identifying routes subject to this cumulative visual fatigue.	inter-project cumulative significant effects on any environmental aspect with the other NSIP solar schemes. This is consistent with the most recent Joint Interrelationship Report, submitted for Tillbridge Solar on 3 April 2025 as part of Deadline 6 for that application. The Applicants Joint Interrelationship report also considers the North Humber to High Marnham Overhead Lines and the proposed High Marnham Substation, which lies within the Order Limits. As outlined in the Joint Interrelationship Report and Chapter 18: Cumulative Effects [APP-047] with the North Humber to High Marnham Overhead Lines there is a moderate to major adverse cumulative effect (significant), on the visual amenity of PRoW users south of East Drayton during both construction and operation. The Applicant is committed to working with other developers to reduce potential cumulative impacts. The Applicant has included a commitment to seek opportunities to work with other scheme, especially should there be any temporal construction overlaps via the outline Construction and Environmental Management Plan (oCEMP) [REP1-048] and the outline Construction Traffic Management Plan [REP-1-055]. The Applicant disputes the point that *'solar would become a defining characteristic of the counties'* as the project has continually sought to embed good design into the Proposed Development and has had regard to the perceptual qualities of the current landscape. With regard to sequential cumulative effects, in line with PINS Advice Note Seventeen, and considering the principle of proportionality and relevance, the cumulative effects assessment adopts a

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			receptor-led approach, focusing on projects with spatial and temporal overlap that may result in significant in-combination effects. The Applicant is of the view that a sequential cumulative assessment is more appropriate for regularly used routes like major roads, railway lines, ferry routes, popular paths, rather than a convoluted journey that would intentionally pass by any solar infrastructure in the area. The Applicant considers there to be no regularly used routes where sequential cumulative impacts with other NSIPs would be a relevant consideration, and further, no such routes have been identified during the pre-application stage.
WR08	South Clifton Parish Council [REP1-097]	Impact on Residents Residents near panel fields or BESS sites face immense disruption. We support the request for detailed assessments per dwelling. Many affected homeowners were dissatisfied with the applicant's consultation, which often failed to follow up on requests for further dialogue. The five-year mitigation establishment period is too long for residents to wait for screening. Upper floor views will not be softened effectively. What further strategies will be used to reduce this impact?	The Applicant has provided further detail at Deadline 1 explaining the assessment and design approach to individual residential properties at Appendix F of the Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-077]. Examples of how the Applicant has mitigated views from residential properties besides from screening include: - Land north of High Street on approach to South Clifton removed from the project in order to maintain setting of eastern gateway into South Clifton. - All land for solar development removed between North Clifton and South Clifton, and larger offsets to land north of The Chase, Moor Farm, Station House and Mill Farm Cottage to protect residential views. Proposed above ground infrastructure within the Order Limits has also been designed to be sympathetic to the surroundings, with muted, natural colours
WR09	South Clifton Parish Council [REP1-097]	Mental Health The application fails to fully address the mental health consequences for those in Zone 1. Dr. Sarah Armstrong, a GP resident, conducted a study of residents on the east	The Applicant has read in detail the mentioned survey and relevant representation made by Dr Sarah Armstrong. Many of the points raised in both concern the adverse mental health impacts arising from uncertainty around the Scheme.

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		side of the River Trent; her findings were sent to the applicant and discussed at meetings. The applicant knows the level of opposition. SCPC asks the applicant to explain why they believe mental health impacts will disappear post-construction.	The approach undertaken by the Applicant has been to maximise community engagement at all stages, enabling local communities to positively influence the design evolution of the Proposed Development and ensure that a number of embedded mitigation measures and enhancement areas have been secured. The assessment section of APP-045 considers the impacts on mental health as part of its assessment on community identity, culture resilience and influence. 16.6.52 notes that some residents living within the Local Study Area will experience stress and anxiety associated with changes to the physical landscape during operation. Adverse mental health effects are likely to be most pronounced at the beginning of the operational 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. Therefore, the magnitude of the effect was assessed as low, and the likely effect as minor adverse (not significant). In contradiction to WR09, the Applicant does not expect that mental health impacts will disappear as acknowledged by the assessment as minor adverse during its operation phase.
WR10	South Clifton Parish Council [REP1-097]	Drinking Water, Flood Risk, and Drainage We refer you to the submission by David White and the 'Say No To One Earth Solar' action group (SNTOES) regarding use of a Drinking Water Protected Area and Flood Zone land. The site is at high flood risk, especially given the sandy soil. We support Action Points 32 and 33. Structures must withstand flooding, and North Clifton residents must be assured that panel fields will not worsen	The applicant has read in detail the relevant representation from David White and the 'Say No to One Earth Solar' action ground and have provided responses relating to the Drinking Water Protected Area and Hall Water Reservoir/Water Treatment Works as part of the deadline 1 submission. For clarity, please refer to the post hearing notes included within Agenda Item 8.1 of the Written Summary of Applicant's Oral Submission at the Issue Specific Hearing 1 [REP1-076] and

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		the situation. The Environment Agency's floodgate operations must be factored into a full hydrological impact analysis. The adjacent Anglian Water Treatment plant and Hall reservoir must be considered. The applicant raised panel heights to mitigate flood risks, which could lead to panels as tall as double-decker buses. We await the plan detailing panel height variations and areas expected to be partially submerged.	response to Relevant Representation RR.050 within the Applicants Responses to Relevant Representations [REP1-075]. The structural design of the panel frames and also voided structures associated within inverters within the design flood extent has been undertaken. This indicates that the frame structures can and will be designed adequately to accommodate the likely velocity of flood flows and debris impact without failure. For clarity, the structural design presented represents the worst case design (in terms of flood depth, velocity and potential debris impact) however, at detailed design, area specific conditions and likelihood of debris impact will be considered so that efficient sizing of structural features can be undertaken. Note that this will also minimise impacts on flood storage volumes. The review also assessed the potential for the water uplift to detach a panel, and determines that this is lower than the standard wind loading case, so is unlikely to be an issue. As a result, panels becoming loose and causing a blockage is not expected to be an issue because of the floodwater. A response relating to the EA flood gate has been provided as part of the responses to the relevant representations. Refer to response to Relevant Representation RR.100 within the Applicants Responses to Relevant Representations [REP1-075]. Figure 3-10 from the Flood Risk Assessment [AS-051] provides a summary of the Freeboard Allowance and Panel Flood Depths for Design Fluvial Events. This has been provided to the ExA in line with Action Point 30 from [EV5-

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			014]. For clarity, this Figure also illustrates the varying panel heights across the development.
WR11	South Clifton Parish Council [REP1-097]	BESS, Cables, and Pollution According to SNTOES, over 1,000km of buried cables will be used, potentially releasing microplastics into soil and water over time. Refer to the SNTOES report, Clean Water or Energy? BESS or inverter fires present major pollution risks. Current plans to let fires “burn out” are unacceptable. Bassetlaw Council noted that the Fire Authority does not recognise this method. SCPC requests a detailed procedure for managing BESS fires and measures to prevent airborne pollutants reaching nearby villages or the reservoir. Prevailing wind assumptions are insufficient—9% of winds come from the east.	It has been agreed with Natural England that leaving cables in the ground (provided suitably deep to allow regular farming activities to take place) is an acceptable position, and that removal presents a larger environmental impact from a soils perspective. The Applicant remains in contact with the EA. The Applicant has reviewed the findings of the SNTOES report and considers no additional mitigation or monitoring is considered to be warranted to address long-term soil and water quality risk in respect of potential micro-plastic contamination, based on consultation with the EA and NE to date. To reconfirm, the Applicant has introduced a mechanism in the oDEMP [APP/7.6.1] that allows the approach to be reassessed at time of decommissioning and follow good practice. Regarding fire management, the Applicant notes that the burn out strategy has been adopted on other schemes by Lincolnshire FRS, and is an accepted method as acknowledged in Applicants Responses to Relevant Representations [REP1-075].. However, the Applicant is committed to engaging with the Environment Agency and Environmental Health and UK Health Security Agency and will add to the appropriate Statement of Common Ground and submit in a subsequent deadline if required. The Applicant believes that Appendix C Unplanned Emissions Assessment of Outline Battery Safety Management Plan [REP1-059] adequately captures the worst-case scenarios of a potential fire.

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WR12	South Clifton Parish Council [REP1-097]	Mitigation Plans We support Action Point 14 regarding mitigation plans. The wording should indicate firm commitments, not optional considerations.	The Applicant has undertaken the exercise in Action Point 14, to review mitigation plans that use terms such as 'may' or 'would consider' to ensure terminology is a clear commitment. The Applicant updated various management plans at Deadline 1 to reflect this.
WR13	South Clifton Parish Council [REP1-097]	Agriculture, Soils, and BMV Land We share the concerns of Lincolnshire County Council and Newark & Sherwood District Council about the loss of over 53% Best and Most Versatile (BMV) land. SCPC supports the recent ministerial letter signed by 30 MPs' and Peers, sent to the Prime Minister calling for prioritisation of rooftop and brownfield developments. We also question the 10km search area. Expanding the range could identify less BMV land and reduce proximity to villages. The choice of High Marnham for grid connection appears driven by cost-efficiency rather than minimal community disruption.	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 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. In terms of the site selection, the Applicant undertook a site search within 10km of the grid connection point for suitable areas of land for NSIP scale solar development ('the search area'), driven by the desire to be as close to the point of connection as possible, 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.

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WR14	South Clifton Parish Council [REP1-097]	Heritage Historic England raised concerns about archaeological potential near the reservoir. Was this area included in the 2km assessment zone? The applicant still has 21 or 29 areas pending full archaeological assessment—this must be prioritised.	As show in Figure 2 of the Archaeological Desk-Based Assessment [APP-110, p. 61], the areas adjacent to the Water Reservoir are included in the DCO boundary and therefore included in the 2km Study Area considered for the Archaeological Desk-Based Assessment [APP-110 to APP-115] and assessed as part of the Buried Heritage Environmental Statement [APP-038]. As such, the areas adjacent to the Water Reservoir have been surveyed via geophysical magnetometry survey, and in consultation with Historic England the area on the south of the Water Reservoir, within which potential archaeological deposits have been detected during the geophysical survey, have been archaeologically evaluated via trial trenching, and the results issued to Historic England and to the Archaeology Advisory Teams to the LPAs on the 24/07/2025.
WR15	South Clifton Parish Council [REP1-097]	Environmental and Ecological Impact The fencing-off of vast areas for panels will disrupt habitats, especially for deer populations. Videos from other solar sites show deer trapped within fences. The current mitigation plan—installing ramps—is inadequate. A meaningful strategy to preserve habitat connectivity is required.	Ramps will be installed during the construction period to avoid animals from becoming trapped in excavations over-night when engineers are not present (see environmental measure C14 in Table 6.6 of Chapter 6 Biodiversity [APP-REP1-023]). There will not be a need for these ramps during operation as there will not be any open excavations.

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			The fences will be porous to the vast majority of wildlife including badger and brown hare (see environmental measure C9 in Table 6.6 of Chapter 6 Biodiversity [APP-REP1-023]). However, deer will not be able to by-pass the fences to enter the solar farm and therefore could only enter should a gate be left accidentally open or there is a breakage in the fence. Should there be an isolated incident it could be managed by tempting deer back out of open gates with food. Deer would be able to cross the landscape within the corridors of enhanced habitat that will be created by the Proposed Development.
WR16	South Clifton Parish Council [REP1-097]	Grid Connection The applicant plans to connect to High Marnham in 2029, exporting and importing up to 740MW. However, the National Grid's application for necessary infrastructure won't be submitted until late 2025. How can the current Environmental Statement remain valid when the grid substations have yet to be approved or built?	The Environmental Statement (ES) has been undertaken based on assumptions as to the realistic worst case, and this is based upon the grid connection date and available information about National Grid's planning application for the High Marnham substation. There is a "lock" in the draft DCO on the effects included in the ES in order to ensure the effects of the Proposed Development are not materially worse or different to those included in the ES; Schedule 15, paragraph 2(3)(a) requires that when the Applicant submits anything to the relevant planning authority to be approved under a requirement, the Applicant must include a statement to confirm whether it is likely that the subject matter of the application will give rise to any materially new or materially different environmental effects compared to those in the ES and if it will then it must be accompanied by information setting out what those effects are. The relevant planning authority can then decide whether to approve the requirement, with this information (amongst other things) in front of it. There is therefore a lock so that even if the assumptions the ES is based on change, the effects will not be materially worse than those assessed.

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WR17	South Clifton Parish Council [REP1-097]	Public Rights of Way The local footpath and bridleway network is vital to our rural lifestyle. We support their protection and enhancement. A proposed permissive path from the A57 (Newton on Trent) southward through panel fields and past the BESS site must avoid feeling claustrophobic. Maximum panel spacing (100m) and significant planting are needed to maintain a pleasant experience. According to the masterplan, the 2.5km path lacks trees on its northern section. There is minimal softening of the landscape across the eastern Trent area. We urge preservation of hedgerow trees and stress that no veteran trees (15 listed) should be felled. Their exact locations must be highlighted and safeguarded.	The Design Approach Document [AS-013] explains how the Applicant has sought to maintain one side of public right of ways open and free from above ground infrastructure. Where this has not been possible, the Applicant has embedded a minimum 15m offset to Works Area 1 which in many instances extends far beyond 15m and with hedgerows, trees and grassland provided within the offset. With regard to the proposed permissive path heading southward from the A57 past the proposed BESS site, there is currently a minimum offset of 10 m from the centre of the permissive path and the fence line. The actual distance will likely vary and in any case be confirmed during detailed design which will be approved under Requirement 5 of the DCO. The Illustrative Masterplan [APP-018] gives an indication of how this could be realised. With regard to the existing hedgerow trees and veteran trees, offsets have been embedded within the Outline Design Parameters [REP1-021] to avoid and minimise the removal of existing vegetation on Site. The Outline Landscape and Ecology Management Plan [REP1-053] also includes a commitment to the retention and protection of all veteran trees with specific reference to BS 3998:2010 Treework – Recommendations and to BS5837:2012 Trees in relation to design, demolition and construction – Recommendations.
WR18	South Clifton Parish Council [REP1-097]	Access Points (Eastern Side of River Trent) SCPC notes five direct road access points and three internal ones. In our consultation feedback, we requested no access via Moor Lane, South Clifton. Despite reassurances, two access points are now proposed there. We also warned about the dangers of an access point off the A1133 near a blind slope—this too	The access junctions on Moor Lane are located to the east of the A1133 corridor and avoid the section of Moor Lane located to the west of the A1133, avoiding bringing traffic close to the village of South Clifton, as promised. With regards to the locations of construction accesses, these are illustrated in the Transport Assessment [REP1-045],

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		was ignored. Accidents are common on this stretch. These concerns have not been adequately addressed, and the proposed access points remain unacceptable.	Gate F is provided on the A1133 and this located where no blind slopes are located. Gate G is also provided on the A1133. Suitable visibility is available and a review of the online resource crashmap.co.uk does not reveal any clusters of accidents in this vicinity. The junction of Moor Lane (West) also does not feature any significant changes in vertical geometry.
WR19	South Clifton Parish Council [REP1-097]	Lone Field The small, southernmost field opposite The Chase at the Moor Lane/A1133 junction remains in the plan despite feedback asking for its removal. Its inclusion, with an access point and inverter near a home now surrounded on three sides, appears unjustifiable. It may suggest future development intent.	As per the Outline Design Parameters [REP1-021], inverters will be located 100m from all residential properties as far as practicable and will not result in a noise level greater than 35dB(A) at night. An offset on the western edge of the small, southernmost field opposite The Chase has been incorporated to maintain open views south from The Chase, and to minimise visibility from the curtilage and gable end windows. To the north, a minimum offset of 60m has been incorporated between the solar PV Site and the edge of the property boundary, while to the east this offset is approximately 80m. The proposed access to this land parcel has been sited to the west of the residential property at the junction of Moor Lane and the A1133 so as to ensure that construction and operational vehicles accessing or egressing are not interacting with any local traffic movements at the junction.
WR20	South Clifton Parish Council [REP1-097]	Accompanied Visits SCPC suggest the following sites on the east side of the River Trent for accompanied visits –	The Applicant submitted a draft itinerary for the ASI based on the requests that had been submitted in Deadline A, as well as homes mentioned in relevant representations, discussions

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		• The Chase and Moor Farm, Moor Lane, South Clifton. • Moor Farm, North Clifton. • Station House, North Clifton and east along Sustrans to Wheatholme Lane crossing. • The Hall, North Clifton. • A1133 access point north of Sustrans track. • Layby on A1133 North Clifton – views across open country to Lincoln Cathedral. • Viaduct over River Trent. • Field south of Hall Reservoir, North Clifton.	with 'Say no to One Earth', and in consideration of the USIs that have already been completed by the ExA. This includes most of the sites listed here, with the exception of the Field South of Hall Reservoir in North Clifton. The Applicant has no objection to adding this point to the final ASI itinerary.
WR45	West Lindsey District Council [REP1-099]	Cumulative impacts 5.3. WLDCs key concerns and objections to the OESF relate to its cumulative impact with other NSIP solar electricity generating stations that have either been consented or are awaiting decision. 5.4. There are four other NSIP solar schemes to which the OESF will add further significant impacts to the West Lindsey District: 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.) - Decision stage 5.5. The OESF Order Limits extend to approximately 1,414ha (14.14km2) and would add a further 750MW of solar development to the existing cumulative baseline. This would result in a total cumulative Order Limits land take of approximately	A Joint Interrelationship Report [REP1-074] was submitted at Deadline 1 which considers the cumulative effects of the nearest NSIP solar schemes located within 16km of the Proposed Development. This includes Cottam Solar Project, Gate Burton Energy Park, Great North Road Solar and Biodiversity Park, West Burton Solar Project, Fosse Green Energy, Tillbridge Solar, Steeples Renewables Project. In addition, an update to the Transport Assessment [REP1-045] was submitted at Deadline 1 incorporating committed developments. The findings from both these assessments confirm there are no inter-project cumulative significant effects on any environmental aspect. This is consistent with the most recent Joint Interrelationship Report, submitted for Tillbridge Solar on 3 April 2025 as part of Deadline 6 for that application. The Applicants Joint Interrelationship report also considers the North Humber to High Marnham Overhead Lines and the proposed High Marnham Substation, which lies within the Order Limits. As outlined in the Joint Interrelationship Report and Chapter 18: Cumulative Effects [APP-047] with the North Humber to High Marnham Overhead Lines there is a

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		6,244ha/ 62.44km2 and total generation of 2,861MW / 2.861GW. 5.6. This amount of solar development within a close geographical area is unprecedented and gives rise to significant adverse impacts that have not been experienced on a cumulative basis in England. 5.7. From the commencement of the examination of the first NSIP solar application, WLDC have raised significant concerns regarding the cumulative impacts of all of the projects and the approach to decision making. Whilst NSIP applications are examined and determined on an individual basis with cumulative impacts extending only to recognition that such assessments have been carried out in an ES, WLDCs consistent view is that the applications should have been determined on the basis of their acceptability as a group of projects. The impacts of all of the NSIPS against the baseline of a rural agricultural environment will be significant and harmful, including the construction phase. 5.8. The overarching policy context for the consideration of cumulative impacts are set out in the relevant NPSs. NPS EN-1 requires the Secretary of State, when considering any proposed development and weighing its adverse impacts against its benefits, to take into account "its potential adverse impacts…including any long-term and cumulative adverse impacts" (NPS EN-1 para. 4.1.5). WLDC Written Representations - One Earth Solar Farm Page 12 of 36 5.9. Applicants are required to set out how residual impacts will be compensated for as far as possible, setting out how any mitigation or compensation will be monitored and agreed to ensure success and that action is taken (including adaptive management). Cumulative impacts of	moderate to major adverse cumulative effect (significant), on the visual amenity of PRoW users south of East Drayton during both construction and operation. The Inter-Project Effects Assessment Methodology is set out in Chapter 18: Cumulative Effects of the ES [APP-047] and has been undertaken in accordance with the Planning Inspectorate's (PINS) Advice on Cumulative Effects Assessment. The Applicant is committed to working with other developers to reduce potential cumulative impacts. The Applicant has included a commitment to seek opportunities to work with other scheme, especially should there be any temporal construction overlaps via the outline Construction and Environmental Management Plan (oCEMP) [REP1-048] and the outline Construction Traffic Management Plan [REP-1-055].

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		multiple developments with residual impacts must also be considered (NPS EN1 para, 4.2.12). 5.10. WLDC's concerns around the potential cumulative construction period is derived from the lifespan of the DCOs that have been granted or sought, and the estimated construction periods cited in the respective project ESs. 5.11. The DCO lifespan being sought for projects is 5 years and the estimated construction period is 24 months, aside from the Gate Burton Energy Park which cites a period of 24-36 months. 5.12. Based upon these parameters for the 4 NSIPs either consented, at decision stage or in examination, plus the 5th NSIP due to be submitted shortly, a simple 'staggering' of development periods within the 5-year validity period for each consent could lead to construction activity occurring up to 2033. There is no control over the commencement of construction aside from that it must do so within 5 years of the Orders coming into force. 5.14. WLDC have concerns that the cumulative effects of these NSIP solar schemes in particular have not been carried through adequately to the cumulative assessment, in particular in relation to traffic impacts. For example, the table at Appendix A.18.2 [APP146] indicates that the Tillbridge solar DCO scheme has not been taken forward to the cumulative assessment. However, as indicated above the reported temporal scopes overlap, and, from an analysis of Figure 6 of the OESF Transport Assessment [APP-136] and Figures 1 and 2 in Appendix B of the Tillbridge Framework Constriction Traffic Management Plan [Tillbridge REP5-020] the general construction traffic routes appear to overlap on the A57, as do abnormal indivisible load (AIL) routes. The AIL routes also coincide,	

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		particularly along the A15. WLDC would like to request the applicant reviews the cumulative assessment and further justifies the exclusion of the 5 solar schemes listed above from cumulative assessments. 5.15. WLDC consider this period to be a significant length of time for residents to endure and highlight the impact as one that should be considered negatively in the planning balance. 5.16. The matters below discuss further specific impacts in more detail	
WR46	West Lindsey District Council [REP1-099]	Lifespan of the project and its impacts 5.17. The proposed lifespan of the project is to be for a period of 60 years. This is consistent with the other four NSIP solar schemes in the district, who have either secured or are seeking a consent for this period of time. 5.18. NPS EN-3 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 (para. 2.10.65). 5.19. The applicant considers the Scheme to constitute a 'temporary' development and have applied this to is assessment of impacts in the ES. This has resulted in the impacts being factored on the basis that they will only be experienced on a temporary basis. 5.20. WLDC consider a 60-year timescale to be a significant period time, lasting over several generations. It will result in its impact being no different to that of permanent development. The OESF would exist, potentially alongside other cumulative NSIP solar projects, up to and beyond the year 2090.	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.

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		5.21. To reduce or downgrade impacts on the basis that 60 years is 'temporary' results in a false outcome. WLDC consider that impacts should have been assessed on the basis that they were effectively 'permanent'. All assessments should have been carried out on the basis that the impacts would be permanent to reflect the time period over which they would be experienced. 5.22. WLDC considers that the application should be determined on the basis that the impacts of the OESF on communities and the environment are permanent in planning terms.	
WR47	West Lindsey District Council [REP1-099]	Landscape and visual 5.23. WLDC raises objections to the Scheme due to its cumulative impact, alongside other NSIP solar projects, on landscape character and the visual effects people will experience in the district. 5.24. WLDC notes that the applicant has provided a drawing that identified the approximate location of other projects through numbered circles (Figure 18.9 / Drawing Number EN10159/APP/6.20/18.9). Whilst serving as a useful reference, WLDC wishes to see a drawing that shows the true extent of solar farm coverage in the area. Were such a drawing produced with, for example, the Order Limits/red-line boundaries of other projects shown, the extend of land lost to solar farm development and the proximity to each other would be revealed. WLDC considers that this exercise is required in order for the cumulative impacts of the OESF project to be properly considered. WLDC request that proposed large vehicle and AIL routes are included in this drawing or set of drawings, along with context background mapping showing flood risk zones and agricultural land	As explained during Issue Specific Hearing 1 (ISH1) and detailed within the Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-077], the Applicant's approach to assessing cumulative landscape and visual effects is consistent with the Planning Inspectorate's guidance on cumulative effects. With regard to cumulative impacts with other NSIP solar projects, the Applicant also explained that this has been considered within the DCO examinations for Cottam, West Burton, Gate Burton and Tillbridge, which all found there to be no potential for significant cumulative effects with One Earth Solar Farm. The Joint Interrelationships Report from the Tillbridge has been submitted to the One Earth Examination Library at Deadline 1 and is found at Appendix D of the Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-077] as well as the Technical Note on Cumulative Effects of Additional Schemes that was submitted to the Cottam Solar Project Examination which is found at Appendix E of the Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-077].

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		classification.	A Joint Interrelationship Report [REP1-074] was submitted at Deadline 1 which considers the cumulative effects of the nearest NSIP solar schemes located within 16km of the Proposed Development. This includes Cottam Solar Project, Gate Burton Energy Park, Great North Road Solar and Biodiversity Park, West Burton Solar Project, Fosse Green Energy, Tillbridge Solar, Steeples Renewables Project. The order limits of these projects are presented in Figure 2 of the Joint Interrelationship Report, The findings confirm there are no inter-project cumulative significant effects on any environmental aspect. As above, this is consistent the most recent Joint Interrelationship Report, submitted for Tillbridge Solar on 3 April 2025 as part of Deadline 6 for that application (found at Appendix D of the Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-077]). The Joint Interrelationship report also considers the North Humber to High Marnham Overhead Lines and the proposed High Marnham Substation, which lies within the Proposed Development Order Limits. As outlined in Chapter 18: Cumulative Effects [APP-047] with the North Humber to High Marnham Overhead Lines there is a major adverse cumulative effect (significant), affecting the visual amenity of PRoW users south of East Drayton during both construction and operation.
WR48	West Lindsey District Council [REP1-099]	Landscape Character 5.25. WLDC consider that it is essential that, when considering the acceptability of the Scheme, it must be done so with regard to the cumulative impact with other solar NSIP projects either consented or awaiting decision in the area.	As explained during Issue Specific Hearing 1 (ISH1) and detailed within the Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-077], the Applicant's approach to assessing cumulative landscape and visual effects is consistent with the Planning Inspectorate's guidance on cumulative effects. With regard to cumulative impacts with other NSIP solar projects, the Applicant also

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		5.26. NPS EN-3 (paragraph 2.10.257) states that the Secretary of State will consider the landscape and visual impact of any proposed solar PV farm, taking account of the effect of the development on landscape character, together with the possible cumulative effect with any existing or proposed development. 5.27. CLLP Policy S14 states that renewable energy schemes will be supported where impacts on landscape character and visual amenity are acceptable. To establish compliance in terms of 'acceptability', the impacts must be tested against other applicable policies in the Local Plan. 5.28. Policy 53 is an applicable policy that must be satisfies to comply with Policy S14. S54 requires all development to achieve 'high quality sustainable design that contributes positively to local character, landscape and townscape, and supports diversity, equality and access for all' and that 'good design will be at the centre of every development proposal…'. Policy S53 provides a range of criteria for projects to demonstrate compliance which, although written in a form that relates to a wide range of developments, it includes policy that relates to the OESF proposal including; ▪ Integrating into its surroundings; ▪ Relating well to a site's local and wider context to enhancing existing character and instinctiveness to ensure development can satisfactorily assimilated into the surrounding area; ▪ Enhancing existing character; ▪ Making effective and efficient use of land; ▪ Incorporate and retain as far as possible existing natural features; ▪ Minimise the need for resources both in construction and operation	explained that this has been considered within the DCO examinations for Cottam, West Burton, Gate Burton and Tillbridge, which all found there to be no potential for significant cumulative effects with One Earth Solar Farm. The Joint Interrelationships Report from the Tillbridge has been submitted to the One Earth Examination Library at Deadline 1 and is found at Appendix D of the Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-077] as well as the Technical Note on Cumulative Effects of Additional Schemes that was submitted to the Cottam Solar Project Examination which is found at Appendix E of the Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-077]. The cumulative landscape and visual assessment focusses on a 2km Zone of Influence, including land within indsey District, as this was considered to be a proportionate area in which significant landscape and visual effects could be experienced. This was established based on a number of factors including an understanding of the prevailing landform, vegetation patterns, and the emerging design parameters. The Applicant is not of the same view that 'the impacts will not be assimilated into the landscape'. 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."*

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		5.29. In assessing compliance with the above criteria, the supporting ES does not provide an assessment beyond a study area boundary of 2km. As a consequence, there is no formal assessment of the magnitude of the cumulative landscape character change within the West Lindsey District. 5.30. The landscape of West Lindsey is characterised by the large, open agricultural fields. In planning policy terms Local Plan Policy S1 determines that the entire Order Limits within WLDC are in "Countryside". The implementation of the cumulative solar farm projects will have a marked change on that landscape character area, being wholly contrary to the defining and valued character of the Till Vale landscape character area. 5.31. The erosion of this landscape through the quantum of development being imposed is unprecedented and will cause material harm for over 60 years. The impacts will not be assimilated into the landscape 5.32. The extent and amount of land that will host alien solar farm development within the district, coupled with the lack of assessment, fails to comply with NPS EN-1 and CLLP policies S14 and S53.	
WR49	West Lindsey District Council [REP1-099]	Visual effects 5.33. The OESF will be experienced as part of cumulative series of NSIP scale solar farms within the district. It will represent the first project encountered when travelling into the district from the south-east, following which the spread of solar farm development extends beyond Gainsborough to the northern extent of the Cottam Solar Project (a distance of circa. 24km/15 miles) 5.34. The sequential experience of solar farm infrastructure by communities and visitor travelling through	As explained during Issue Specific Hearing 1 (ISH1) and detailed within the Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-077], the Applicant's approach to assessing cumulative landscape and visual effects is consistent with the Planning Inspectorate's guidance on cumulative effects. With regard to cumulative impacts with other NSIP solar projects, the Applicant also explained that this has been considered within the DCO examinations for Cottam, West Burton, Gate Burton and Tillbridge, which all found there to be no potential for

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		the landscape will be harmful, with travellers experiencing a feeling of solar farm “fatigue” and with increasingly limited visual relief spanning distance of over 13 miles. The OESF will add to the existing impacts extending the area of impact. 5.35. The cumulative impact caused by the addition of the OESF to the cumulative projects represents a clear tipping-point to which the landscape character is unable to reasonably accommodate further change as a consequence of solar farm development. 5.36. The OESF does not comply with relevant NPS’ and nor the CLLP policy with regard to its impacts on landscape character and visual effects.	significant cumulative effects with One Earth Solar Farm. The Joint Interrelationships Report from the Tillbridge has been submitted to the One Earth Examination Library at Deadline 1 and is found at Appendix D of the Written Summary of Applicant’s Oral Submissions at the ISH1 [REP1-077] as well as the Technical Note on Cumulative Effects of Additional Schemes that was submitted to the Cottam Solar Project Examination which is found at Appendix E of the Written Summary of Applicant’s Oral Submissions at the ISH1 [REP1-077]. The Applicant disputes the point that the One Earth Solar Farm represents a *‘clear tipping-point to which the landscape character is unable to reasonably accommodate further change as a consequence of solar farm development’* because the project has continually sought to embed good design into the Proposed Development. With regard to sequential cumulative effects, in line with PINS Guidance – Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment, and considering the principle of proportionality and relevance, the cumulative effects assessment adopts a receptor-led approach, focusing on projects with spatial and temporal overlap that may result in significant in-combination effects. The Applicant is of the view that a sequential cumulative assessment is more appropriate for regularly used routes like major roads, railway lines, ferry routes, popular paths, rather than a convoluted journey that would intentionally pass by any solar infrastructure in the area. The Applicant considers there to be no regularly used routes where sequential cumulative impacts with other NSIPs would be a relevant consideration, and further, no such routes have been identified by WLDC during the pre-application stage.

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WR50	West Lindsey District Council [REP1-099]	Construction traffic 5.37. The impact and management of cumulative construction traffic has been an issue that WLDC has consistently raised as a significant concern. 5.38. NPS EN-1 recognises that NSIP proposals can have a variety of substantial impacts on the surrounding transport infrastructure (para. 5.14.1). The Secretary of State should seek to ensure that the mitigation of transport impacts, including during construction, have been considered (para. 5.14.18). 5.39. NPS EN-1 further states that, where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the Secretary of State should consider requirements to mitigate adverse impacts on transport networks arising from the development (para. 5.14.19) 5.40. NPS EN-3 states the importance of assessing various potential routes to the Order Limits or the delivery of materials and components during the construction period and the suitability of access roads for construction vehicles. 5.41. Paragraph 115 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. It also states that development should minimise the scope for conflict between pedestrians, cyclists and vehicles. 5.42. The Scheme proposes two construction vehicle access routes to the site (APP-136, 6.21 Appendix 12.2 Transport Assessment, Figures 3-1 and 3-2).	The Council appears to have confused the proposed construction access route and the proposed Abnormal Indivisible Load (AIL) routes. The construction access routes are described in the Transport Assessment [REP1-045]. This indicates access primarily from the south and east, with no access proposed from the A15. The AIL access route is illustrated in Appendix A of the Transport Assessment [REP1-045]. Route 1 for just the transformer loads uses the A15. The traffic using this is for two AIL and as such will not have a significant traffic impact on this route. Cumulative traffic matters have been considered and the assessment is based upon the published dates of construction. As such, no further assessment is considered reasonable or necessary. The Applicant is happy to liaise with neighbouring developers on traffic management measures makes this commitment in Section 7.3 of the oCTMP [REP1-055]. The approach adopted in the assessment of cumulative traffic is standard and compliant. The Applicant notes that Lincolnshire County Council as local highways authority for the area containing North Lindsay District Council, does not share the concerns expressed by the District Council.

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		5.43. Proposed Access Route 1 begins at ABP Immingham, and uses the A180, M180, A15, A46, A57 and A1133 to access the site. 5.44. Proposed Access Route 2 begins at Goole Docks and proceeds to the site using the A161, M62, M18, A1(M), A1 and A57 to access the western site access. 5.45. The cumulative projects Gate Burton, Cottam, West Burton and Tillbridge solar farm NSIPs all utilise the A15 for the delivery of construction traffic. 5.46. The OESF project does not assess the additional construction traffic that it will impose on the local highway network cumulatively with the other NSIP solar projects. This is particularly relevant when considering the impacts of construction traffic using the A15, which is a highway also to be used by other solar projects. The OESF, Gate Burton, West Burton, Cottam and Tillbridge solar projects will all be utilising the A57. 5.47. It is therefore very clear that construction traffic associated with multiple NSIP scale solar farm projects could be using the A15 and the A57 during the same periods. 5.48. The reason given by the applicant in excluding the Cottam Solar Project and the Tillbridge Solar Project from a cumulative assessment was that it would not coincide with the same construction period as the OESF. This assertion is incorrect as the five-year lifespan of the DCOs either granted, or sough to be granted, would allow for all of the projects to be constructed at the same time. As none of the consented NSIP solar farms have even yet to submit details to discharge their 'requirements' the likelihood of concurrent construction traffic using local highways increases.	

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		5.49. As data for all cumulative projects is in the public domain, an assessment of the potential cumulative traffic impacts should be carried out. As submitted, there is insufficient detail to robustly assess these impacts. 5.50. Should the applicant amend their application by committing to using Proposed Access Route 2 only, the adverse cumulative impacts along the A15 and the A57 within the West Lindsey District would be avoided. Such a commitment would minimise the impacts upon communities in terms of disruption, noise and air quality impacts, and additional traffic management that could extend for a period of 5-10 years should all five NSIP projects overlap/stagger their construction phases. 5.51. The developers promoting the other solar NSIP projects of Gate Burton, Cottam, West Burton and Tillbridge, worked collaboratively to produce a 'Joint Report on Interrelationships'. This report set out the respective impacts of each project, including cumulatively, and provided commitment to joint working to minimise impacts during construction. This included construction traffic. The OESF has not engaged, however,with other developers and there remains no commitment to work collaboratively to minimise impacts for communities and visitors. 5.52. The potential cumulative impacts of construction traffic on the amenity of local residents and visitors, and the lack of full assessment and commitment to collaborative working with cumulative projects falls contrary to NPS EN-1 and CLLP Policy S47.	
WR51	West Lindsey District Council [REP1-099]	Tourism	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

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		5.53. WLDC considers that there is potential for the proposal to have a negative impact upon the tourism economy within the West Lindsey District. 5.54. NPS EN-1 states that the Secretary of State should have regard to the socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision (para. 5.13.9). 5.55. The cumulative impacts of all of the NSIP solar projects in the district during construction upon tourist accommodation availability and reducing the attractiveness of the area for visitors is a key concern and an adverse impact. 5.56. The likelihood of construction phase of the five NSIP projects occurring concurrently, potentially up to a period of between five and ten years, will result in the current tourist accommodation being saturated to meet this demand. 5.57. This would have an adverse impact upon the tourism sector through the reduction in the availability of accommodation for tourists and visitors to the West Lindsey district. Due to the potential lengthy cumulative construction period of a number of years, the ability for tourist accommodation businesses to recover once construction is complete is unknown and it is feared it would take significant time to do so. 5.58. The tourist industry is already engaged in recovery following the impacts of Covid 'lockdown' periods and requires capacity for tourists to re-establish growth. 5.59. Whilst the influx of construction workers using existing accommodation could be deemed to have a temporary positive economic impact, it does not take account of the wide linked industry benefits that is	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]. • 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 persons 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 from Visit Britian indicates some existing hotel capacity to accommodate additional cumulative demand. Data for the West Midlands region indicated average room

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		inherent to the tourism sector. Visitors to the district staying in local accommodation will also, for example, visit local destinations, attractions, events and local services. 5.60. With construction traffic and associated works being carried out during the summer months and clashing with peak agricultural traffic (harvest) and the Lincolnshire Show, visitors and tourists will experience considerable frustration particularly those using the A15 and the nearby highway network. 5.61. The availability of accommodation for visitors to the district are likely to be significantly reduced over a long period of time during the construction phases of the five NSIP projects cumulatively. This will have an adverse impact upon the wider tourist sector in the district, materially affecting its ability to recover from the 'Covid' period and achieve growth ambitions. 5.62. The effects on the tourist economy will be contrary to the intended aims and principles of Local Plan Policy S43, which seek to promote sustainable rural tourism.	occupancy of 72% in 2023; 77% in 2024 and 76% in 2025. These data suggest capacity to accommodate additional demand which would have associated positive economic effects. Further accommodation provision could be provided by flexible renting options such as Air B&B. Further potential sources of accommodation may be via private rented accommodation; latest census data from 2021 indicates the percentage of vacant homes range from 5.21% (Bassetlaw); 4.71% (Newark and Sherwood) and 5.02% (West Lindsay). Due to these factors, the potential effect upon the demand for these facilities both for the Proposed Development in isolation and cumulatively was scoped out from detailed assessment as significant effects were unlikely to occur. Furthermore, the two-year construction period would limit the scale of any potential effects. In regard to potential operational effects upon tourism, The Applicant has considered a 2013 Cornwall Study which provides some data on the relationship between tourism and solar farms. This data shows that the majority of visitors were unaware of the presence of solar farms, and their decision to visit would not have been influenced by their presence. 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. While this study is not directly comparable to the Proposed Development, the data does indicate that the presence of solar infrastructure similar does not significantly affect tourism demand.

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			As detailed in WR50, the construction access routes are described in the Transport Assessment [REP1-045], the A15 is only to be used by two AIL movements. The timings of these would avoid events such as the Lincolnshire Show.
WR52	West Lindsey District Council [REP1-099]	Agricultural land 5.63. The significant impacts caused by the cumulative loss of agricultural land available for the production of food. 5.64. Paragraph 5.11.12 of the NPS (EN-1) outlines that applicants should "seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations". 5.65. Under Paragraph 5.11.34 of the NPS (EN-1), the decision maker should ensure that "applicants do not site their scheme on the best and most versatile agricultural land without justification The SoS should also 'take into account the economic and other benefits of that land". 5.66. The NPPF also states that BMV is land in grades 1, 2 and 3a of the Agricultural Land Classification and recognises the economic and other benefits of such land (para. 187). Footnote 65 states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. 5.67. Policy S67: Best and Most Versatile Agricultural Land of the CLLP 2023 states that significant development resulting in the loss of the best and most versatile agricultural land will only be supported if:	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 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. Additionally, the use of the land is temporary. During the operational life of the development the soil will be managed in accordance with be managed in accordance with the Soil Management Plan [REP1-057] to ensure no long term impacts ion soil health. Permanent loss has been kept to a minimum

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		▪ The need is clearly established; ▪ The benefits outweigh the need to protect such land, when taking into account the economic and other benefits of the best and most versatile agricultural land; ▪ The impacts of the proposal upon ongoing agricultural operations have been minimised through the use of appropriate design solutions; and ▪ Once the development has ceased its useful life then the land should be returned to its former use. 5.68. WLDC wishes to emphasise the importance of preserving agricultural land, particularly Best and Most Versatile (BMV) land, in line with national and local planning policies. The council expects that any development on such land must demonstrate clear economic value to the district and ensure restoration to its original agricultural use. This is crucial given the land's contribution to the local economy, environment, and cultural identity. 5.69. The proposed OESF (solar farm) project involves the loss of agricultural land classified as Grades 2 and 3a—categories considered BMV. Although the grazing of livestock alongside solar panels is technically considered food production, WLDC argues that this alone is insufficient to meet policy requirements unless it is clearly demonstrated that the land will remain genuinely accessible for agricultural tenants throughout the project's 60-year lifespan. 5.70. Unlike other Nationally Significant Infrastructure Projects (NSIPs), which have largely avoided BMV land, the OESF proposal places significant infrastructure—including solar panels, a substation, and a battery energy storage system (BESS)—directly on highquality	

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		agricultural land. This approach, according to WLDC, fails to prioritize the protection of valuable farmland and disregards planning policy preferences. 5.71. The cumulative effect of removing substantial areas of productive land from food production is seen as a significant and unacceptable negative impact. WLDC concludes that the scheme does not adequately mitigate or justify the loss of BMV land and therefore does not align with established planning principles.	
WR53	West Lindsey District Council [REP1-099]	Maintenance and replacement 5.72. WLDC has significant concerns regarding unassessed environmental impacts associated with the long-term maintenance of the OESF solar project, particularly regarding the replacement and disposal of infrastructure components such as solar panels and battery energy storage systems (BESS). The draft Development Consent Order (dDCO) grants broad powers for maintenance, allowing piecemeal replacement of components over the project's 60-year lifespan. While individual replacement events may fall below Environmental Impact Assessment (EIA) thresholds, their cumulative effect could be significant. 5.73. WLDC notes that solar panels typically require replacement after around 20 years, and BESS will also need full replacement. However, there is currently insufficient recycling capacity in West Lindsey, Lincolnshire, or even the UK to manage this waste. The application documents lack clarity on how replaced materials will be handled or recycled, and no baseline or future recycling strategy is provided. This is contrary to Local Plan Policy S10.	The 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."*

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		5.74. Given that multiple Nationally Significant Infrastructure Projects (NSIPs) may follow similar replacement patterns without oversight, WLDC is concerned about the potential for adverse environmental and community impacts. The council calls for greater transparency and control over maintenance-related waste to ensure long-term sustainability and compliance with environmental standards.	Construction, operation and decommissioning have been assessed in Appendix 2.3 Materials and Waste Impact Assessment [APP-082]. Operational replacement, either planned or due to adverse weather or other events, are covered in the operational assessment and since the decommissioning assessment concludes no significant effects any operational replacement would be of a lesser magnitude of impact. At Deadline 2, the Applicant has updated the outline OEMP [REP1-049] to include a commitment to provide an annual planning maintenance schedule. This would require the Applicant to report to the relevant planning authorities on its expected activities in the upcoming twelve months, including waste generation, transport requirements, and details of any trees that require removal and if they are proposed to be replaced. The schedule would also confirm that the environmental effects that are likely to arise as a result of the proposed maintenance and the environmental controls to be implemented are not materially worse than those reported in the ES. This provides a further check on the scope of the activities undertaken during operation, including with respect to waste and is also designed to support and assist the Councils in anticipating waste likely to be generated.
WR54	West Lindsey District Council [REP1-099]	Project design 5.78. West Lindsey District Council (WLDC) has reviewed the design approach of the OESF solar project, as outlined in the submitted documents, including the 'Design Approach Document' and 'Outline Design Parameters'. While national policy (NPS EN-1) and local policy (S14) both emphasize the importance of good design in renewable energy developments—particularly in mitigating adverse impacts on landscape and visual	Embedding good design has been a priority for One Earth Solar Farm since its inception, as explained in the Design Approach Document [AS-013] and reflected in the project specific vision and design principles which are set out to ensure the project is designed to the highest standards and following best practice. This includes the siting of project infrastructure in areas away from sensitive receptors as much as practically possible, distances that are to be

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		amenity—WLDC finds the OESF design lacking in this regard. 5.79. The council acknowledges that solar farms often require specific site characteristics, but stresses that developers must still minimize visual and environmental impacts. However, the OESF project places solar panels, a substation, and a battery energy storage system (BESS) up to 13.5m high, according to the height parameter plans [APP-016], in highly visible locations, including a large open field east of the A1133. These installations are clearly visible from within West Lindsey and the neighbouring Newark and Sherwood District, raising concerns about their visual prominence and the lack of integration with the surrounding landscape. 5.80. WLDC argues that the design fails to demonstrate how national and local design policies were meaningfully applied. The placement of large infrastructure on open, high-quality agricultural land—areas that policy suggests should be avoided—reflects a flawed design strategy. The council believes that better design choices could have reduced the visual and environmental impact, such as placing bulkier infrastructure in less exposed areas or using natural features for screening. 5.81. Additionally, the layout places solar panels directly up to field boundaries, creating a harsh visual edge and reducing the landscape's natural character. WLDC expected the design to include buffer zones to soften the visual impact and preserve the prominence of field boundaries, especially from key viewpoints like the A1133 and nearby public rights of way. 5.82. In conclusion, WLDC finds the current design approach inadequate in addressing landscape and visual	secured through the Outline Design Parameters [REP1-021], and OLEMP [REP1-053]. NPS EN-1 explains at paragraph 4.7.1 that good design extends beyond aesthetic considerations and paragraph 4.7.2 also acknowledges that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area. Although it may not contribute to the enhancement of the area in which it is placed, it can be designed in such a way that it is sensitive to its surroundings and embeds well within the landscape. The BESS and substations have been sited in line with the Outline Design Parameters [REP1-021] which considers offsets to landscape features, and noise rating levels on residential receptors. The Proposed Development has also been refined with regard to Agricultural Land Classification and areas at risk of flooding, and constructability. The eastern BESS and substation are located at the foot of a slight hill which rises towards the A1133, which is the furthest east of the A1133 without being in areas at risk of flooding.

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		concerns and believes alternative design strategies could have significantly reduced the scheme's adverse impacts.	Whilst it is correct that the height parameter plan identifies that the substation will be up to 13.5m above existing ground level, the Outline Design Parameters states that the footprint of the substation (located east of the River Trent) will occupy a maximum area of up to 23,800m^2. This equates to 12.6% of the combined 188,305m^2 of the eastern BESS and substation Work Areas 2 and 3. Ancillary buildings located within the substation compound will measure a maximum height of 8m tall, however these will cover only cover a maximum footprint of 1200m^2, equating to less than 1% of Work Areas 2 and 3. The remaining area would be up to the height of 3.5m above existing ground level identified for the BESS, as is also stated in the Outline Design Parameters. Within the OLEMP [REP1-053] at paragraph 5.3.9., the Applicant has committed to managing existing hedgerows to increase screening including filling in gaps and thickening hedgerows with a broad range of native species as well as planting additional hedgerow trees. The A11333 carriageway is located approximately 20-25m from the start of the solar panels so with the management of roadside hedgerows as outlined above, the visual impact of solar panels, BESS and substation on motorists along the A1133 will reduce overtime.
WR55	West Lindsey District Council [REP1-099]	Landscape and visual 5.83. West Lindsey District Council (WLDC) has expressed significant concerns regarding the landscape and visual impacts of the proposed OESF solar farm. The council believes the development will result in substantial and adverse effects on the district's landscape character and visual amenity, affecting both local communities and visitors.	The BESS and substations have been sited in line with the Outline Design Parameters [REP1-021] which considers offsets to landscape features and noise rating levels on residential receptors. The Proposed Development has also been refined with regard to Agricultural Land Classification and areas at risk of flooding, and constructability.

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		5.84. In assessing these impacts, WLDC has referred to national policy statements NPS EN-1 and EN-2, as well as the adopted Local Plan. NPS EN-1 acknowledges that most nationally significant infrastructure projects will have some adverse landscape effects but stresses the importance of careful design to minimise harm. It requires developers to consider siting, operational constraints, and mitigation measures. Similarly, Local Plan Policy S14 mandates that renewable energy proposals must demonstrate that their direct, indirect, individual, and cumulative impacts are acceptable, particularly in terms of scale, siting, and design. 5.85. WLDC argues that the OESF project fails to meet these standards. The substation and battery energy storage system (BESS) are proposed in highly visible, open locations within West Lindsey, while solar panels are sited close to field boundaries and public highways. This layout results in infrastructure that is visually intrusive and inconsistent with the rural character of the area. 5.86. Specific viewpoints highlight these concerns. From Viewpoint 2a, located on higher ground to the west, the solar panels will interrupt long-distance views toward Lincoln Cathedral—a Grade I listed building—within one of the most sensitive landscape character areas identified in the West Lindsey Landscape Character Assessment. Viewpoint 4, from the A1133 site entrance, reveals plans for a solid wooden fence that WLDC considers inappropriate for the rural setting, further degrading the landscape during the multi-year construction period. 5.87. The eastern BESS area is identified on the height parameter plans [APP-016] as having a maximum height of 13.5m. It should be noted that, according to plans submitted by Anglian Water for the works currently being	The eastern BESS and substation are located at the foot of a slight hill which rises towards the A1133, which is the furthest east of the A1133 without being in areas at risk of flooding. Whist it is correct that the height parameter plan identifies that the substation will be up to 13.5m above existing ground level, the Outline Design Parameters states that the footprint of the substation (located east of the River Trent) will occupy a maximum area of up to 23,800m^2. This equates to 12.6% of the combined 188,305m^2 of the eastern BESS and substation Work Areas 2 and 3. Ancillary buildings located within the substation compound will measure a maximum height of 8m tall, however these will cover only cover a maximum footprint of 1200m^2, equating to 1% of Work Areas 2 and 3. The remaining area would be up to the height of 3.5m above existing ground level identified for the BESS, as is also stated in the Outline Design Parameters. Within the OLEMP [REP1-053] at paragraph 5.3.9., the Applicant has committed to managing existing hedgerows to increase screening including filling in gaps and thickening hedgerows with a broad range of native species as well as planting additional hedgerow trees. This will apply to the western site boundary adjacent to the A1133 which will reduce the visual impact of solar panels, BESS and substation on motorists overtime. Widths vary along the course of the road, however approximate distances of between 20-25m exist between the carriageway and start of the solar panels, featuring a grass verge and positively managed hedgerow to aid in screening and filtering views of the development.

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		undertaken at the Hall Water Treatment Works, immediately northwest of and adjacent to the eastern BESS area, the current main (and highest) building on the water treatment works site is approximately 10m in height to its ridge. This is currently the highest structure for some considerable radius. Assuming the 13.5m maximum height indicated on the plans will extend across the majority of the BESS area, the BESS area would be a major new element in the countryside, akin in scale to distribution warehousing. 5.88. Moreover, given the height parameter plans indicate that the height of development within the BESS area could be up to 13.5m, this would be a substantive impact on the view towards Lincoln Cathedral from viewpoint 2a. 5.89. The introduction of solar panels, the substation, and BESS into large, open agricultural fields will erode the area's openness and rural identity. The dark, solid appearance of the panels will be particularly noticeable from the A1133 and nearby public rights of way, creating a stark contrast with the existing landscape. 5.90. Viewpoint 24 looks northwards along the Trent Valley LCA. As the Landscape Character Assessment indicates (page 19) development on the low lying west of the A1133 would be prominent and not easily accommodated without detracting from the gentle transition to the open, flat farmland on the banks of the River Trent. WLDC is of the view that the proposal will create such a prominent development feature which would be clearly visible in the landscape. 5.91. WLDC questions why the project has not been designed to minimise these effects, especially given the visibility of the site from elevated public viewpoints. The council believes that alternative design choices could	The Applicant's assessment of impacts on visual receptors in specific viewpoints is considered at Appendix 11.4 [AS-046]. With regard to Viewpoint 2a, the Proposed Development would be experienced on the lower-lying land across different parts of the background whilst the silhouette of Lincoln Cathedral would remain discernible on the distant skyline. With regard to Viewpoint 4, the opaque screens are acknowledged as having a large presence in the view, but it should be noted that these will be a short-term solution and will be removed once positive management of the existing hedgerow allows for adequate screening.

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		have significantly reduced the visual and landscape impacts. 5.92. To address these concerns, WLDC recommends several mitigation measures: ▪ Increasing the setback of solar panels from the A1133 boundary. ▪ Relocating the substation and BESS further east, onto lower ground and closer to existing woodland, to reduce visibility. ▪ Enhancing the western site boundary with additional tree and hedgerow planting using native species such as maple, hawthorn, ash, and oak. This planting should be implemented through the Landscape Environmental Management Plan (LEMP) and ensure continuous screening, particularly near gaps like the layby south of the site entrance. 5.93. In conclusion, WLDC maintains that the OESF project, as currently designed, will cause significant and avoidable harm to the landscape character and visual amenity of the West Lindsey District. The council urges the applicant to revise the design and implement stronger mitigation measures in line with national and local policy requirements.	
WR56	West Lindsey District Council [REP1-099]	Agricultural land 5.94. WLDC strongly objects to the proposed loss of agricultural land—particularly Best and Most Versatile (BMV) land (classified as Grades 2 and 3a)—as part of the OESF solar farm development. The council argues that the scheme would result in the long-term removal of approximately 660.9 hectares of high-quality farmland from food production, which it considers a significant and adverse impact.	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

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		5.95. National Policy Statement (NPS) EN-3 advises that solar projects should avoid BMV land where possible, favouring lower-grade land. Similarly, Local Plan policies S14 and S67 reinforce the need to protect BMV land, only permitting its use when strict criteria are met. These include demonstrating a clear need for the development, proving that no suitable lower-grade land is available, and ensuring that the benefits of the proposal outweigh the loss of productive land. Additionally, any development should minimise disruption to ongoing agricultural operations and commit to restoring the land after the project ends. 5.96. WLDC contends that the OESF application fails to meet these requirements. The applicant has not sufficiently justified why BMV land must be used, particularly for infrastructure like the battery energy storage system (BESS), when lower-grade land is available nearby. The justification offered—primarily the national need for renewable energy and the project's 60-year "temporary" lifespan—is seen by WLDC as inadequate. The council argues that a 60-year period is effectively permanent in terms of agricultural impact, removing land from food production for multiple generations. 5.97. Furthermore, WLDC believes the project could have been designed more sensitively to avoid BMV land without compromising its contribution to national renewable energy targets. The council maintains that the current approach disregards both national and local planning policy and represents a missed opportunity to balance energy development with long-term food security and agricultural sustainability.	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. The Applicant can confirm that 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. 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

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			around." The Applicant will continue to discuss with the relevant landowners and provide an update during examination. 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*".
WR57	West Lindsey District Council [REP1-099]	Flood risk and the water environment 5.98. WLDC are concerned that the proposal within the administrative area falls into Flood Zone 3 in two major locations. The first location is the area between the River Trent and the Hall Water Reservoir. Although detailed information of what is proposed at this location have not been provided, it appears that this area will be used for the horizontal directional drilling to provide for the export cables to cross under the River Trent. 5.99. The second location where the project falls within Flood Zone 3 is east of the A1133. This area is east of	Item 5.98, 5.99 The Applicant confirms that this area is being considered for the trenchless crossing over the River Trent, which would potentially be horizontal directional drilling. The launch and receiving pits have been sited considerate of overall potential environmental impact. This consideration includes setback from the river banks, ability to cross under the River Trent with suitable clearance, but also minimising the length of the trenchless crossing. Minimising the length shortens the environmental impact from a soils, noise and contamination perspective, as well as cost. By having a shorter length

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		Southmoor Lane and extends either side of the Sewer Drain watercourse. 5.100. The proposed development is classed by the Government in Annex 3 of the NPPF as 'Essential Infrastructure' and development within Flood Zone 3 requires both the sequential test and, if the sequential test is met, then the exception test is required. 5.101. EN-1 makes clear at paragraph 5.8.7 that new energy infrastructure with flood risk areas should be exceptional: "Where new energy infrastructure is, exceptionally, necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall. It should also be designed and constructed to remain operational in times of flood."	trenchless length, the Applicant is able to be more flexible around programme for performing the trenchless crossing, and target periods of lower rain based on historic flood events (e.g. summer) to minimise impacts. The oCEMP will outline the controls to be put in place for working in this area, including how the applicant would mitigate potential flood risk.] Item 5.100 The Applicant has prepared further evidence to demonstrate how the Sequential Test has been applied and satisfied as part of site selection, arising from discussions during the ISH1 and within the Local Impact Reports. The Sequential Test Assessment [EN010159/APP/9.15] which has also been submitted at Deadline 2 demonstrates how it has considered reasonably available, lower risk sites that are appropriate for the Proposed Development and provided further evidence to justify the 10km search area. A sensitivity test has also been undertaken to extend this search area to 15km to address comments raised during the examination and in the Lincolnshire LIR. The additional evidence demonstrates that there are no reasonably available, lower risk sites that are appropriate for the Proposed Development in the extended search area. The assessment submitted at Deadline 2 then goes on to address compliance with the Exception Test. Item 5.101 With regards to the safety of the development, BESS and substations have been located outside of the design flood

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			risk extent which also ensures they will remain operational. The majority of panels have been raised to be above the design flood levels, again to remain operational. A small portion of the panels (equating to 3%) could be partially submerged in the design flood event and although these would be designed and constructed to remain operational, for safety and to be precautionary, these may be switched off should flood levels reach the base of the panels. 3% is considered to be a small proportion of the panel areas and will have a very low to negligible impact on energy generation during a 1 in 100 year flood event. 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 Climate change) is considered low and omitting panels in these areas for this low probability event is not considered proportionate or necessary. Furthermore, the structural design of the panel frames and inverter voided structures within the design flood extent has been undertaken. This indicates that the frame structures can and will be designed adequately to accommodate the likely velocity of flood flows and debris impact without failure. For clarity, the structural design presented represents the worst case design (in terms of flood depth, velocity and potential debris impact) however, at detailed design, area specific conditions and likelihood of debris impact will be considered so that efficient sizing of structural features can be undertaken. Note that this will also minimise impacts on flood storage volumes.

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			• 5.98 – check flood area and proposals here. • 5.99 – no response needed? • 5.100 to 5.102 – DWD response.
WR58	West Lindsey District Council [REP1-099]	Traffic and transport 5.107. WLDC raises significant concerns regarding the impacts of construction traffic on its communities and environment. 5.108. As discussed above, the cumulative impact of the addition of construction traffic generated by the OESF to the same highway network being used by four other NSIP solar projects will give rise to significant traffic management, delay and frustration over a period that could stretch between five and ten years. 5.109. WLDC considers the use of the 'Proposed Access Route 1' which begins at ABP Immingham, progresses on the A180/M180 onto the A15 south, and then to A46 at Lincoln and using the A57 to the site, to give rise to significant impacts. This is both in terms of the impacts cumulatively, and the impacts of the OESF individually in using local roads through the West Lindsey district to access the site in it south-western corner. 5.110. WLDC considers that the Scheme should use 'Proposed Access Route 2' as a route for construction traffic. Such an approach would utilise major motorway and A-class roads, minimising the use of local roads to access the site, 5.111. WLDC also question why the Scheme appears to propose on the Indicative Layout (EN010159/APP/2.9 rev	5.109: The Council may have confused the AIL access route which begins at Immingham, with the general construction route. The AIL route will only result in two movements of AIL traffic, the impact of which will be restricted to two individual days. 5.110: The Council may have confused the AIL access route Option 2 which only serves the transformer deliveries for the west area with general construction. This route is not suitable for all loads. 5.111: The southern access is an emergency access and is not used for construction access. The updated Transport Assessment **[REP1-045]** provides further details for this access. 5.114: Passing HGV traffic is available with a 6m width The Applicant notes that Lincolnshire County Council as local highways authority does not share any of the concerns noted by the District Council.

Internal Ref	WR	Summary	Applicant Response
		1) two construction access points in close proximity to each other from the A1133 into the eastern part of the site. There does not appear to be a compelling reason to remove hedgerows forming the field boundary to create this access. The use of a single access would minimise the environmental harm caused and WLDC would welcome such an amendment to the OESF project. The Transport Assessment (Appendix 12.2 EN010159-000179-6.21) identifies the northernmost access as “Gate F”, but the access immediately adjacent the Anglian Water Works is not shown. WLDC considers this needs to be clarified. 5.112. Figure 2.1 of the Outline Construction Traffic Management Plan [APP-181] and figure 4 of Environmental Statement Appendix 12.2 Transport Assessment [APP-136] contain the same figure, showing a construction access ‘Gate G’ running westwards from the A1133, north of the Anglian Water reservoir. The DCO limits are tightly drawn here to include just the existing single-track access and a small verge, which is approximately 6m in width, from the boundary fence for the Anglian Water reservoir, to the field boundary hedge. 5.113. Gate G is the only access to works east of the River Trent and west of the A1133. These works include the installation of 13 hectares of solar panels and the horizontal directional drilling for the export cable to run under the River Trent. The application documents do not appear to have specified the expected vehicle numbers using this access. However the access is directly on to a main A class road, which has a national speed limit of 60 miles per hour. 5.114. The Gate G access is directly opposite the existing access for the Anglian Water Hall Water Treatment	

Internal Ref	WR	Summary	Applicant Response
		Works. Given a maximum 6 metre width without removing the field boundary hedgerow there does not appear to be enough width for two large goods vehicles to pass each other on the access road. This has the potential, if a large goods vehicle is leaving the site, for the need to an incoming vehicle to need to wait on the carriageway of the single carriageway A class road with a 60 miles per hour national speed limit for the vehicle to exit. 5.115. The transport assessment indicates in Table 5 that HGV traffic on the A1133 north of north Clifton will increase during the project construction phase by 9.9%. 5.116. It should also be noted that, although the road appears generally level, there is in fact a significant dip in the road with the dip reaching its nadir around Gate G. This dip obscures the view from traffic approaching from the south. There is also a right-hand bend in the road approximately 350m north of Gate G which also has the potential to obscure traffic waiting on the A1133 in the vicinity of Gate G. Additionally southbound traffic will have passed Gate F immediately to the north of this bend. 5.117. WL Local Plan Policy S47 states that any development that has severe transport implications will not be granted planning permission unless deliverable mitigation measures have been identified, and arrangements secured for their implementation, which will make the development acceptable in transport terms. 5.118. DC requests that further consideration is given to the road safety aspects associated with Gate G, and its location on the A1133, opposite the existing Anglian Water Treatment Works access, on a road subject to the national speed limit.	

Internal Ref	WR	Summary	Applicant Response
WR59	West Lindsey District Council [REP1-099]	Tourism 5.119. WLDC identifies significant potential impacts on the tourism sector within the district as a consequence of the scheme. WLDC considers that there will be a long-term impact on tourism as a result of the Scheme during the construction phase. 5.120. The visitor economy is a significant and growing sector within West Lindsey. The area is an attractive, peaceful rural area which combines an outstanding natural environment with historic villages in close proximity to the City of Lincoln. Lincolnshire's visitor economy is worth £2.4bn (STEAM data Lincolnshire County Council), with the sector supporting 30,000 jobs and a far-reaching supply chain across the county. Food and drink spending alone generates £44m into the local economy, with recreation adding £18m and retail contributing £59m. The visitor economy is a significant sector for people's livelihoods. 5.121. The impact of Covid lockdowns has been severe. Lincolnshire has experienced a 52% reduction in all tourism spending (STEAM data 2020), with full time jobs being reduced by half from 2,500 jobs to just over 1,200. There has been a 52% reduction in visitor numbers and a 50% reduction on the number of visitor days. Food and drink spend feel from £44m to £21m (reduction of £13m) and retail spend fell from £59m to £29m 9a reduction of £20m). Recreational spend reduced by £10m to £8m. Overall, local tourism businesses have experienced a reduction of over £100m from their revenue.WLDC Written Representations - One Earth Solar Farm Page 25 of 36 5.122. Reflective of the defining agricultural character and culture of West Lindsey, one of the key tourist events is the Lincolnshire Show, held annually at the Lincolnshire	In regard to the potential for long term impacts to tourism as a result of the Scheme during the construction phase, it should be highlighted that the two-year construction period would limit the scale of any potential effects. The Applicant assessed effects upon tourism/the visitor economy in the local area (during construction, operation and decommissioning) through reviewing existing facilities, local data on employment in relevant sectors, the proximity and nature of works, as well as effects and mitigation identified in assessments such as Noise, LVIA. It should be recognised that whilst effects on tourism are uncertain – given they reflect individual decision making on when and where to visit, there will be a sizeable increase in construction employment (554-750) on site. Though there is some uncertainty on the level of increase, on balance this would offset any adverse effects given that there would be expenditure from these employees depending on where the employees live. The Applicant acknowledges that the visitor economy is an important sector for the local area and furthermore understands that the Lincolnshire Show is a key event. The Study Area for the assessment of impacts to tourism was identified as the local area which comprises four Lower-Layer Super Output Areas (LSOA) that the Order Limits intersects. The Lincolnshire Showground was therefore located outside of the Study Area. In regard to potential operational effects upon tourism, The Applicant has considered a 2013 Cornwall Study which provides some data on the relationship between tourism and solar farms. This data shows that the majority of visitors were

Internal Ref	WR	Summary	Applicant Response
		Showground. The show is a flagship event for the area, with over 60,000 visitors and 500 exhibitors each year. The success of the Lincolnshire Show is strongly reliant upon the local tourism sector accommodating the visitor demand it creates. 5.123. Forecasts have predicted that it will take a timescale of up to 2025/26 for businesses in the sector to recover to pre-Covid levels, based on the assumption that no material externalities will compromise this recovery. 5.124. The influx of construction workers will materially decrease the availability of tourist accommodation, which will be further exacerbated on a cumulative basis with other DCO solar projects within West Lindsey. 5.125. The significant reduction in the availability of tourist accommodation will, in WLDC's view, result in visitors seeking accommodation in different parts of the region, which will have a direct and indirect effect on tourism in the district. 5.126. Once the construction period for all projects is complete (which will occur for a number of years), there is no certainty that the tourism sector will recover to its former level and, if so, how long this would take. 5.127. The OESF project will have a significant negative impact on the local tourism sector, causing damage to its image and recovery.	unaware of the presence of solar farms, and their decision to visit would not have been influenced by their presence. 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. While this study is not directly comparable to the Proposed Development, the data does indicate that the presence of solar infrastructure similar does not significantly affect tourism demand. The various mitigation measures set out in the ES alongside the potential temporary demand for services from construction workers would be expected to mitigate potential impacts to tourism.
WR60	West Lindsey District Council [REP1-099]	Cultural heritage 5.128. The Royal Observer Corps Roman Fort Scheduled Monument (List Entry Number 1003608) is located to the west of the OESF Order Limits. The Scheduled Monument is a 1st century Roman vexillation fortress sitting upon the ridge to the east of the River Trent. To the south lies the remains of two Romand	The Applicant has responded to representations on the Royal Observer Corps Roman Fort Scheduled Monument in Deadline 1 at RR.032 within 'Applicants Response to Relevant Representations' (p.132) [EN010159.9.3 - REP1.075]. It is noted that the Applicant's conclusions are not contended but additional information is requested. The Applicant has already provided the additional view requested

Internal Ref	WR	Summary	Applicant Response
		marching camps and, immediately to the north, lies a Royal Observer Corps Monitoring Post. The purpose of the designation is due to the importance of 5.129. The monument is designated for the following reasons: Period: the fortress and camps date from the 1st century AD, during the military conquest of Britannia by the Roman Army, and are highly representative of this initial phase of the Roman conquest and occupation of Britain; Rarity: Vexillation fortresses form a rare subset of Roman defensive sites; Survival: Three sides of the fortress survive, complete with outworks and internal features. The two camps survive as the northern arm of the defensive circuit; Potential: The fortress and camps remain unexcavated and contain considerable potential to inform on the nature of the Roman Army in the early days of the occupation of Britannia. 5.130. The Infrastructure Planning (Decisions) Regulations 2010 requires decision makers to have regard to the desirability of preserving the setting of a scheduled monument. 5.131. Section 5.9 of NPS EN-1 recognises that the construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment. The historic environment incudes all aspects of the environment resulting from the interactions between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, landscapes and planted or managed fauna.	at Figure 10.7 [APP.075]. This was also confirmed in the 'Applicants Response to Relevant Representations' (p.383) [EN010159.9.3 - REP1.056].

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		5.132. NPS EN-1 requires Applicants to fully assess the significance of heritage assets affected by a proposed development and ensure that the extent of the impact can be adequately understood from the application and its supporting documents (para. 5.9.12). 5.133. In decision making, NPS EN-1 states that the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by a proposed development, including development affecting the setting of a heritage asset (para. 5.9.22).In considering the impact of a proposed development on any heritage asset, the Secretary of State should give considerable important and weight to the desirability of preserving all heritage assets, with any harm or loss of significance requiring clear and convincing justification (para. 5.9.28. 5.134. Where substantial harm (or total loss of significance of) a designated heritage asset (including scheduled monuments), the Secretary of State should refuse consent unless it can be demonstrated that the substation harm to, or loss of, significance is necessary to achieve substation public benefits that harm or loss (para. 5.9.31) 5.135. Where a proposed development will lead to less than substantial harm to the significant of the designated heritage asset, this harm should be weighed against the public benefits of the proposal (para. 5.9.31) 5.136. NPS EN-3 provides specific policy relating to the impacts of solar PV generation project on the historic environment (Section 2.10). Key policy stated includes: ▪ Solar PV development on the historic environment will require expert assessment in most cases and may have effect both above and below ground (para. 2.10.107);	

Internal Ref	WR	Summary	Applicant Response
		▪ As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which, depending on their scale, design and prominence, may cause substantial harm to the significance of the asset (para. 2.10.118). 5.137. CLLP Policy S57 requires development to protect, conserve and seek opportunities to enhance the historic environment. In instances where a development proposal would affect the significance of a heritage asset (both designated or non-designated), including any contribution made by its setting, the applicant will be required to describe and assess the significance of the asset, including its setting; identify the impact of the proposed works on the significance and special character of the asset, including its setting; and provide a clear justification for the works so that the harm can be weighed against public benefits. 5.138. The applicant has carried out an assessment of the impact of the Scheme on the Scheduled Monument. The assessment concludes that there would be a very low magnitude of impacts to the wider setting of the Scheduled Monument, which is a minor neutral effect (not significant) in the short and medium term. This conclusion is reached due to the assessment view that the solar arrays would be low-lying and the strategic role of the asset in the landscape would remain. 5.139. Notwithstanding the conclusions of the applicant's assessment, the OESF would be readily visible from the asset, which would have an adverse impact upon the view outwards to the east. This will include solar panels and potentially the substation and BESS.	

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		5.140. Due to the historic function of the asset, its relationship with the surrounding landscape is considered to be an important part of its setting. To assist with understanding the impact in this regard, it is considered that an additional viewpoint should be provided from the observer corps. post, as it represents designated viewpoint that utilises the same topography as the fort, contributing to its significance. This view has also been expressed by Historic England. 5.141. Whilst there the conclusions reached by the applicant are not contended at this stage, the submission of this further information would enable a robust assessment to be made against relevant policy to determine the acceptability of the Scheme's impacts on the Scheduled Monument	
WR61	West Lindsey District Council [REP1-099]	Maintenance, replacement and decommissioning 5.142. It is not clear to WLDC how the replacement of infrastructure (project components) has been accounted for in the assessment. The assessment does not justify or reason the degradation rates or whether degradation could be accelerated by climate change. 5.143. Being unable to identify the likely failure rate of panels and the requirement to replace BESS and substation infrastructure during the lifespan of the consent, leaves the potential likely impacts during the operational phase unclear. 5.144. The wide scope of the definition of 'maintenance' in the dDCO has the effect of allowing a developer to replace a whole NSIP project over its lifespan. The application states that panels, BESS and other associated development will need to be replaced at least once during the project, which have the potential for significant	With respect to paragraph 5.142, the Applicant has considered equipment that has been designed to operate across the climate change scenarios assessed. This includes key equipment such as panels, transformers and BESS units. Degradation rates consider these effects typically, as they are part of the requirement for technology to be compliant with project requirements. During detailed design, this will be re-confirmed with OEMs. With respect to paragraph 5.143, the Applicant has provided a typical lifespan of components in Table 5.5, Chapter 5: Description of the Proposed Development [APP-6.5]. This corresponds to lifespans currently seen in industry, and has been considered where appropriate in the Applicants assessments. As in the below point, the Applicant is also committed to providing an annual planned maintenance schedule.

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		adverse environmental effects. This will be exacerbated when the need to re-place and re-construct applies to all four NSIPs cumulatively. 5.145. WLDC note that in the Solar Road Map (2025) the Government commits to "hold a roundtable bringing together academia, the solar industry, waste sector and relevant government departments and organisations to gain a greater understanding of the decommissioning dates for current UK solar panels and likely availability of current conventional and emerging innovative solar panel recycling practices". However, the OESF development likely to undertake replacement of equipment on a cycle that predates substantive action by Government. Therefore, the issues associated with recycling need to be considered as part of the consideration of this application. 5.146. There remains 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. The application is unclear in providing details on the approach to managing waste from 'maintenance' activities. 5.147. The current proposals for decommissioning include the retention in the ground of the majority of the export cables. WLDC requests further information on the assessment of the environmental effects of cable retention in perpetuity, including the deposition and migration of microplastics. 5.148. Local Plan Policy S10 states that proposals will be supported where they demonstrate their compatibility with, or the furthering of, a strong circular economy in the local area (which could include cross-border activity elsewhere	With respect to para 5.144, the Applicant has responded in detail at Deadline 1 in relation to the definition of "maintenance" in the draft DCO (see **Applicant's Responses to Relevant Representations [REP1-075],** ref RR.032 on page 105). Additionally, at Deadline 2, the Applicant has updated the outline OEMP to insert a new section which includes a commitment to provide an annual planning maintenance schedule. This would require the Applicant to report to the relevant planning authorities on its expected activities in the upcoming twelve months, including waste generation, transport requirements, and details of any trees that require removal and if they are proposed to be replaced. The schedule would also confirm that the environmental effects that are likely to arise as a result of the proposed maintenance and the environmental controls to be implemented are not materially worse than those reported in the ES. This provides a further check on the scope of the maintenance power, and a "mechanism" as referenced by WLDC in paragraph 5.146. With respect to paragraph 5.145, Action 70 of the Solar roadmap's Appendix 1: Action table (Published 30 June 2025), this group will respond to developments concerns and pace of recycling capacity development to be aligned to projects. The Applicant does not feel that there is an undue risk here, and has also assessed waste effects through Outline Site Waste Management Plan and Materials and Waste Impact Assessment. With respect to paragraph 5.146, as in the response to 5.144 the Applicant is proposing a process to notify local authorities

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		in Lincolnshire) will be supported. It is not considered that this proposal does that at present.	of potential waste arisings to allow more oversight and support planning processes. With respect to paragraph 5.147, the Applicant has provided a response to this query in RR.132, Applicant's Responses to Relevant Representations [APP9.3] With respect to paragraph 5.148, this has been considered throughout the design of the Proposed Development. Sourcing of materials from recycled or reused sources and use of low carbon materials, sustainable sources and local suppliers are set out within the Outline Construction Environmental Management Plan (CEMP) and OSWMP.
WR62	West Lindsey District Council [REP1-099]	BESS & fire safety 5.149. WLDC acknowledges the Outline Battery Safety Management Plan [APP-183] submitted as part of the application to identify the fire safety risks associated with the BESS and to explain the measures proposed to mitigate those risks. 5.150. WLDC maintains concerns regarding the risk of fire from BESS infrastructure and the effectiveness of processes to ensure that events are avoided and/or dealt with in a manner that provides a high level of protection to communities and the environment. 5.151. WLDC expects the applicant to work closely with Lincolnshire Fire and Rescue Service to provide all necessary information regarding the installation of the Scheme, including site design features, to facilitate hazard and risk analysis studies. Such engagement should also ensure that comprehensive risk management and emergency response plans are developed, to be achieved	Regarding 5.150 and 5.151, the Applicant is in contact with Lincolnshire and Nottinghamshire FRS, and is collaborating on refining the outline Battery Safety Management Plan, with the principals of the approach being drafted into the Statement of Common Ground. Regarding 5.152 and also as noted in the Applicant's response to WR67 below, R7 (battery safety management) has now been updated to include the relevant district authority as a consultee.

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		through the sharing of detailed site designs at as early a stage as possible. 5.152. Due to the importance of this risk to the communities and environment in the district, WLDC requests that it is included as a consultee body in the approval of the dDCO requirement number 7 'Battery safety management plan'.	
WR63	West Lindsey District Council [REP1-099]	WLDC Values 5.153. WLDCs 'Vision', established through its Corporate Plan 2023-2027, is "West Lindsey is a great place to be where people, businesses and communities can thrive and reach their full potential". The WLDC 'vision' is to be achieved through the implementation of 'Core Values', which includes 'To have integrity in everything we do'. 5.154. The above 'vision' and 'values' apply to all WLDC activities and responsibilities, including planning related duties. With regard to its role as a relevant Local Authority for the examination and determination of the OESF project, WLDC wishes to ensure that the proposed development, if consented, would be constructed, operated and decommissioned in a manner that satisfies those values. 5.155. WLDC would welcome confirmation from the applicant, OESF, that all aspects of the project, including organisation values, use of human resources, supply chain management and approach to engagement with local communities will be governed by appropriate values and ethics.	The Applicant understands that there is concern about where the solar panels could be produced and wants to be very clear, that wherever the panels are sourced, the Applicant opposes the abuse of human rights and forced labour anywhere in the global supply chain. The procurement process for the Proposed Development has not yet started and would begin should development consent be granted. As part of this process, the Applicant would take a rigorous approach to ensuring its suppliers comply with relevant legislation (such as the Modern Slavery Act 2015) and its requirements as set out in an ethical procurement policy, in its Outline Employment, Skills and Supply Chain Plan. The Applicant's suppliers of solar panels are subject to a rigorous compliance screening and certification process. The Applicant, and Orsted in particular, has established a Responsible Business Partner Programme (RPP), building on its general human rights due diligence approach to collaborate with suppliers and business partners on improving their adherence to the Applicant's 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.

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			The Applicant has also signed up to Solar Energy UK's statement on ethical procurement which applies the highest possible levels of transparency and sustainability.
WR64	West Lindsey District Council [REP1-099]	Community benefits 5.156. WLDC note that the Solar Road Map published by the government in June 2025 indicates that the government is proposing to make it mandatory for developers of low carbon infrastructure (including solar) to provide community benefit funds. A consultation was held in May and June 2025 relating to this. WLDC also note that Solar Energy UK will publish a Community Benefits Protocol. Despite this, WLDC is concerned that there appears to be scant information on the developer website or within their documents which allude to any direct community benefits. In this context WLDC wishes to ensure that a community benefit fund is established for the OESF, and that the fund is distributed proportionally between the relevant communities, with particular regard to the cumulative effects of the OESF and other solar NSIP projects in the WLDC area.	The Applicant is aware of the consultation that recently closed on a mandatory community benefit, and will comply with any future requirements. In the meantime, the Applicant has committed to developing a community benefit package that will bring meaningful benefits to the local community, developed through consultation with residents and other stakeholders if the project is consented. The Applicant has already made an initial fund available, which is already providing local benefits. Furthermore, the Applicant has committed to using local labour when possible, for the construction, operation and decommissioning stages, and working with local authorities and other educational institutions to help support a local labour force.
WR65	West Lindsey District Council [REP1-099]	Grid Connection 5.157. WLDC note that the connection to the national grid at High Marnham does not form part of the NSIP and is to be the subject of a separate planning application by National Grid Electricity Transmission to be submitted later in 2025. WLDC are concerned that there is the possibility that the OESF will be granted a DCO whilst the grid connection is yet to be consented. To that end WLDC request a 'Grampian style' Requirement is added to the OESF DCO such that the OESF DCO cannot be	This issue was raised and discussed at Issue Specific Hearing 1 and the Applicant was asked to comment on the inclusion of a Grampian style requirement in the DCO. The Applicant strongly disagrees that there is any justification for imposing such a requirement, and its reasoning in this respect is set out in the Applicant's **Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-077]** at Agenda Item 6(i), in particular at pages 25 – 27.

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		implemented until the planning permission for the grid connection has been granted.	
WR66	West Lindsey District Council [REP1-099]	Operational land and permitted development 5.158. With reference to action point 4 on the Actions arising from the ISH1 held on the 9 July 2025, WLDC does not consider that the article of the DCO which grants 'operational land' status to the full extent of the development included in the DCO for the duration of the 60 year life of the project (article 38) is necessary or justified. There is no justification for this definition to encompass any land identified for Work 8 - works to create, enhance and maintain green infrastructure and mitigation. 5.159. WLDC also considers that operational land status is not appropriate for land outwith land used for the solar panel, substation or BESS. This is because, once complete, the export cable will be underground and without any above ground infrastructure. Current permitted development rights for electricity undertakers (Class B of Part 15 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015) include erection of plant and machinery up to 15 metres in height. This would allow the expansion of the OSEF into other areas within the DCO boundary with no further recourse to the local planning authorities. WLDC do not consider this to be appropriate in otherwise open land.	The Applicant has set out its position on this point in the Applicant's **Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 [REP1-077],** Agenda Item 4, page 9 and the Applicant reiterates its position as set out and strongly maintains that position. To the Applicant's knowledge, the Article proposed has been included in all solar DCOs made to date, and the Applicant is not aware of WLDC taking any issue with this Article on any other solar DCOs located in its area.
WR67	West Lindsey District Council [REP1-099]	6. Requirements 6.1. The dDCO [APP-007] defines WLDC as a 'relevant planning authority' for the purpose of approving the following DCO 'Requirements':	In response to the comment, the Applicant has updated the draft DCO at Deadline 2 as follows:

Internal Ref	WR	Summary	Applicant Response
		i. Requirement 3 – phasing of the authorised development and date of final decommissioning); ii. Requirement 4 – requirement for written approval iii. Requirement 5 – detailed design approval iv. Requirement 6 – community liaison group v. Requirement 8 – landscape and ecology management plan vi. Requirement 9 – biodiversity net gain vii. Requirement 10 – fencing and other means of enclosure viii. Requirement 13 – construction environmental management plan ix. Requirement 14 – operational environmental management plan x. Requirement 16 – operational noise xi. Requirement 17 – skills, supply chain and employment xii. Requirement 20 – decommissioning and restoration xiii. Requirement 21 – ground conditions 6.2. The 'Requirements' that are not specified for approval by WLDC are (to be approved by Lincolnshire County Council and Nottinghamshire County Council: i. Requirement 7 – battery safety management plan ii. Requirement 11 – surface water drainage iii. Requirement 12 – archaeology WLDC Written Representations - One Earth Solar Farm Page 30 of 36 iv. Requirement 15 – construction traffic management plan v. Requirement 18 – public rights of way management plan vi. Requirement 19 – soil management plan	- R7 (battery safety management) – to include the relevant district authority as a consultee; and - R15 (construction traffic management plan) – to include the relevant district authority as consultee. In relation to the mechanism to require early decommissioning, the Applicant has inserted into the **outline OEMP at Deadline 1 [REP1-049]**, a new section 2.13 entitled "In the event of Period of Extended Outage" to address this point. With respect to the comment at paragraph 6.6, the ten weeks is intended to align with the timeframe included in Schedule 15. If the relevant planning authorities did not consider that the DEMP submitted for approval at that time should be approved, they can refuse it and similarly they can ask for a longer period of time in which to determine the application. Requirement 20(5) provides that no decommissioning works may be carried out until the relevant planning authority has approved the DEMP. So if there is a delay for whatever reason, meaning the DEMP takes longer than ten weeks to be approved, there is a lock in place so that the Applicant cannot start decommissioning without the DEMP being approved. In practice, the Applicant would likely to have engaged with the relevant planning authority and other consultees ahead of submitting the DEMP for approval and may well submit it earlier than ten weeks, in order to build in some contingency for delays – Requirement 20(3) simply provides a back stop of "no later than ten weeks".

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		6.3. WLDC agrees with the above responsibilities for the approval of DCO 'Requirements', however the Council would additionally wish to be consulted on the following as matters that have impacts on the communities of West Lindsey: i. Requirement 7 – battery safety management plan ii. Requirement 15 – construction traffic management plan. 6.4. Requirement 20 of the dDCO [APP-007] currently lacks a mechanism to require decommissioning if the project ceases to generate energy prior. Given that, in this scenario, the harms would remain without the benefits of the project we request a mechanism is added to ensure decommissioning will occur, should generation cease prior to 60 years following final commissioning. We would draw the Examining Authority's attention to the DCO Requirement numbered 64 in Part 2 of Schedule 1 (page 64) of the Oaklands Farm Solar Park Order 2025 which was made by the Secretary of State on 19th June 2025. In particular sub paragraph (4) of the DCO Requirement which states: (4) The undertaker must provide notice to the local planning authority once any part of the authorised development stops generating electricity for more than 6 months. If, by expiry of the period of 12 continuous months beginning with the date of the notice, and unless otherwise agreed in writing by the undertaker and the relevant local planning authority, that part of the authorised development does not re-generate electricity, then within 3 months the undertaker must submit to the local planning authority for that part (or both local planning authorities where that part falls within the administrative	Note, at Deadline 2 the timeframe in Schedule 15 has been changed to twelve weeks and a consequential amendment also made to the period in this Requirement so that it is also twelve weeks, and the comments made here still apply.

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		areas of both South Derbyshire District Council and Derbyshire County Council) for approval a decommissioning environmental management plan and a decommissioning traffic management plan for that part. 6.5. WLDC consider that a similar DCO Requirement would be appropriate for the One Earth Solar Farm. 6.6. WLDC also notes that, under sub paragraph (3) of Requirement 20, the OESF dDCO [APP-007] that the applicant commits to submitting a decommissioning environmental management plan to the local planning authority “no later than ten weeks prior to the intended date of decommissioning”. However, 10 weeks is the determination period set out in article 45 the local planning authorities to determine applications for discharge of DCO Requirements. Notwithstanding WLDC’s comments in the next section on article 45, WLDC considers submitting the application to discharge the requirement for a decommissioning environmental management plan just 10 weeks before start of decommissioning is not appropriate, particularly as the DCO does not require any preapplication consultation and article 45 is drafted such that an application is deemed to have been approved after the expiry of the appropriate time period. 6.7. WLDC would suggest that submission three months before decommissioning is due to start would give an appropriate period for any issues arising to be raised and considered,and the application determined in advance of decommissioning commencing Schedule 15 - Article 45: Procedure for discharge of requirements	
WR68	West Lindsey District Council [REP1-099]	6.8. WLDC is in the position of potentially being responsible for the approval of DCO requirements relating	The Applicant has set out its position on this point at ISH1 as recorded in the **Written Summary of Applicant’s Oral**

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		to five solar NSIP projects, which all may feasibly be seeking such approvals on similar timescales. 6.9. The likely volume, technical complexity and requirement to consult external bodies will place considerable time pressures on WLDC to assess important details that will affect the communities and environment of the district for over half a century. 6.10. This matter was considered by the Secretary of State previously in the Cottam decision in which he stated (paragraph 4.110): "The Secretary of State has carefully considered the suggested discharge periods and concluded that a compromise of 13 weeks would be most appropriate to account for the number of applications coming forward in Lincolnshire, whilst seeking to avoid delays to the progress of the Proposed Development." Furthermore, to the recognition that there will be multiple solar NSIP developments submitting requirement discharges within a similar time period to the same authorities, the OESF project adds the additional complexity of taking place across multiple district and county authorities, where it would be in all parties' interests to allow the authorities to collaborate. To that end, it is considered that more time is required, and 13 weeks should be considered as a minimum. 6.11. In light of these pressures, and with reference to action point 4 on the Actions arising from the ISH1 held on the 9 July 2025, WLDC wishes to see the following amendments to Schedule 15 of the dDCO [APP-007]: ▪ That WLDC must give notice to the undertaker (applicant) if its decision on the application within a period of 13 weeks beginning with the later of	**Submissions at the Issue Specific Hearing 1 [REP1-077]** in relation to Article 45 starting on page 12 of that document. The Applicant does, however, appreciate the points raised by the Council and at Deadline 2 has extended the time from ten to twelve weeks. The Applicant does not agree that the time allowed should be any longer than this, for the reasons previously set out in support of the ten week period. The Applicant has also made consequential amendments to the time periods in Article 45 and Requirement 20 (Decommissioning and restoration).

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		a) The day immediately following that on which the application is received by the authority; b) The day immediately following that on which further information has been supplied by the undertaker under paragraph 3 (of Schedule 15); or c) Such longer period that is agreed in writing by the undertaker and the relevant planning authority 6.12. The increase in this time period from 10 to 13 weeks is considered proportionate to enable WLDC to carry-out its duties in the public interest.	
WR68A	West Lindsey District Council [REP1-099]	7. Planning balance 7.1. The application falls to be determined in accordance with section 104 of the PA2008. 7.2. WLDC raises significant objections to the project; key issues being the cumulative impact on the landscape and visual amenity and construction impacts, and the impact of the project in solus on landscape character and visual effects. 7.3. WLDC recognises that the Scheme would help meet a national need for additional electricity generating capacity, and this accords with the UK's energy policy to decarbonise electricity generation and deliver security of supply. 7.4. The cumulative circumstances of this proposal being determined alongside three other NSIP solar projects results in unprecedented cumulative impacts in construction, operation and decommissioning. 7.5. WLDC concludes that that proposal fails to accord with the relevant NPSs, the NPPF, the adopted Local Plan and adopted Neighbourhood Plans with regard to its cumulative impacts and the impact on landscape character and visual effects/amenity.	The Applicant notes WLDC's objections to the Proposed Development from a landscape and visual perspective. It is however the Applicant's firm view is that it has avoided or minimised visual impacts as far as practicable while still meeting the needs of the Proposed Development, consistent with National and Local Policy. That policy direction does not require the complete avoidance of all adverse effects, and NPS EN-1 at 3.2.1 expressly contemplates that it is not possible to develop the necessary amounts of renewable energy infrastructure without some residual adverse effects. Paragraph 5.10.5 also recognises that virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape. In terms of cumulative impacts, the Applicant has followed the process outlined in PINS Advice Note 17, and the long list (Stage 1) of other projects was agreed with the Local Planning Authorities early in the process, and additional projects were added at their request. The Applicant then followed the process in compliance with policy, preparing a short list, gathering information on each of the developments

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		7.6. WLDC consequently objects to the OESF project and invites the SoS to refuse development consent.	and then undertook a detailed assessment of the cumulative effects of the other developments identified. This is also in compliance with National and Local Planning Policy, namely NPS EN-1 which specifies a range of aspects for which the applicant's assessment in the Environmental Statement should consider cumulative impacts, as relevant to the development. Paragraph 4.1.5 of EN-1 states that the Secretary of State should take any long-term and cumulative adverse impacts, along with any measures to mitigate or compensate for adverse impacts, when weighing the adverse effects of a project against its benefits. As explained during Issue Specific Hearing 1 (ISH1) and detailed within the Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-077], the cumulative impacts with other NSIP developments has been considered within the DCO examinations for Cottam, West Burton, Gate Burton and Tillbridge, which all found there to be no potential for significant cumulative effects with One Earth Solar Farm. The Joint Interrelationships Report from the Tillbridge Examination has been submitted to the One Earth Examination Library at Deadline 1 and is found at Appendix D of the Written Summary of Applicant's Oral Submissions at the ISH1 (REP1-077) as well as the Technical Note on Cumulative Effects of Additional Schemes that was submitted to the Cottam Solar Project Examination which is found at Appendix E of the Written Summary of Applicant's Oral Submissions at the ISH1 (REP1-077). In addition, the Applicant has also submitted an Interrelationships Report in relation to One Earth Solar Farm, submitted at Deadline 1 [REP1-074] which considers the cumulative effects of the nearest NSIP solar schemes located within 16km of the Proposed Development. This includes Cottam Solar Project,

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			Gate Burton Energy Park, Great North Road Solar and Biodiversity Park, West Burton Solar Project, Fosse Green Energy, Tillbridge Solar, Steeples Renewables Project. The Applicant is committed to working with other developers to reduce potential cumulative impacts. The Applicant has included a commitment to seek opportunities to work with other schemes, especially should there be any temporal construction overlaps via the outline Construction and Environmental Management Plan (oCEMP) [REP1-048] and the outline Construction Traffic Management Plan [REP-1-055]. It is therefore considered by the Applicant that the Proposed Development does on balance accord with the relevant National and Local Planning Policy.
WR69	Environment Agency [REP1-103]	The key issues we see as unresolved are highlighted below in our Work Package Tracker, Appendix 2, we are in regular consultation with the applicant to work through these points but yet to confirm our position to address these issues within a Statement of Common Ground.	As set out by the EA, the Applicant is in consultation with the EA and are in the process of agreeing the SoCG.
WR05	Marine Management Organisation [REP1-105]	4.2. The MMO has powers under the Infrastructure Planning (Fees) Regulations 2010 (as amended) to charge for its services in relation to any advice, information or other assistance (including a response to a consultation) provided in connection with: • an application or proposed application, for an order granting development consent, and • an application/proposed application to make a change to, or revoke, such an order, and	In deciding whether to further consult with the MMO beyond the statutory consultation undertaken, the Applicant has had regard to (1) the MMO's clear position taken in the examination of the applications for solar NSIPs, Cottam, Gate Burton, West Burton and Tillbridge, which all seek consent for cables underneath the River Trent; and (2) in light of the clear position of the MMO and the directly comparable nature of the One Earth proposals to the four other matters cited in terms of the crossing of the River

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		• any other prescribed matter relating to NSIPs, including both statutory and nonstatutory work. 4.3.MMO has contacted the One Earth Solar Farm Limited to request an 'enquiry' be submitted on our online Marine Case Management System (MCMS) - https://marinelicensing.marinemanagement.org.uk/mmofox5/fox/live/MMO_LOGIN/login 4.4. This is to allow MMO to issue an estimate for review of the Examination documents, which may include scientific advice from the Centre for Environment, Fisheries and Aquaculture Science (Cefas), and to provide formal advice on potential marine licence requirements under the Marine and Coastal Access Act 2009. That estimate must be accepted before MMO are able to proceed with any review. To date this action has not been taken which means we are currently unable to provide a detailed response to deadline 1. A generic high level scoping opinion often applied to large scale projects is attached to this letter. It may be that no elements of the project fall within MMO jurisdiction under MCAA 2009, however we are unable to confirm this until an enquiry is submitted and an estimate is agreed. There is a risk that without formal advice from the MMO, the project is at potential risk of enforcement action should it proceed with activities within MMO jurisdiction (the marine environment in English waters) without the appropriate approvals.	Trent, the desire to seek to avoid placing a greater administrative burden on the MMO's resources unnecessarily. The Cottam, Gate Burton, West Burton and Tillbridge schemes included high voltage cables under the River Trent to connect the solar generating station to the relevant National Grid substation in each case. In each case trenchless methods are to be used for the crossing, In the case of One Earth, trenchless crossing methods are proposed for the River Trent, the launch and exit pits are within the floodplain, but controlling processes have been considered to manage any equipment in this region during the case of a high rainfall or flooding event in the oCEMP [REP1-047]. The launch and receiving pits (and associated compounds) will be a minimum of 16m from the toe of the flood defence barriers. The cable route crossing of the River Trent will be a minimum of 5m below the bed of the river. The trenchless crossing compounds for the cable across the River Trent will be located as far as is reasonably practicable, and not within 100m of noise sensitive receptors. The MMO's position has been the same for all four of these applications. For example, extracts below are included from its submissions made to the examination on the Cottam Solar Project: "*The MMO is of the opinion that the activities works for Cottam Solar Project that fall within mean high water springs, and are therefore considered licensable by the applicant, consist of a bored tunnel. The MMO, however, consider this*
WR06	Marine Management Organisation [REP1-105]	It is the applicant's responsibility to identify any marine licensable activities that will be undertaken and to apply for a deemed Marine Licence as part of this DCO application. Alternatively, the applicant can apply for a separate marine licence consent directly from the MMO.	

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		MMO request further engagement on this matter at your earliest convenience.	*to be exempt following Article 35 of the 2011 Exempted Activities Order where it states, 'Article 4 applies to a deposit of works activity carried on wholly under the sea bed in connection with the construction or operation of a bored tunnel'.* *In addition, alongside the trenchless crossing within your order it says the activities will also be: laying down of internal access tracks, ramps, means of access, footpaths, crossing of watercourses, roads, including the laying and construction of drainage infrastructure, signage and information boards; and construction compounds, including site and welfare offices and areas to store materials and equipment. It is unclear from this wording what exactly you consider a licensable marine activity as a number of these would not be considered by us to be so.* *We note that deadline 1 for West Burton Solar is Friday 24 November 2023. As the proposed marine licensable activities for this project are the same as the Cottam Solar Project, we are of the same opinion that with regards to all that has been provided to date, we do not consider either DCO to require a deemed marine licence (DML) as the activity is considered exempt. MMO would welcome any further information regarding other marine licensable activities.*" (MMO submission dated 21 November 2023) "*… you will likely be aware that the MMO has submitted responses to all deadlines and have maintained our position that unless we are provided anything different from the applicant with regards to the methodology (something that is marine licensable and not covered by an exemption, as is currently the case with the borehole element of the proposed activities) we are of the opinion that a Deemed Marine*

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			License is not required and could not be included as part of the dDCO due to the fact that no activities are marine licensable. *Having looked at the other two projects, it appears that the methodology and activities are exactly the same as Gate Burton and therefore we are of the same opinion as above for these also, that as there are no marine licensable activities, a deemed Marine License shouldn't be included.*" (MMO submission dated 1 November 2023) "*2. Exempt Activities* *2.1 Article 4(1) of the Marine Licensing (Exempted Activities) Order 2011 ("2011 Order") states that a marine licence is not needed for an activity that is an exempt activity.* *2.2 Article 35(1) of the 2011 Order states "Article 4 applies to a deposit or works activity carried on wholly under the seabed in connection with the construction or operation of a bored tunnel."* *2.3 The Applicant is proposing, under Work No.4 (as set out in Schedule 1 "Authorised Development") to carry out trenching for cabling by way of a bored tunnel. It has been asserted by the Applicant that in carrying out Work No. 4 that the activities will not have a significant effect on the UK marine area.* *2.4 On the basis of the information provided to the MMO by the Applicant, the MMO does not consider that a deemed marine licence can be granted under the DCO for the purposes of the proposed Work No. 4. This is because no marine licence is required for these works*." (MMO submission 30 January 2024)

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			As set out in the MMO's submissions above from the Cottam examination, the Marine Licensing (Exempted Activities) Order 2011 ("2011 Order"), Article 4(1) states "A marine licence is not needed for an activity that is an exempt activity". Article 4(2) provides that an activity is an exempt activity to the extent that it is an activity to which Article 4 applies and where the application of Article 4 to an activity is subject to a condition specified in Part 3 of the 2011 Order, that condition is satisfied in relation to that activity. Part 3 of the 2011 Order then sets out activities to which Article 4 applies and conditions. Article 35 is one of the articles included in Part 3 and provides: *(1) Article 4 applies to a deposit or works activity carried on wholly under the sea bed in connection with the construction or operation of a bored tunnel.* *(2) Paragraph (1) is subject to conditions 1 and 2.* *(3) Condition 1 is that notice of the intention to carry on the activity must be given to the licensing authority before the activity is carried on.* *(4) Condition 2 is that the activity must not significantly adversely affect any part of the environment of the UK marine area or the living resources that it supports.* *(5) But article 4 does not apply to any such deposit carried on for the purpose of disposal.* Based on the clear confirmation by the MMO on the directly comparable projects mentioned, the Applicant for One Earth

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			considers the crossing under the River Trent to therefore be an exempt activity, within the scope of Article 35, not requiring a deemed marine licence.
WR81	National Highways [REP1-106]	Construction Traffic Impact According to the submitted oCTMP, construction traffic will be split between the west and east development areas, separated by the River Trent. All construction access for the west area will be taken from the A57 to the west of Dunham while the eastern area will be accessed from the A1133 at a new access junction located to the south of Newton on Trent. Bulk materials will be delivered via the A1 and A57 for the western areas and via the A1133 for the eastern areas respectively. Also, it is forecast that most construction staff will access the site from the A57 and A1133. For National Highways to understand potential impacts on the SRN during construction, we recommend the applicant provide the anticipated construction traffic volume (in cars and HGV) at the following SRN junctions (although impacts may not be limited to): • A1 / A57 Junction • A1 / A46 Junction The anticipated construction traffic volume shall represent the forecasted traffic volume for April 2027 when the peak monthly construction traffic is planned, as shown in Appendix B: Construction Traffic Programme included in the TA. Additionally, we request the applicant provides the following information: 1. The total number of staff; 2. The arrival and departure times for staff traffic; and	The expected traffic at the junction of the A1 / A57 is illustrated in the Table provided in Appendix D of the Transport Assessment [REP1-045]. The relevant columns are those headed “Traffic West of Dunham”. The routing of construction traffic is such that all movements noted in these columns will pass through the A1 / A57 junction. The average traffic increase through the junction is circa 1 vehicle every two minutes during the peak hour. No HGV traffic is predicted to depart the A1 at the A1 / A47 junction. Department for Transport (DfT) data for the A1 in 2023, suggests that the road accommodates 43,080 vehicles per day AADT. The traffic impact of the development on the A1, if all A57 west of Dunham traffic (381 vehicles per day) enters the A1 would be 0.88%. This level of additional traffic is considered not to have any detrimental impact on the operation of the trunk road network. The operational shift hours for staff during construction will be between 0700 – 1900hrs. The total predicted workforce at its peak is 650 staff, with staff minibuses having an occupancy of 8 staff.

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		3. The capacity and occupancy assumptions for the staff minibus. This information is necessary for us to review Appendix C: Daily Peak Traffic Profile included in the TA to ensure it accurately represents the anticipated staff traffic. Once the above information has been provided, National Highways will be in a better position to comment on the overall construction traffic impact of the proposed solar farm.	
WR82	National Highways [REP1-106]	We have checked this and we can confirm that National Highways is shown as holding title to the land parcels in question as they were acquired for the construction of the A57 when the road was a part of the trunk road network. However, by virtue of Section 265 of the Highways Act 1980, a de-trunking order transferred ownership of the highway and the subsoil of the A57 to the local highway authority (LHA): 'The A57 Trunk Road (Markham Moor to Lincoln) (Detrunking) Order 2003'. Therefore, these land parcels are now in the ownership of Nottinghamshire County Council and it appears the ownership record has not been corrected / updated. As such, please update the Book of Reference to reflect the correct position. The applicant has been informed of this updated position.	The Applicant can confirm that the Book of Reference has been updated at Deadline 1 [REP1-013] to reflect the revised ownership details, confirming that the land parcels are held by Nottinghamshire County Council and not National Highways.
WR72	Exolum Pipeline System Limited [REP1-110]	We note for this specific consultation: 1. Exolum's external solicitors VWV are in the process of negotiating Protective Provisions with the applicant's solicitor. 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	As recorded by Exolum, the Applicant agrees that it is in discussions in relation to protective provisions, which it anticipates reaching agreement on by the end of the Examination.

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		process begins. 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.	
WR22	National Grid Electricity Transmission Plc [REP1-111]	The draft Order Powers NGET notes that the Book of Reference and Land Plans indicate that powers for the permanent acquisition of and temporary possession of land and extinguishment of rights are included over NGET's operational land and industrial apparatus. The Applicant is seeking permanent acquisition of rights and temporary possession over several land plots which contain NGET apparatus and are subject to rights held by NGET to maintain their apparatus, including plots 02-001, 04-003, 04-005, 04-006, 04-010, 04-012, 04-013, 04-014, 04-015, 05-011, 06-003, 07-012, 07-009, 07-010, 06-011, 08-010, 08-011, 08-004, 08-007, 08-008, 08-006, 08-009, 08-003, 08-001, 08-002, 08-003 of the Land Plans and referenced in the draft Order as Work Area 1, 4, 5, 6b, 7 and 8. NGET's rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order Limits must be maintained at all times and access to inspect and maintain such apparatus must not be restricted. NGET will require appropriate protection for retained cloud_uk\242357054\3\abuharh 225 July 2025 <<Author.Login>> or proposed apparatus, including compliance with relevant standards for works proposed within close proximity of its apparatus or proposed apparatus. Where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's	The Applicant is in negotiation with NGET in relation to protective provisions and a confidential side agreement, the aim of which is to provide appropriate protection for its apparatus from the construction and operation of the scheme, and the Applicant's powers in the DCO in relation to the authorised development.

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		apparatus, NGET will require appropriate protection in the form of entering into a Side Agreement and through its Protective Provisions. In addition to this, further in depth engagement between NGET and the Applicant is required in relation to the impact on its apparatus and rights	
WR23	National Grid Electricity Transmission Plc [REP1-111]	NGET Land and Infrastructure Impacted The documentation and plans submitted for the Project have been reviewed in relation to impacts on NGET's existing apparatus and land interests located within this area. NGET owns and operates 1 x 400kVA and 1 x 275kVA substations and multiple 400kV overhead lines that are located within and in close proximity to the Order Limits for the Project. These assets form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets are as follows: High Marnham 400kVA Substation High Marnham 275kVA Substation ZDF 400kV OHL – Cottam – Staythorpe 1 – High Marnham – Stoke Bardolph ZDA 400kV OHL - Cottam – Grendon – Cottam – Staythorpe 2 ZDA 400kV OHL – High Marnham – West Burton ZDA 400kV OHL Cottam – Staythorpe 1 – High Marnham – Stoke Bardolph – disc High Marnham ZDA 400kV OHL – Cottam – Eaton Socon – Wymondley 2 4VE 400kV OHL - Cottam – Grendon – Cottam – Staythorpe 4ZV 275kV OHL – Chesterfield – High Marnham 1 - Chesterfield – High Marnham 2 XE 275kV OHL High Marnham – Thurcroft – West Melton	The Applicant acknowledges the presence of NGET's infrastructure and is aware of its operation in close proximity to the project. The Applicant is in negotiation with NGET in relation to protective provisions and a confidential side agreement, the aim of which is to provide appropriate protection for NGET's apparatus near to the site.

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WR24	National Grid Electricity Transmission Plc [REP1-111]	Future NGET infrastructure within / in close proximity to the proposed Order limits The proposed Order limits are in close proximity to or overlap with land required for future NGET infrastructure which is required for future generation connections (subject to obtaining the necessary consents and land rights):- • Construction of a new substation as part of the Brinsworth to High Marham ("BRHM Project") project to the west of the existing site in High Marnham, near Normanton on Trent in Nottinghamshire); and • Construction of a new high voltage electricity transmission line between the new Birkhill Wood Substation in the East Riding of Yorkshire and a new substation a High Marnham in Nottinghamshire (known as the North Humber to High Marnham project) ("NHHM Project"). These proposals are part of NGET's Great Grid Upgrade whereby NGET infrastructure projects across England and Wales are upgraded to connect additional renewable energy to homes and businesses and crucially, contribute to the Government's drive to achieve net zero by 2050. The BRHM Project will involve proposals to build and operate a new 400 kV substation extending to the west of NGET's existing site in High Marnham, near Normanton on Trent in Nottinghamshire. The proposals will include removal of some of the existing equipment and replacing it with new infrastructure. The new substation will facilitate connections of third-party customers to the electricity transmission network, including the Project. The BRHM Project also propose temporary and permanent diversions of the existing Chesterfield to High Marnham, High	The Applicant is negotiating protective provisions with NGET and anticipates that such provisions will provide protection for NGET's proposed infrastructure in the area. Equally, the Applicant would expect provisions to be included that also provide protection for the authorised development from the proposed NGET projects, and which require cooperation between the parties in this respect. The Applicant acknowledges and is aware of the existing protective provisions within the AYM and Mona DCOs and will look to incorporate any appropriate provisions in the protective provisions.

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		Marnham to Stoke Bardolph cloud_uk\242357054\3\abuharh 3 25 July 2025 <<Author.Login>> and High Marnham to West Burton overhead electricity lines. BRHM have undertaken non-statutory consultation. The NHHM project which proposes to construct a new 400kV overhead line is a Nationally Significant Infrastructure Project ("NSIP") and is required to reinforce the electricity transmission network between the north of England and the Midlands. The NHHM project completed their statutory consultation stage earlier this year. Engagement between The Project and the NHHM has been ongoing since December 2023 to identify interactions between the two projects and is expected to continue regarding suitable interface arrangements to facilitate the delivery of both projects. NGET welcomes the opportunity to enter into a Statement of Common Ground ("SOCG") with the applicant. The Project seeks the ability to compulsorily acquire rights over land within which the High Marnham substation and part of the Brinsworth to High Marnham Project, will be constructed (to which the Project will connect). The Project also seeks the ability to compulsorily acquire rights over land within which the proposed route for the NHHM Project is proposed be constructed. It is imperative that adequate protection is secured for NGET to safeguard its ability to deliver and operate its future projects both in terms of protection for future assets as well as future land and rights for the delivery of these projects. Protective Provisions It is noted that the draft Order as applied for did not include suitable protective provisions	

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		for the benefit of NGET. In light of the interactions with the Project and existing and future NGET assets NGET requires its Protective Provisions to be included within the draft Order to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. In addition it is particularly important that in light of the above interactions with the Project and various NGET projects, NGET also requires that the Protective Provisions include cooperation provisions for its future assets including the NHHM and BRHM projects. The recently granted Awel Y Mor Development Consent Order ("AYM DCO") and Mona Offshore Wind Development Consent Order ("Mona DCO") provide precedents 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. This was because 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 NGET customer 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 seeks a form of protective provisions based on those included in the AYM DCO and the recently granted Mona DCO. NGET is currently in the process of agreeing with the Applicant the protective provisions along with any supplementary agreements which may be required. NGET will keep the	

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		Examining Authority updated in relation to these discussions.	
WR01	Network Rail Infrastructure Limited [REP1-113]	As set out in Network Rail's earlier relevant representation, the Book of Reference (document reference number 4.3) identifies the following plots of land over which Network Rail have rights, own or occupy. The relevant plots are as follows: 1. Freehold owner and Occupier in respect of the High Marnham 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); 2. 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); 3. 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, grassland, tanks, car park, copses, hedgerows, drains, access roads and overhead electricity cables (High Marnham Substation) (plot 05-011); 4. 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);	The Applicant can confirm that the plot references and descriptions align with the Book of Reference submitted at Deadline 1 [REP1-082]. However, the Applicant would note that in respect of Plot 05-008, Network Rail are a listed in the Book of Reference [REP1-082] as a reputed owner. To date the Applicant has not received formal confirmation of this interest or any others believed to be held by Network Rail within the Order Land.

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		5. 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); 6. 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); 7. 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);10-103740160-1\43283-5236 8. 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); 9. 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); 10. 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); 11. Rights over third party land as stated in an Agreement dated 29 December 1959 – Permanent acquisition of new	

Internal Ref	WR	Summary	Applicant Response
		rights over 1806 square metres of electricity substation, outbuildings, hardstanding, access road and overhead electricity cables (High Marnham Substation) (Plot 08-008); 12. 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) (Plot08-009); and 13. 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).	
WR02	Network Rail Infrastructure Limited [REP1-113]	Network Rail requires protective provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with the relevant safety standards. The content and format of these protective provisions is contained within Appendix 1 of the NR's relevant representations submit on the 15 May 2025.	The Applicant is negotiating protective provisions with Network Rail and anticipates reaching agreement in this respect before the end of the Examination, at which time the agreed protective provisions will be included in the draft DCO.
WR03	Network Rail Infrastructure Limited [REP1-113]	Network Rail requires a private agreement to regulate the manner in which rights over railway property are to be granted and in which works are to carried out in order to safeguard Network Rail's statutory undertaking. Engineers for Network Rail are continuing to review the extent of impacts on operational railway and Network Rail property and any mitigation required (including NR's review and prior approval of the design proposals for the parts of the DCO scheme which interface with the railway at detailed design and construction stages) will be considered in this agreement.	The Applicant is expecting to negotiate a confidential framework agreement with Network Rail as part of the negotiation of protective provisions, and would anticipate reaching agreement in this respect before the end of the Examination.

Internal Ref	WR	Summary	Applicant Response
WR04	Network Rail Infrastructure Limited [REP1-113]	The completion of the necessary deeds of easement and asset protection agreement to govern the construction, maintenance and, where appropriate, removal of the parts of the development proposed by the DCO which are located on or adjacent to operational railway land.	The Applicant is negotiating a basic asset protection agreement with Network Rail currently. In combination with the framework agreement being negotiated with Network Rail, these agreements will secure any additional documents or agreements required.
WR21	Andrew Charles Coverdale [REP1-118]	"I have read many comments from fellow residents directly affected by this proposal and with regards to how this proposal has been put together by Orsteds Team. The benefit to the residents of the villages are zero. We lose agricultural land, diminish the farming community and all associated businesses locally that rely on the farming community. The landowners have been put in an impossible position. They are effectively being bribed to free up their land because the price per acre index linked is £1000.00. This is way above the £250 p.a. average if it was worked. I fully understand why they would accept this offer. I know some farmers and current village residents, if this project goes ahead will leave the area as a result. Has Orsted factored this into the welfare of the community? It is said solar panel occupies 0.1% currently of UK land. If One Earth Project and all other currently proposed solar farms are approved including those already approved this area (Lincolnshire/Nottinghamshire) covered will be nine times the size of Skegness (by Jamie Waller, Local Democracy Reporter 17th July Lincolnshire World) In further context this would 9% of the size of Newark and Sherwood parliamentary constituency as quoted by Robert Jenrick MP This is destruction of great farming land for little benefit and unfair for this community. How	The proposed development is considered a Nationally Significant Infrastructure Project because of the considerable amount of energy it will produce, contributing to national energy targets to help in the fight against climate change, support energy security and reduce energy costs. Current policy calls for a tripling of solar capacity, which would amount to 0.3% of UK land to meet. Beyond supporting national targets, the Applicant has committed to ensuring that there are local benefits as well. This includes a commitment to using local labour when possible, and developing a Community Benefit Package that will be developed through ongoing consultation with the community and other stakeholders. It is also noted a 60- year consent lifespan is being applied for which is temporary and reversible for the majority of the land, as confirmed through recent SoS decisions (see 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 of agricultural land.

Internal Ref	WR	Summary	Applicant Response
		can a project of this size be justified as a national infrastructure project that in effect can only generate power effectively a third of the year. It's madness. What has become clear is this is an amaturish proposal put forward by Orsted for One Earth solar farms. They have failed to properly engage with local stakeholders, been opaque, and based detail on assumptions rather than fact. It is almost as though they do not need to do to much fact finding as this project they believe will be passed anyway regardless of objections or the affected parties requests for details of the proposals, which are sadly lacking. I will site cite the 49 actions from the last planning inspectorate hearings of the 8th, 9th, and 10th July, many points showing their disregard for factual information and vague language and failure to disclose where inverters and battery storage would be placed. Surely this is a fundamental disregard again to the local community, an arrogance. This clearly shows Orsted are not a fit organisation given that their vast resources have failed to plan, organise and consult with empathy and effectively with affected parties. All they have achieved is division for no benefit to this community. This is a lesson in failure, which is why this project should not go ahead”	
WR70	Craig Walker [REP1-120]	As requested by the Examining Authority, please find below additional information in relation to the comments I made at Issue Specific Hearing 1 agender item In respect of Grid Connection I attended the consultation for the proposed 400kv High Marnham substation which was held at South Clifton Coronation Hall on 26/04/2024 at 2PM.	The Applicant has responded to this in Agenda item 6 Electricity Generation and Grid Connection, Written Summary of Applicant’s Oral Submission at the Issue Specific Hearing 1 (ISH1) [REP1-077]. The Applicant considers the proposed 400kV substation to be a suitable and viable connection point. Based on its location and

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		On speaking with the representative from National Grid in relation to the proposed One Earth Solar Farm project and the at the time split connection between the 275kv and proposed 400kv substation I asked what was the current situation with capacity on the 275kv substation and what would be the outcome if the 400kv substation did not get approval and where would this leave its prospective customers who have connections assigned on the 400kv system. The answer was that the 275kv system could not accept these customers but National Grid had an obligation to provide a connection to these customers if the 400kv system fell through. I asked how they planned to accommodate this when the current sub station was at capacity but again I was told they had an obligation to provide a connection. All I took from the consultation was there is an obligation but no way logistically to provide without the 400kv substation, this begs the question why the applicant move all of its allocated grid connection which was split over two separate connections one part on the 275kv system and one on the 400kv system to all being on the 400kv system which could be blocked by town and country planning. In relation to questions asked by the ExA on the new 400kv network that is planned (via NSIP) to go from the East Coast (Willington) To Chesterfield I feel that the applicants technical expert was misleading his his response to ExA on the importance of the 400kv High Marnham Substation. It does infact have no impact on the 400kv line which is mainly there to bring power from off show renewables, If High Marnham does not get permission from T&C planning the line will still operate. So What Happens If High Marnham Doesn't Get Built? 1. The Chesterfield–Willington line will still go ahead.	standard assessment processes, the Applicant sees no clear reason why consent for the substation would be refused.

Internal Ref	WR	Summary	Applicant Response
		• It has its own NSIP process, route, and strategic justification. • It connects into existing infrastructure at Willington (South Derbyshire) and Chesterfield. • It does not depend on High Marnham's approval to proceed or function. 2. But... generation projects like One Earth Solar Farm may be blocked or delayed. • If One Earth's grid offer is tied to High Marnham, and that substation doesn't get consented: • Their grid connection becomes non-viable. • They would need to reapply for a connection, possibly at Chesterfield or elsewhere . • This could delay the solar farm significantly or even make it unfeasible. 3. System Impact: Limited. • The grid as a whole is designed with redundancy and routing flexibility, so National Grid would likely reroute flows. • But planned generation capacity relying on High Marnham would have no access point, which undercuts their projects. ☑Summary • Chesterfield–Willington 400 kV line can and will proceed independently. • High Marnham's cancellation would not impact the rest of the transmission system. • But it would directly undermine projects (like One Earth Solar Farm) that depend on connecting to it.	
WR33	Heather Fox [REP1-122]	Remarks ref. Volume 5 Reports and Statements EN010159 Consultation Report Appendix K-1 Ref. EN010159/APP/5.1	Responses to each item raised and associated with Chapter 8: Hydrology and Hydrogeology of the PEIR within Appendix K-1 of the Consultation Report [APP-162] are provided

Internal Ref	WR	Summary	Applicant Response
		8.4 ` Given the nature of Hydrology and Hydrogeology it is difficult to define a study area with confidence`. A very telling statement, especially with regard to separating the functional floodplain Zone 3b from Zone 3a. 8.13 Why does this have to be in flood Zone 2 and 3, use good BMV land AND be in a Drinking Water Protected Area? 8.15 It may be fluvially dominant but not exclusively. Heavy rain and high tides do coincide. 8.17 Ref. map Fig 8.5 `It is worth noting the drone survey was undertaken AFTER the peak flow of the flooding and the extent illustrated may not be the maximum that occurred. ` So the map on its own is misleading, as there is no mention of this. 8.23 All these factors are unpredictable so how can there be certainty of minimal changes? 8.27 There is no combined map of the surface water and fluvial, as surface water has not been modelled. So there is no ref. to a map of the combined effect. 8.34 Given all the uncertainties around hydrology there is no guarantee that the panels will be in areas where flood levels are less than 1.5mtrs, so calculations may be inaccurate. 8.35 Having acknowledged point 8.34 how many is a `small portion`, so calculations could be accurate? 8.41` Where possible`. Again an indeterminate number. 8.42 The assertion that rain behaves as if the panels were not there is challenged by other research, with much greater predicted flow and erosion rates. 8.52 Conclusion again `No likely significant effects`. Significant is never quantified.	below. However, it is worth noting that consultation with statutory consultees has been ongoing since submission of Chapter 8 of the PEIR, dated May 2024 and design development has occurred meaning that some points raised in Chapter 8 may not be applicable to the current scheme. Item 8.4 The study area is clearly defined within Item 7.3.1 of Chapter 7 of the Environmental Statement [AS-053] and in Figure 7.1 “Study Area” [APP-052]. This defines the study area as having a 1 km buffer around the Order limits. Flood Zone 3a and 3b are clearly defined within Section 3.1.4 and Figure 3-6 of the Flood Risk Assessment [AS-051]. Flood Zone 3b is considered to be land with a 1 in 30 year or greater annual probability of flooding and Flood Zone 3a is land with a 1 in 100 year or greater annual probability of river flooding. Item 8.13 With regard to site selection, the Applicant undertook a comprehensive and methodical site selection process, guided by the specific technical and operational requirements of large-scale solar development. This process included a site search and a multi-stage assessment to identify and evaluate potential locations against a wide range of constraints, including proximity to grid connection infrastructure, BMV, land availability, solar irradiance, topography, flood risk, designated environmental and heritage assets, and land use conflicts.

Internal Ref	WR	Summary	Applicant Response
			The Site Selection Report (Appendix 1 of the Planning Statement [APP-168]) provides a detailed account of this process and explains why the Proposed Development site was ultimately selected as the most appropriate and viable option. The search demonstrated that suitable alternative sites of comparable scale, capable of meeting the project's energy generation objectives and grid connection requirements, are extremely limited. <u>Item 8.15</u> The fact there is a tidal influence is acknowledged at 8.7 within Chapter 8 [APP-162] where the following is stated *"although there are tidal influences associated with the watercourse, at our Site this is considered to be fluvially dominated i.e. water levels are generally dictated by rainfall within the river catchment rather than tidal fluctuations."* The above is also reinforced within Section 3.1.3 of the FRA [AS-051]. <u>Item 8.17</u> It is intended that Figure 8-10 within Chapter 8 [APP-162] be read in conjunction with the prior paragraph which clearly sets out that the extent illustrated may not be the maximum that occurred. <u>Item 8.23</u>

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			The inference of paragraph 8.23 is that in general there would be minimal changes from a hydrological and hydrogeological perspective. This is on the basis that other than climate change implications, there are limited external sources that could impact the future baseline flood conditions. The effects of climate change assessed and set out are in line with the EA's climate change guidance. Item 8.27 A combined map showing surface water and fluvial flooding is not prepared. However individual figures showing surface water flooding and fluvial flooding are shown in Figures 8-6 and 8-3 respectively within Chapter 8 [APP-162]. The flood risk figures noted above were updated within the FRA [AS-051] to account for the latest EA flood mapping. Item 8.34 The assessment of fluvial flood risk and associated mitigation is based on the best available modelled data provided by the EA. The design flood event (i.e. 1 in 100 year plus 39% climate change) has been used to determine what is appropriate mitigation (i.e. such as panel raising) and is in line with the EA's requirements. Item 8.35

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			The quantified amount of panels partially submerged at the time of preparing Chapter 8 was not confirmed. However, this has since been quantified to be up to 3% of the total panel areas and this is to be referenced in the updated FRA submitted as part of Deadline 2. Item 8.41 In a number of locations, panels will be located within the pluvial flood risk extents. However, as set out, the mitigation provided for fluvial flood risk will also provide mitigation against pluvial flood risk. Item 8.42 A response relating to the management of surface water runoff from the solar panel areas has been provided as part of the responses to the relevant representations. Refer to response to Relevant Representation RR.154 within the Applicant's Responses to Relevant Representations [REP1-075]. Item 8.52 It is the Applicant's view that once the environmental management plans and environmental measures are implemented, there will be no likely significant effects to the receptors during construction or decommissioning. The environmental measures to be implemented and the likely significant effects to receptors is assessed in greater

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			detail in Chapter 7 of the ES [AS-053], refer to Item 7.3.13 which defines the significant of identified effects.
WR34	Heather Fox [REP1-122]	10. Hydrology and Hydrogeology 10.1.15 Capacity at High Marnham was the primary driver. This is not available, yet an unexplained distance of 10 km from there was chosen. 10.1.16 Large areas to the west of Marnham, within 10 kms and in flood zone 1 were identified. 10.1.17 Landowners were unwilling to surrender the land. It was the applicant`s choice to secure voluntarily. This land was discounted due to being `predicted` land of higher value but this was not tested. Why was this not investigated or the search area widened? Further west there were more settlements. It was argued visual and amenity impact would be greater there. It could be said that this urbanised area would have been less impacted by further urbanisation than the selected, very rural, flood prone area chosen. 10.1.2 It is arguably not possible to safely manage flood flow routes at the time of flooding if there are restrictions / debris on the floodplain. 10.1.9 `Will not impede water flow `. How is it possible to have structures on a floodplain with no effect on flow. 10.1.11 Not certain to `not increase flood risk elsewhere ` as the total accumulation of debris/damage scenarios or even structures on the floodplain have been included. 10.1.12 Flood zone 3b ` The order limits include no electrical infrastructure, enhancements and mitigation only`. This is the functional floodplain. This is the mitigation. What enhancements are the applicants adding? 10.1.26 `Majority of inverters`. How many is majority?	Responses to each item raised and associated with Chapter 10 within Volume 5 Planning Statement [APP-168] are provided below. <u>Item 10.1.15</u> In identifying a site, the point of connection was the starting point, and that's been acknowledged as an appropriate starting point for site selection in numerous solar DCOs examined and made to date. The initial 10km search area was driven by the desire to be as close to the point of connection as possible, 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. <u>Item 10.1.16 and 10.1.17</u> There are areas of Flood Zone 1 towards the west of the 10 kilometre search area, which is land on higher ground, but that also gives much more expansive, open, distant views in the agricultural landscape. The Applicant considered in relation to that land that it wouldn't be appropriate for a large scale solar scheme in the same area, due to a range of other environmental constraints, including being in close proximity to a residential area, and clusters of listed buildings and conservation areas. Other locations to the north, west, south west, and south east were identified as having constraints in terms of conservation areas, ancient woodland, existence of

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		10.1.33 No certainty over location of equipment, merely `wherever possible`, `small localised areas'. Negligible impact is acknowledged on the floodplain storage as a result of the panel upstands but there is no allowance for possible submerged panels or fencing and as the size of panels has yet to be decided that is another unknown quantity. 10.1.34 Concludes` that the proposed development will not increase flood risk from any sources`. How can this be such an absolute conclusion when all the information ref. upstands, panels and debris calculations are not available? Does the Environment Agency`s Tidal Trent Modelling include the structures , panels and fencing as possible debris? Floating debris in water suggests more power and potential for damage. Having lived 600mtrs from the Trent for yrs I have seen trees going past ! Is the flood modelling based around flood defences built in the 1950`s, when there was no expectation of structures being allowed on the floodplain?	BMV agricultural land, or more significant cumulative effects when combined with other developments. In terms of further assessment and detailed testing of this land, it is accepted that at site selection stage the Applicant only needs to take into account publicly available data and information to make an informed view on site suitability, it is not expected that the Applicant should spend additional time and funding on intrusive, on-site assessments of all alternative land within a 10km radius ahead of site selection. Additionally the applicant has undertaken a Sequential Test [APP/9.15] which also test the suitability of available land. 10.1.2, The FRA [AS-051] includes a full assessment of flood risk from all sources and confirms that there will be no increase in flood risk from sewers, groundwater, artificial sources as a result of the proposed development. With regards to fluvial and pluvial flood risk, the updated FRA indicates that there would be a negligible impact on flood risk which is within tolerances agreed with the EA and is discussed further below. Within the updated FRA (submitted at Deadline 2), an assessment of the impact on flood storage capacity has been undertaken which considers the panel mounting structures, partially submerged panels and the inverter voided structures. This assessment is considered to be conservative and confirms that in the design flood event increased flood depths of 4.1mm and 2.3mm could be observed to the east and west respectively of the River Trent. These increased flood depths are within the 5mm

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			tolerance that the EA indicated would be acceptable as this is within model tolerances. The impact on flood risk is therefore considered to be negligible. With regards to the safety of the development, BESS and substations have been located outside of the design flood risk extent (i.e. the 1 in 100 year plus 39% climate change scenario as illustrated in Figure 3-8 of the FRA, updated at Deadline 2). For the purposes of informing the potential impacts on flood storage capacity and debris impact, a structural assessment to determine a typical design of the panel mounting structures and inverter voided structures (within the design flood extent) has been undertaken. This assessment takes in to account the likely velocity of flood flows and potential debris impact and has been used in assessing flood storage capacity. For clarity, the structural assessment undertaken and details summarised in the updated FRA (submitted at Deadline 2) considers worst case assumptions (in terms of flood depth, velocity and potential debris impact) and is the most robust structure anticipated. However, at detailed design, area specific conditions and likelihood of debris impact will be considered so that efficient sizing of structural features can be undertaken. Note that this will also further reduce the already negligible impacts on flood storage volumes 10.1.9 Paragraph 5.8.41 of EN -1 makes reference to development within Flood Zone 3b. For clarity, there is no built

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			development proposed in Flood Zone 3b which would cause losses in floodplain storage or impede flows. 10.1.11 With regards to confirming no increase in flood risk, refer to response to item 10.1.2. With regards to the safety of the development, BESS and substations have been located outside of the design flood risk extent. The majority of panels have been raised to be above the design flood levels and structural design of the panel frames and inverter voided structures within the design flood extent has been undertaken and it is confirmed that these can and will be designed adequately to accommodate the likely velocity of flood flows and debris impact without failure. 10.1.12 Enhancements within Flood Zone 3b comprise: landscape and biodiversity mitigation and enhancement areas; habitat creation and management, including earthworks, landscaping, means of enclosure, and the laying and construction of drainage infrastructure; and improvements to existing public rights of way, signage and information boards. 10.1.26 The Applicant has set a number design parameters for the siting of Power Conversion Units (PCUs) (which contain the inverters) to mitigate any potential noise impact. In addition to these parameters the applicant will seek to place PCUs in

Internal Ref	WR	Summary	Applicant Response
			areas of no or low flood where possible. The exact location of PCUs cannot be determined until detailed design. As such, the exact numbers of PCU in or out of areas of flood cannot be determined. 10.1.33 Sensitive electrical equipment is not located within Flood Zone 3b. An assessment of the impact on flood storage capacity has been undertaken which considers the panel mounting structures, partially submerged panels and the inverter voided structures. This assessment is considered to be conservative and confirms that in the design flood event increased flood depths of 4.1mm and 2.3mm could be observed to the east and west respectively of the River Trent. These increased flood depths are within the 5mm tolerance that the EA indicated would be acceptable as this is within model tolerances. The impact on flood risk is therefore considered to be negligible. 10.1.34 Updated calculations have been undertaken to confirm the impacts on flood storage capacity and it is concluded that this impact is negligible. Refer to Section of the FRA, submitted for Deadline 2. For the purposes of informing the potential impacts on flood storage capacity and debris impact, a structural assessment to determine a typical design of the panel mounting

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			structures and inverter voided structures (within the design flood extent) has been undertaken. This assessment takes in to account the likely velocity of flood flows and potential debris impact and has been used in assessing flood storage capacity. For clarity, the structural assessment undertaken and details summarised in the updated FRA (submitted at Deadline 2) considers worst case assumptions (in terms of flood depth, velocity and potential debris impact) and is the most robust structure anticipated. However, at detailed design, area specific conditions and likelihood of debris impact will be considered so that efficient sizing of structural features can be undertaken. The development proposals (i.e. solar farm areas and inverters in the floodplain) have been designed to maximise the clear space between columns, minimising the potential for debris to accumulate. Even if there were to be some debris build up, flows could continue to flow around debris and structures. It is considered therefore that the Proposed Development has been designed appropriately and there will be negligible impact on flood risk. The EA's hydraulic modelling does not include the structures, panels and fencing. In discussions with the EA, it was agreed that updates to the hydraulic modelling were not required and that other quantified methods could be adopted. A quantified assessment of the impact on flood storage capacity has now been undertaken which considers the panel mounting structures, partially submerged panels and the inverter voided structures. This assessment is considered to be conservative and confirms that in the

Internal Ref	WR	Summary	Applicant Response
			design flood event increased flood depths of 4.1mm and 2.3mm could be observed to the east and west respectively of the River Trent. These increased flood depths are within the 5mm tolerance that the EA indicated would be acceptable as this is within model tolerances. The impact on flood risk is therefore considered to be negligible. The EA's Tidal Trent (2023) modelling includes the existing flood defences associated with the River Trent.
WR35	Heather Fox [REP1-122]	National Policy Statement for Renewable Energy EN 1 5.8.7. Operational during a flood. This is not certain and possibly out of action during winter when demand is highest. 5.8.11 Where are the calculations for reducing flood risk overall and not increasing flood risk elsewhere? 5.8.12 How will constriction of flow rates be managed during a flood? It is not possible to clean up during a flood unless NSIP`s are immune from health and safety regulations? 5.8.15 Flood arising from the project itself. Where is consideration for failure of the structures, leading to dislodgement and ensuing debris. 5.8.36 ` Land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development`. Has it?	<u>Item 5.8.7</u> The Proposed Development is designed and constructed to remain operational in times of flooding. The 3% of panels that may be partially submerged in the 1 in 100 year plus 39% allowance for climate change event are designed to be operational during that flood event. It may be that these panels are not utilised during a flood event to take a precautionary approach but they are designed and constructed to remain operational. Refer to page 41 of the Written Summary of Applicants Oral Submission at the Issue Specific Hearing [REP1-077]. <u>Item 5.8.11</u> It is not stated that there is a reduction in flood risk as a result of the Proposed Development, which is in compliance with 5.8.11 of EN-1 which states "**where possible** will reduce flood risk overall" (our emphasis) An assessment of the impact on flood storage capacity has been undertaken which considers the panel mounting structures, partially submerged panels and the inverter

Internal Ref	WR	Summary	Applicant Response
			voided structures. This assessment is considered to be conservative and confirms that in the design flood event increased flood depths of 4.1mm and 2.3mm could be observed to the east and west respectively of the River Trent. These increased flood depths are within the 5mm tolerance that the EA indicated would be acceptable as this is within model tolerances. The impact on flood risk is therefore considered to be negligible. Refer to the FRA submitted with Deadline 2. The FRA [AS-051] also assesses flood risk from other sources (groundwater and artificial sources) and concludes that mitigation is provided where required (i.e. mitigation provide for fluvial flood risk would also provide mitigation for pluvial) or that the risk of flooding is low. Item 5.8.12 It is not intended that maintenance activities or inspections be undertaken whilst a flood event is occurring. Due to safety, it is indicated in the FRA [AS-051] and responses to the relevant representations (RR.063 within [REP1-075]), that any required inspections or maintenance will be undertaken following a flood event and immediately once flood water has receded. Item 5.8.15 For the purposes of informing the potential impacts on flood storage capacity and debris impact, a structural assessment to determine a typical design of the panel mounting structures and inverter voided structures (within the design flood extent) has been undertaken. This assessment takes in

Internal Ref	WR	Summary	Applicant Response
			to account the likely velocity of flood flows and potential debris impact and has been used in assessing flood storage capacity. For clarity, the structural assessment undertaken and details summarised in the updated FRA (submitted at Deadline 2) considers worst case assumptions (in terms of flood depth, velocity and potential debris impact) and is the most robust structure anticipated. However, at detailed design, area specific conditions and likelihood of debris impact will be considered so that efficient sizing of structural features can be undertaken. The structural assessment undertaken to determine a typical design indicates that the panel mounting structures and inverter voided structures can include a clear span between columns, thereby minimising the potential for blockages to occur and allowing free flow of water. The typical span dimensions are set out below for clarity: • Voided Inverter Structures – 2.4m span along width and 6m along length • Panel Mounting Structures – 3.2m span along width and 6m along length. As part of the structural assessment uplift forces due to flooding conditions were also considered and it is confirmed that typical panel connections would be sufficient to withstand flow conditions without detaching. <u>Item 5.8.36</u> In discussions with the EA, the Applicant has not been made aware of any present or future flood risk management measures that are to be implemented within the Order Limits.

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			However, to ensure that access (and ecological) corridors are maintained, it is proposed that the following buffers will be provided (as set out in the FRA [AS-051]): • A minimum 10m buffer from all ordinary watercourse and field drains/ditches to any above ground built development, (in excess of the 9m required within Trent Valley IDB's Byelaws). • A minimum 16m buffer from the River Trent's flood defences to any above ground built development. It is worth noting that the buffers from the River Trent flood defences actually extend far beyond the 16m minimum. Furthermore, no built development is proposed in Flood Zone 3b which is defined as the functional floodplain.
WR36	Heather Fox [REP1-122]	Consultation Report EN010159/APP/5.1 6.2.38 The applicant states they have included the questions and responses from the meeting on 1st August 2024 between themselves and North Clifton Parish and South Clifton Parish Council in appendix J-2. They are not in the Consultant Report or in any of the appendices. Correspondence with One Earth and a sequence of events would appear to suggest that this is a deliberate omission. One Earth is either incompetent or not fit to have their proposal approved. Since the Statutory Consultees and the Inspectorate were presented with a report with a material omission, I would submit that the process of examination should be put on hold until this is investigated.	The Consultation Report [APP-151] refers to a series of detailed questions that were submitted after a meeting with North Clifton, South Clifton, and the Say No To One Earth group. The Applicant reviewed this long list of detailed questions and responded through careful consideration and detailed responses back to the groups. However, the attachment was not included in the Consultation Report Appendices. This is an omission that has now been corrected in the updated file submitted at Deadline 1 [REP1-017].

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		The omission would suggest that those who approved the report and the Inspectorate have not paid attention to the substance of the report before passing it and allowing it to proceed to examination. What recourse is there for this?	
WR37	Heather Fox [REP1-122]	Miscellaneous. Will there be any alert system for warning of weakened structures? Has any thought been given to the salinity level of the Trent, ref. contact with metal, glass and cables. Panel positioning in relation to contours affects the runoff and erosion .Which way will they be aligned? What number of panel detachments have been included in the calculations? If structures become detached what precautions have been taken to protect the flood defences? What is the plan if significant numbers of panels are detached and thoughts as to where this debris would collect? What assessments have been made for increased turbulence as the water passes from the front of one structure to the next? Where have the drain gates in North Clifton been included in the flood risk assessments for the village? Similarly, the natural spring at the top of the sloping field to the north of the village? This has panels planned on it and it drains down into the already compromised drainage system of North Clifton. Who verifies all the calculations in the report?	It is not proposed that live monitoring of structures or alert systems will be included. This is on the basis that structures within the floodplain will be designed to withstand the anticipated flood flows and impact from debris. However, maintenance and inspection of structures will be undertaken to ensure their structural integrity is maintained. On the basis that the River Trent at this location is predominantly fluvial (rather than tidal), it is anticipated that salinity levels will be low. However, any structural elements within the floodplain will be galvanised to resist any corrosion associated with saltwater. Additionally, panel and electrical equipment will be specified to manage this environmental effect also. The orientation of the panels varies across the site is likely to generally be fixed south facing however, runoff from the panels themselves will be direct to the ground beneath at which point the natural regime will be maintained as existing ground topography is to remain (noting that runoff will be to the managed vegetated ground cover). As set out in the FRA **[Section 4.2.1 of the FRA submitted with Deadline 2],** vegetation cover is to be included and maintained to manage runoff and control potential erosion due to runoff from panels and furthermore, SuDS features such as filter drains, swales and basins/scrapes are to be included at strategic locations.

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			Panel detachments have not been included within calculations however, structural assessments undertaken to determine a typical design of the panel mounting structures indicate that flow conditions can be accommodated and that clear spans between columns can be provided to reduce the potential for debris to accumulate within the Site. As part of the structural assessment uplift forces due to flooding conditions were also considered and it is confirmed that typical panel connections would be sufficient to withstand flow conditions without detaching The existing flood defences in the vicinity of the Site are predominantly embankments which are noted by the EA to be in a fair to good condition (the only exception to this is the Fledborough Embankment which is shown to be in poor condition). Based on the flow conditions of the River Trent at this location (i.e. relatively low velocity of flows), it is not anticipated that debris impacts to the flood defences would cause damage. However, surveys of the existing defences are to be undertaken at detailed design and the potential impact from debris to the defences would be assessed at this stage. It is understood that the EA conducts regular inspections of the existing flood defences however, as riparian owners of the defences within and adjacent to the order limits, the Applicant will undertake their own inspections of the defences, particularly following a flood event. It was agreed with the EA that hydraulic modelling was not required to support the application but that other quantified methods could be used. With this in mind, turbulence due to structures within the floodplain has not been considered.

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			However, the maximum velocities in the 1 in 100 year plus 62% climate change event (i.e. maximum credible scenario and greater than the design event that policy indicates should be used) have been reviewed in the design of the panel frames and inverter structures, Furthermore, the velocity designed for at this stage was also conservative in that 0.9 m/s was chosen when in reality, the majority of panels within the floodplain would only experience up to 0.4 m/s. The EA's hydraulic modelling does not include the structures, panels and fencing. In discussions with the EA, it was agreed that updates to the hydraulic modelling were not required and that other quantified methods could be adopted, in which we have assessed the impact on flood storage volumes. With regards to the EA flood gate and natural spring, these have been addressed within the Applicants Responses to Relevant Representations [REP1-075], see number RR.100 The reports and calculations are undertaken and reviewed by suitably qualified consultants. Furthermore, reviews are undertaken by the statutory consultees (such as the Environment Agency and Lead Local Flood Authorities).
WR38	Heather Fox [REP1-122]	Effect of Micro and Nano plastics on Soil Health and Plant Growth. This is in relation to the cabling deterioration over the 60-yr period. Micro and nano plastics can negatively impact both. They can hinder root growth, reduce nutrient uptake and disrupt photosynthesis., leading to stunted growth, and reduced yield. MNP`s also affect soil microbes, impacting nutrient cycling and therefore soil fertility. Applied Soil Ecology Vol194 Feb 2024 Meta-	There is no current UK guidance specifically related to the assessment of potential micro and nano contaminant release from buried cables of the type likely to be used at the Proposed Development, or any regulation preventing their use in any environment. Electricity cables of the type likely to be used at the Proposed Development are not currently considered to represent a potential source of contamination

Internal Ref	WR	Summary	Applicant Response
		analysis revealed diverse effects of micro and nano plastics on EDIBLE crops. Exposure affected root and shoot growth. Plant species, polymer type, particle size and contamination level, defined the crop`s response. These plastics accumulate in eco systems and persist for decades. Recent estimates suggest their content could be higher in soils than aquatic environments. Micro plastic quantities appear to be higher in agricultural soils. Existing research indicates that MP`s have the potential to alter various physiochemical and biological soil characteristics, including porosity, aggregate size and formation, water holding capacity, evaporation rate, acidity and nutrient availability. Something to think about when suggesting the soil will be healthier after 60 yrs.	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 [APP-178] 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. 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 to a maximum depth of 1.2m (as per the ODP [REP1-021]). Any cable above 0.9m will be removed during decommissioning (as peas per the oCEMP [REP1-047])

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WR39	Heather Fox [REP1-122]	Consultation process If I had submitted documents in a professional capacity that elicited a response `wholly insufficient ` from the receiving local authority I would have been humiliated. This was a response from ..... to part of the applicant`s ..... report. I asked the local authority if this was the standard to be expected of an enquiry as I had no previous experience. Another example was the suggestion to put bird boxes on the south side of a tree. .....the authority pulled them up on this too. If they can`t get bird box placement right what confidence should I have in the complexity of their flood risk assessments? Are we to be grateful for the proposed 2.5km of entirely fenced permissive paths, when we already enjoy 12 km of unfettered PROW`s, of which some will then be fenced. (East side of the Trent) To claim` Existing hedgerows will be retained `as a benefit EN010159 /APP/5.5 4.3.1 is an affront to the local population and an indication of the attitude of the applicant.	The Applicant conducted an extensive consultation process that complied with the statutory requirements of the Planning Act 2008 for preapplication consultation, as confirmed by the Adequacy of Consultation Representations that were confirmed by all five local authorities. Beyond these requirements, the Applicant went above and beyond to provide meaningful opportunities for consultation with technical bodies, elected officials and members of the community. As detailed in the Design Principles, the Applicant sought to balance competing demands to maximise energy production, while also protecting features and recreational paths that were important to the community, as well as protecting and increasing biodiversity.
WR73	Jonathan Burnett [REP1-125]	1. Views / Buffer / Offset Having reviewed the revised masterplan/map its clear there is no buffer around our property unlike other residential properties where land has been removed to protect residential views. Our property and land is completely surrounded on both sides with the solar panels located south up against our boundary line. As a result this will impact our current views of the open countryside and agricultural land, made worse in the winter when our trees and bushes are not in flower or bloom. To the north again with only the Sustrans cycle and walking route as a buffer our views again will be impacted especially in the winter months. Not only will the solar panels and inverters	The Applicant notes the same representations made during the Statutory Consultation. In direct response to this feedback, new offsets were introduced to protect residential views as explained in the Design Approach Document [AS-013]. Further information on the design approach to individual residential properties is provided at Appendix F of the Written Summary of Applicant's Oral Submissions at the ISH1 (REP1-077). The fencing, lighting and CCTV will be controlled by specific measures secured within the following documents:

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		(see below) impact our views but we will also have to contend with security fencing again running along our boundary up to 2m high, potentially CCTV and light pollution from any lighting that will be added to secure and maintain the area whereas at the moment the area benefits from dark skies with limited light pollution or manmade infrastructure. Also from our kitchen window the view will be impacted by the panels as the field is higher than our land when looking south. Once fencing and panels are installed these will be seen over and above the trees that are currently in place. The lay of the land to the south and east of our property boundary will see large variances in the height of the fencing and solar panels. At some point the panels may be much higher than the proposed max height of the panel itself due the incline of the field towards the east, again having a significant impact on our view. Photos of our current views from the property at the bottom of this document. Also included are images of our property in the winter when everything is not in full bloom which opens up our views of the countryside even more	• Outline Construction Environmental Management Plan [REP1-047] • Outline Operational Environmental Management Plan [REP1-049] • Outline Decommissioning Environmental Management Plan [REP1-051] With regard to the solar PV site, The Applicant can confirm that: • Fencing around the solar PV site perimeter will comprise a stock proof mesh-type security fence with wooden posts up to 2m in height. • Only mobile task-specific lighting will be used in the event of an emergency requiring night-time working or panel cleaning operations. • The CCTV system will be mounted on towers measuring approximately 4m tall and spaced around the perimeter of the operational areas of solar PV site every 50m along straight sections and every change in direction to the fence. • The CCTV will use thermal imaging and infrared lighting to provide night vision functionality meaning that no visible lighting will be needed for security.
WR74	Jonathan Burnett [REP1-125]	2. Inverter Positioning The masterplan shows five small black lines, two groups of two and one single line that runs parallel with our property boundary to the south going east. There is no key to highlight anywhere in the masterplan what these black lines denote. However, asking at the in person	The Masterplan provided as part of the Applicant's proposed development is indicative only and intended to illustrate the broad layout of infrastructure. The locations of the Inverters (referred to as Power Conversion Stations (PCS)) are defined more precisely through the Outline Design Parameters [REP1-021]. This document sets constraints to

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		consultation we have been informed that these black lines are in fact inverters. The consultation document makes very little reference to these inverters, some research online and speaking to the team at the consultation it appears these inverters can reach up to the size of a 40ft shipping container, meaning 5 x 40 ft shipping containers running alongside our property with no buffer at all, these will be the closest infrastructure to our boundary. What considerations have been made for both the visual impact and the sound impact these will have that operate 24/7? Has OneEarth collected data from similar installation locations and completed a noise assessment to assess against the relevant standards, such as BS 8233:2014 and BS 4142:2014. The purpose of this is to ensure that the development is compliant with the National Planning and Policy Framework and Noise Statement for England. How will OneEarth guarantee these five inverters are compliant and have no impact on our way of life including health and wellbeing when we want to enjoy our garden but faced with noise pollution and visual impact.	minimise impacts on nearby residents. Specifically, it states: "Where practicable PCS units will not be located within 100m of residential dwellings and 50m of existing public rights of way and in all cases will be designed to ensure a night time noise rating level at residential receptors of no greater than 35dB(A)." It also limits the maximum dimensions of PCS units to reduce visual impacts. The Applicant confirms that a noise assessment has been undertaken in accordance with relevant standards, including BS 8233:2014 and BS 4142:2014, and the findings are presented in the [APP-044]. These assessments demonstrate that the proposed PCS units will operate within acceptable noise thresholds and comply with relevant policy. The Applicant remains committed to refining the layout during detailed design and will continue to engage with local residents to ensure that concerns around visual and acoustic impacts are appropriately addressed.
WR75	Jonathan Burnett [REP1-125]	3. Site Access Road A series of site access roads are to be built again alongside our boundary to the south which appear to be to service the inverters and ongoing maintenance of the site. What size do OneEarth propose these roads to be? How regularly will they be accessed? By what type of vehicle during construction and ongoing day to day maintenance such as cleaning?	The access tracks will provide service access during the operational phase and will be 4m in width as a minimum. Widening at corners and junctions will be present to allow safe negotiation. During construction, Light Goods Vehicle (LGV) and Heavy Goods Vehicle (HGV) traffic would use the tracks. During the operational phase, maintenance traffic will be limited and generally undertaken by LGV undertaking routine checks, cleaning, site maintenance and environmental management. There may need to be occasional HGV

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			access, in the event of a major component failure, but these are considered to be rare events during the lifetime of the Proposed Development.
WR76	Jonathan Burnett [REP1-125]	4. Main Road Traffic - Construction Phase There are three proposed site access points on the A1133 for One Earth construction traffic. The A1133 can, at times become very busy with a mix of general traffic and agricultural traffic. Will your traffic plans look to apply for the reduction in the national speed limit around the main site access points to assist with traffic calming and cope with the additional construction traffic during the construction period?	Each access point off the A1133 has been designed to facilitate the safe access and egress off the Local Road Network, with each junction having accommodated visibility splays in accordance with the Design Manual for Roads and Bridges (DMRB) CD 123 for national speed limit roads. Of the three access points only two would be utilised during the construction phase, with Access 5 being for operational use only. The location of these access points, and the respective design of the access proposals can be viewed as part of the Streets Rights of Way and Access Plans **[APP-015]**.
WR77	Jonathan Burnett [REP1-125]	5. Heritage Impact Clifton on Trent Station and the Station Masters house (called North Clifton Station in the One Earth Chapter 11 Cultural Heritage May 2024 documentation) is treated as a heritage asset by the Local Planning Authority. Both buildings form a group within the property boundary, being contemporary in architectural form and significant in terms of function. As a result the buildings have historic and architectural interest and complies with the principles set out in the NDHA criteria, heritage polices within the LDF and s16 in the NPPF should be considered. The significance of a heritage asset derives not only from its physical presence and historic fabric but also from its	North Clifton Station has been identified as a non-designated heritage asset and assessed within the Cultural Heritage ES Chapter [**APP-039**, paras.10.6.101 - 10.6.103] and the Cultural Heritage Desk-Based Assessment [Part 2, **APP-128**, pp.103-104]. In line with the methodology for assessment (agreed with the relevant local authorities), it has been identified as having a very low - low value (significance) and a low-medium magnitude of change during operation, leading to a negligible adverse effect (minor degree of harm, not significant in EIA terms). As set out in **APP-039**, for any harm to non-designated heritage assets, NPS EN-1 (5.9.33)

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		setting. Proposals may impair the setting of heritage assets and can compromise the visual amenity of the wider landscape, detracting from the historic character and sense of place. Has any consideration been given to the historic and architectural significance to the properties in relation to the solar farm? Looking at the revised Master Plan we fear not.	and NPPF (216) require balanced judgement with regard to scale of harm or loss and value.
WR78	Jonathan Burnett [REP1-125]	6. Sustrans - Skellingthorpe Walk The former railway track which runs to the North of the property boundary is now an active cycle and walking track. The revised master plan does not highlight this on the map but is a significant local asset used by locals and visitors to the area, connecting North Clifton and surrounding villages directly to Lincoln City Centre almost traffic free. What plans do One Earth have to maintain the usage of the route with no impact on access?	As detailed at paragraph 3.1.3 of the Outline Public Right of Way Management Plan [REP1-061], the existing National Cycle Route 647 (also referred to as the Skellingthorpe Walk) is to be retained during construction. In many places where an interaction may occur, the National Cycle Route is either grade separated or runs on an existing carriageway, whereby any construction vehicle wishing to egress onto said carriageway would give way to road users and cyclists.
WR79	Jonathan Burnett [REP1-125]	7. Property Values What studies have been carried out by One Earth to understand the impact on property values as a direct result of a project of this scale for similar projects elsewhere in the country? If no studies have been carried out to date i request the study commissioned called 'The effect of Botley West Solar Farm on local house values' by David J. Rogers, MA, D.Phil. (Oxon) is reviewed and a similar study applied for this project. That said, data from Lawrence Berkeley National Laboratory (a US study) found that houses within a half-mile of a utility-scale solar farm have resale prices that are, on average, 1.5 percent less than houses that are just a little farther away. This is a concern for our future property value after investing significant savings and time to our home.	The Applicant has reviewed the paper that was produced about the Botley West project, and consider that this is not a peer-reviewed study. As the written representation explains, there are other studies that have found little to no impact on property values. This is due in large part to the fact that housing values are impacted by numerous factors. Throughout the development process, the Applicant has sought to reduce potential visual impacts, noise impacts, or other factors that could impact local properties and affect house values, as described in the Design Approach Document [AS-013].

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WR80	Jonathan Burnett [REP1-125]	8. Accommodation Business On our property we operate a small holiday let in the former Weighbridge. The outdoor area for visiting guests has been designed to allow guests to relax with a view over the farm land. There will be no view other than looking at the rear of a row of solar panels which will have a significant impact on our guests. This coupled with the noise from inverters and light pollution will impact our income of the holiday let. We have spent months getting the Weighbridge into a position to let out and pride ourselves on the guest experience, the plans will essentially ruin this for our guests and ultimately our business.	The Applicant acknowledges this Written Representation and the points raised in regard to potential impacts from the location of solar panels, noise and light pollution. Throughout the development process, the Applicant has sought to reside potential visual impacts, noise impact or other factors that could impact local properties, as described in the Design Approach Document [APP-171]. In regard to landscape and visual mitigation, measures have been implemented at this location to reduce potential visual effects as detailed within the Illustrative Masterplan. Views from The Station including the former Weighbridge are located within a slight cutting at grade with the disused railway. Views are principally orientated to the east and south. A view corridor has been included to the north of the dwellings here to retain an open land, with solar arrays set further into the field. An offset to the north and south of the Station curtilage has been incorporated in response to the existing easterly views. This will take the form of species – rich grassland planting. Existing vegetation screening will be retained, along with existing hedgerows which will be trailed and enhanced. This is detailed within the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1, Appendix F Sheet 14 of the residential assessment and design response [APP-077]. It should also be noted that Figure 11.6 of the Landscape and Visual ES Chapter [AS-017] demonstrates that the location has low potential visibility of PV panels with screening in place. In regard to potential noise impacts to the property, Chapter 15 of the ES [APP-6.10] acknowledges that inverters situated in proximity to the proposed solar arrays will generate some noise. The location of PCS units will be determined during

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			the detailed design stage and in most cases PCS units will be at least 200m from residential properties. Where this is not feasible, noise levels from the PCS will not exceed the limits outlined in the ES chapter, and additional noise mitigation will be provided to ensure this is the case. During construction, the noise assessment identified The Station as a receptor which may experience construction phase piling. This construction activity will only take place for a short period of time and therefore the mitigated impacts are minor and not significant. In regard to lighting, the use of lighting during construction will be controlled by the implementation of the CEMP to minimise intrusion during this period [APP-7.4.1]. During operation, solar PV areas will not require artificial lighting other than during temporary periods of maintenance and repair. The implementation of any lighting during operation will be controlled through measures outlined in the OEMP [APP-7.5.1]. It should also be noted that the former North Clifton Station is a non-designated heritage asset. the Cultural Heritage assessment [APP-127] at paragraph 10.6.102 notes that the Proposed Development will not affect the connection to the former railway and it does not rely upon an agricultural context to appreciate its value. Any potential effects can be mitigated through the retention of existing vegetation, implementation of setbacks, and hedgerow strengthening.

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WR40	Rebecca Walker [REP1-127]	1. Inconsistent and Conflicting Information on Inverter Placement and Noise Impact There are major discrepancies between what has been said by the applicant at hearings and what has been submitted in formal documentation: • At the Open Floor Hearing (8 July 2025), the applicant claimed that inverters would be located no closer than 100m to residential dwellings and 50m from public rights of way (PROW), unless acoustic mitigation is used. • However, APP-158 (Appendix G-2.4 – Statutory Consultation booklet, Page 68) stated that noise-emitting infrastructure (like inverters) would be at least 300m from properties to avoid any significant impact. • APP-044 (One Earth Solar Farm Environmental Statement Volume 2: Chapter 15: Noise and Vibration). I respectfully refer the ExA to Pg 25 Operation and Maintenance, point 15.5.6) states that PCS/inverter units are likely to be 200m from properties, with potential to be closer if "not feasible." These contradictory statements undermine public confidence in the scheme and its supposed mitigation measures.	Noting the concerns raised by Mrs. Walker at Open Floor Hearing 1 and Issue Specific Hearing 1 regarding the information presenting distances from residential properties from noise emitting infrastructure, the Applicant has considered the references provided and has provided clarifications on these as a post hearing note in the Written Summary of Applicant's Oral Submissions at the Open Floor Hearing 1 (Item 2.4, page 4-5 [REP1-076]).
WR41	Rebecca Walker [REP1-127]	2. Lack of Clarity on Noise Mitigation The applicant frequently references "acoustic mitigation" without explaining what that entails. Residents have not been given sufficient information on: • What mitigation measures will be used, • How effective they will be, • Why the previously stated 300m distance has been reduced.	The draft DCO [APP-007] includes, as Requirement 16, a requirement to control operational noise levels ensuring noise levels at noise sensitive receptors are appropriate and compliant with the operational noise rating levels as set out in Chapter 15 – Noise and Vibration of the Environmental Statement [APP-044]. It is not possible to provide precise details of the noise mitigation measures that will be required at this stage, since the degree of mitigation that is necessary will be dependant on the final design of the development.

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		Given that the applicant's own documents (APP-158) claim that inverter noise could travel up to 300m, locating them closer than this, even with undefined "mitigation", is unacceptable and potentially harmful to residents. 3. Request for Clarification from the Examining Authority (ExA) Given these contradictions, I respectfully ask the ExA to request the following from the applicant: 1. A definitive statement on minimum enforceable distances from residential properties and PROW. 2. An explanation as to why information presented to the public (such as APP-158) differs from recent technical statements. 3. A detailed, transparent noise mitigation strategy if these minimum distances cannot be maintained.	However, any noise mitigation measures that are necessary in order for Requirement 16 to be achieved will be included in the final design of the development to ensure compliance with the DCO. Please see the response to WR 40 for further clarification on setback distances from operational plant and equipment.
WR42	Rebecca Walker [REP1-127]	4. Criticism of Site Selection and Design The applicant's justification that "some adverse effects are inevitable" is not acceptable given: • The scheme is in a flood-prone area, necessitating increased panel height and worsened visual impact. • The applicant could reduce impact further but appears unwilling to do so, likely due to cost or convenience. • Residents most affected by the scheme, like my family, are not being meaningfully prioritised or protected.	In terms of the site selection, the Applicant undertook a site search within 10km of the grid connection point for suitable areas of land for NSIP scale solar development ('the search area'), driven by the desire to be as close to the point of connection as possible, 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. Further evidence that the site selected is the most suitable is also submitted at Deadline 2 in the form of the Sequential Assessment document. [EN10159/APP/9.15].

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			The inevitability of landscape effects is stated 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.*" The Applicant has continually sought to embed good design into the project, and evidence of the design's evolution is provided in the Design Approach Document [AS-013]. This has included removing land from the project that fell within flood zone 3b on receipt of the flood modelling results, committing to meaningful engagement throughout the design development, and providing tailored design responses to individual residential properties based on residential visits.
WR43	Rebecca Walker [REP1-127]	5. Failure in the Consultation Process The consultation process was inadequate and, in several instances, misleading. Key failures include: • No initial home visit pre the non-statutory consultation was made to my property despite its significant impact; contrary to claims made by the applicant. • Technical questions went unanswered during the non-statutory consultation. Many were not followed up in the statutory consultation. • Information has changed or contradicted earlier statements, including the project duration (40 years → 60 years → indefinite) and tree removal (initially denied, later confirmed).	The Applicant has conducted an extensive consultation process. The statutory consultation met the requirements of the Planning Act 2008, as well as the commitments of the Statement of Community Consultation, which was informed through consultation with the local authorities. This was confirmed by all five of the local authorities in the Adequacy of Consultation Representations. The Applicant also went above to beyond these requirements in order to create the opportunity for meaningful consultation with the local community, technical bodies and elected officials. This included a non-statutory consultation period with a series of door knocks to many (but not all) properties near the project boundary, five in person events and one webinar, meetings with the parish councils,

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		• The applicant has been unresponsive to written questions and failed to follow up on safety complaints (e.g., blocked single-track roads). • The inverters, despite public concern, have been removed from the plans entirely to avoid scrutiny, increasing anxiety for residents. • Community benefits have not been clearly defined — unlike in other NSIP projects, making any proposed benefit feel insincere. • Photographic material used by the applicant is misleading, downplaying the real visual impact on nearby homes. • 3D visualisations were inadequate and incomplete at the initial statutory consultation meeting, causing distress and failing to properly represent future screening, which will take over 15 years to mature.	and 14 visits to local properties, including Mrs Walker, as described in the Consultation Report [APP-151]. All questions that were received were acknowledged and responded to with the best available answers at that time. In accordance with best practices, guidance and other requirements for preapplication consultation, the Applicant conducted consultation at an early stage of the project's development. This meant that some detailed, technical questions could not be answered at the first consultation, due to the early stage of the project's development. Similarly, while more information was available at the second consultation, there were still some detailed questions that could not be answered due to the project's ongoing development. In particular, the second consultation presented the preliminary results of the Environmental Impact Assessment, and by definition, this meant that the final results of the EIA were not available at that time. This allowed for consultation to help inform the final results that were submitted in the DCO. The iterative nature of the development process was explained by the Applicant throughout the project's preapplication consultation period. Regarding the lifespan of the project, 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

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			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. To confirm, the Applicant has applied for a 60-year consent, not a consent for an indefinite timescale. There have been no changes to the tree removal strategy between consultation and submission. At statutory consultation, it was clearly stated that existing tracks and field access points across the Site would be utilised wherever possible, and that where new access is unavoidable, lower-value habitats would be prioritised. Similarly, existing trees and hedgerows will be retained wherever feasible and protected in accordance with best practice (BS 5837). Where removal of such features is unavoidable, lower-value features will be selected in preference to higher-value ones. These commitments are also set out in Table 6.6 of Chapter 6: Biodiversity [REP1-023]. The Applicant responded to all questions and feedback within a reasonable response time. The inverters were included on the draft masterplan at the statutory consultation in indicative locations. In response to feedback from this consultation about concerns that the inverters would create noise impacts on local properties, the Applicant included a night-time noise limit of 35dB and clarified that inverters would be located no closer than 100m from homes where possible. Because the final locations of the inverters will be based on this noise limit in the final

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			detailed design, the Applicant updated the masterplan to remove their indicative locations to reduce confusion. The Applicant has committed to a community benefit package to provide local benefits, which will be design in collaboration with the community if the project is consented to ensure it supports local priorities and initiatives. In addition, the Applicant has already made funds available through an initial fund, which are providing benefits now. Throughout the preapplication consultation period, the Applicant sought to incorporate visualisations to help the public understand the potential visual impact as best as possible. This included commissioning a local photographer to take photos of the project site as well as an operational solar farm that had been developed and constructed by PS Renewables, one of the Applicant parties. This also included the use of stock photography to demonstrate the rough layout and appearance of a solar farm. During the statutory consultation, the Applicant commissioned a 3d model of the proposed development, that showed the development both with landscaping and without including details such as the maximum height of the panels and other components.
WR44	Rebecca Walker [REP1-127]	6. Neglect of Residents' Views and Site-Specific Impacts • APP-151, which records site visits to my home, misrepresents the discussion and omits key concerns raised by me and my husband. • The design has not mitigated loss of key views from our property — we are left with 3.5m high panels only 40m from our boundary.	The Applicant has provided further detail at Deadline 1 explaining the assessment and design approach to individual properties at Appendix F of the Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-077]. With regard to Mrs Walker's property, the design has sought to minimise visual impacts by excluding development on land north and south of the dwelling, in line with the orientation of

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		• In some areas, PROW are better protected from panel proximity than our family home, which is entirely unjust.	principal views from the property. The proposed solar panels to the north east have also been set back following consultation to further reduce visual impact of views. In the intervening area, new planting is proposed in the form of hedgerows and trees, while existing hedgerows will be retained, enhanced and positively managed to provide further screening. The closest panels proposed would therefore be located east of the property, approximately 100m from the residential dwelling and approximately 50m from the property boundary and it is anticipated that the visibility of the panels will reduce overtime as the planting establishes and matures. The planting will be established in line with the Outline Landscape and Ecology Management Plan [REP1-053]. The iterative design development in relation to the property is shown within the Design Approach Document [AS-013] (page 56). A photomontage from the property showing the view at year 15, accounting for the establishment of vegetation, is shown on page 57.
WR71	Stephen Fox [REP1-131]	I am submitting two representations on relating to the Preliminary and Open and Issue Specific meetings and a second relating to the project as a whole and the Flood Risk Assessment. Stephen Fox Resident of North Clifton Summary representation regarding the proposal as a whole. The conduct of the One Earth team has been dishonest in the way they have conducted their consultations, and in	**Consultation** Throughout the development process, the Applicant has made an effort to not just meet the statutory requirements for consultation, but to go beyond these minimum statutory requirements to create meaningful opportunities for consultation with the community, technical bodies and other stakeholders. Best practice for consultation is that it should occur early in a project's development, at a time when feedback could result in changes to the project. This means that the answers to some questions might not be available, because they are dependent on assessments or decisions

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		the Consultation Report to an extent that renders them unfit to be granted approval to provide a National Infrastructure project. See my submission regarding the Preliminary Meeting, Open Meetings and Issue Specific Meetings. The proposal is prepared on the well-known technique of studying the requirements of the examination and then providing the answers needed to pass it irrespective of facts and only including research that supports the proposal and ignoring that which gives a contrary view. For example, research regarding flood risk and soil degradation as detailed in my comments on the FRA below and in maintaining that there is no research that indicates that the destruction of an environment will not have an impact on local house and property prices when answering the local community queries. The project fails to take account of current science, and the modelling provided is inadequate and ignores the guidance provided by the Environment agency regarding third party use of its modelling. The purpose of the Overarching National Policy Statement for Energy EN1 section 5.8 is to steer national infrastructure developments away from flood plains. An exception test is provided for use in exceptional cases where the benefits claimed for the proposal cannot be had by choosing a location other than on a flood plain. Consequently, before the One Earth proposal can be approved it must first demonstrate that the benefits of providing green energy cannot be had by proposing their development on an alternative site which is not a flood plain. It is for the proposal to demonstrate that connecting at High Marnham is a necessary condition for providing	that have not yet been made. Throughout this period, the Applicant explained this process, and explained that if a specific question could not be answered at that time, why that was the case and when they answer would be available. The Applicant appreciates that there are a number of detailed questions that the community asked that could not be answered in detail because of this iterative process, and has been honest and open about this throughout this process. **Flood Risk** *Planning Policy within FRA* Section 2.1 of the FRA [AS-051] simply provides a summary of the relevant NPS Policy with regards to flood risk, it does not intend to provide justifications for the location of development within the floodplain or any associated mitigation.

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		green energy before use of the exception test to justify building on the flood plain can be considered. They have not done this. Consequentially the proposal should not be approved. The availability of a connection to the national grid at High Marnham is not necessary or sufficient reason to justify building on the flood plain unless all alternatives to provide green energy to the level that the proposal will provide have been explored, and it has been demonstrated that it is the most cost-effective way of making such a provision. This the proposal does not do. Even if it was accepted that the availability of the connection at High Marnham was a necessary starting point (which it is not), the proposal could only be justified using the exception test if a full quantified cost benefit analysis of the proposal compared to the possible alternative sites was presented. The benefits of providing green energy would be excluded from such a comparison as they are not unique to the site. There is no limitation on the distance that the sequential search for an alternative site should involve. The only limitation would be the relative cost of the alternatives. No such cost benefit analyses have been provided so the proposal cannot be properly evaluated. Qualitative arguments alone are not sufficient. This is101 economics. No connection to the National Grid at High Marnham is presently and , and there is a probability that one won't be available any earlier than elsewhere. It is for the proposal to demonstrate that connecting a High Marnham is a necessary condition for providing green energy before use the exception test to justify building on the flood plain can be considered. This they have not done.	However, in terms of planning policy compliance, the Applicant has prepared further evidence to demonstrate how the Sequential Test has been applied and satisfied as part of site selection, arising from discussions during the ISH1 and within the Local Impact Reports. The Sequential Test Assessment [EN010159/APP/9.15] which has also been submitted at Deadline 2 demonstrates how it has considered reasonably available, lower risk sites that are appropriate for the Proposed Development and provided further evidence to justify the 10km search area. A sensitivity test has also been undertaken to extend this search area to 15km to address comments raised during the examination and in the Lincolnshire LIR. The additional evidence demonstrates that there are no reasonably available, lower risk sites that are appropriate for the Proposed Development in the extended search area. The document also sets out how the Exceptions Test has been met. *Modelling* The EA hydraulic models assess flood risk at a river catchment scale and this is why in certain situations they are not considered suitable to assess third party developments at a smaller scale. On the basis that the One Earth Order Limits cover an area of 1,409 hectares, it is considered acceptable to utilise the EA hydraulic modelling. For clarity, the outputs from the EA modelling have been used to determine the height above ground that the solar panels need to be raised in order to be above the design

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		Both the first and second elements of the exception test have not been past. Representation regarding Document Reference: EN010159/APP/6.21 Revision 01Volume 6.0 Environmental Statement [EN010159] Volume 3: Technical Appendices Supporting ES Volume 2 Appendix 7.2: Flood Risk Assessment (FRA) and Outline Drainage Strategy February 2025. When asked at a meeting on 1st August 2024 what the incremental flood risk of the project to the local community was forecast to be the author of the assessment replied with “well there won’t be any more water”. This attitude has been carried forward into the way in which the FRA has been prepared and presented. In paragraph 4.2.1 of the FRA, and throughout the proposal, Wallingford Hydro Systems are used as an absolute authority that solar farms do not result in significant increases in run off when there are properly modelled scientific papers readily available that clearly demonstrate that solar panels increase volumes of run off, increase peak run off by 11 plus times and increase the speed of run off by between 2 and 3 times. See for example (https://onlinelibrary.wiley.com/doi/10.1002/hyp.15053 Hydrological Processes Volume 37, issue 12, December2023).(https://www.researchgate.net/publication/362427501_Evaluating_the_potential_impacts_of_solar_farms_on_hydrological_responses#:~:text=area and studied multiple scenarios, models that can accurately) (En3 is out of date in this respect and should be revised). This calls into question the claims and assumptions regarding soil, in addition to those made regarding	flood level. The use of the model data was discussed with the EA in a number of meetings and it was agreed that non modelled quantified methods could be used to assess impacts of floodplain storage as a result of the Proposed Development. With regards to cumulative effects, one fundamental requirement of Flood Risk Assessments is to ensure that there will be no increase in flood risk to the site or surrounding area. It is concluded therefore that there should be no cumulative impact as a result of the proposal or other proposals in the vicinity. *Structural Design and Floodplain Storage* For the purposes of informing the potential impacts on flood storage capacity and debris impact, a structural assessment to determine a typical design of the panel mounting structures and inverter voided structures (within the design flood extent) has been undertaken. This assessment takes in to account the likely velocity of flood flows and potential debris impact and has been used in assessing flood storage capacity. For clarity, the structural assessment undertaken and details summarised in the updated FRA (submitted at Deadline 2) considers worst case assumptions (in terms of flood depth, velocity and potential debris impact) and is the most robust structure anticipated. However, at detailed design, area specific conditions and likelihood of debris impact will be considered so that efficient sizing of structural features can be undertaken. The structural assessment undertaken to determine a typical design indicates that the panel mounting structures and

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		flooding, made in the proposal On a project of the size proposed to be built on a flood plain, One Earth should be taking a scientific approach and not relying on outdated received wisdom. There is no attempt to model the incremental impact of the project, which reflects its scale, or of the cumulative effect of the proposed project and the 5 others, of similar size in the Trent Vally area, on the flood risk to the communities in the Trent Valley and beyond. There is no attempt to model the impact of the proposal when surface water flooding and river flooding coincide which has happened twice in the North and South Clifton Areas in 2000 and 2024. A significant element of the surface water flood risk to North Clifton from the proposal has been excluded. See Mrs Sheila Pumfry's submission to the Inspector. On a project of this size, compounded by numerous similar projects in the catchment area of the river Trent and the geographical area of the Lincolnshire and Nottinghamshire reaching as for as Sleaford in Lincolnshire, extensive research should be conducted on the wider implications of the research and modelling referred above before the project is approved. The implications of the additional volumes of runoff, increase in peak run off and increase in speed of run off are not fully understood but the potential for downstream flooding from the solar farms are substantial given the scale of projects under consideration. The Environment Agency states, on their website, that whilst their flood risk modelling is the best available, it is not to be used by 3rd party developers as suitable for their proposals and developers should conduct their own modelling.	inverter voided structures can include a clear span between columns, thereby minimising the potential for blockages to occur and allowing free flow of water. The typical span dimensions are set out below for clarity: • Voided Inverter Structures – 2.4m span along width and 6m along length • Panel Mounting Structures – 3.2m span along width and 6m along length. As part of the structural assessment uplift forces due to flooding conditions were also considered and it is confirmed that typical panel connections would be sufficient to withstand flow conditions without detaching. It was agreed with the EA that hydraulic modelling was not required to support the application but that other quantified methods could be used. With this in mind, turbulence due to structures within the floodplain has not been assessed. However, the maximum velocities in the 1 in 100 year plus 62% climate change event (i.e. maximum credible scenario and greater than the design event that policy indicates should be used) have been reviewed in the structural assessment to inform the flood storage impact assessment. Furthermore, the velocity designed for at this stage was also conservative in that 0.9 m/s was chosen when in reality, the majority of panels within the floodplain would only experience up to 0.4 m/s. Within the updated FRA submitted with Deadline 2, an assessment of the impact on flood storage capacity has been undertaken which now considers the panel mounting structures, partially submerged panels and the inverter

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		"Environment Agency models are not designed to assess third party developments, so do not assume that they are suitable for your proposed development /even if you use a recent model, you still need to review and possibly update it /you should provide evidence of any modelling checks and subsequent updates you carry out and record these in the /FRA /model reporting" The models available are out of date and not suitable for properly evaluating the proposal and it is up to One Earth to have the modelling commissioned from independent third parties before the risk of approving this project (and any further projects) is taken. 5.8.15 of EN1 requires that FRA's be undertaken by competent people. Failure to use UpToDate models and to take account of UpToDate science suggests that this proposal falls foul of 5.8.15 of En1. When considering 2.1 of the FRA recourse should be taken to reading 5.8 of EN–1. The latter is designed (5.8.6) to steer developers away from building in high flood risk areas whereas the former seeks to bend its purpose to be that of justifying the building of projects in flood risk areas. The FRA fails to consider the flood risk to the local community and simply focusses on the flood risk to the project. There is no quantification of the incremental flood risk to the local community or the timing of such incremental changes. This is contrary to 5.8.6 of EN1. The project should not be being proposed on the flood plain when there are ample suitable sites in the UK for such projects that will provide similar benefits in terms of transitioning to green energy, without involving construction on a flood plain. There is no requirement for the project to be localised as proposed to achieve the	voided structures. This assessment is considered to be conservative and confirms that in the design flood event increased flood depths of 4.1mm and 2.3mm could be observed to the east and west respectively of the River Trent. These increased flood depths are within the 5mm tolerance that the EA indicated would be acceptable as this is within model tolerances. The impact on flood risk is therefore considered to be negligible. *Assessment of Flood Risk and Proposed Mitigation* The FRA [AS-051] produced outlines that a sequential approach has been taken to the Proposed Development by locating sensitive electrical equipment (BESS and Sub-Stations) outside of the design flood risk extent and includes mitigation in the form of raised panels to both provide protection to the panels themselves but also allow flood flows to continue. The Proposed Development has been designed to be (and would be constructed to be) operational and safe for all events up to the fluvial design flood event (i.e. 1 in 100 year probability plus 39% climate change). The likelihood of a combined surface water and fluvial event occurring at the same time and to the same extremity of the design flood event is considered to be extremely low. Individual figures showing surface water flooding and fluvial flooding are shown within the FRA [AS-051]. *Maintenance and Existing Flood Defences* It is not intended that maintenance activities or inspections be undertaken whilst a flood event is occurring. Due to safety, it is indicated in the FRA [AS-051] and responses to the relevant representations (RR.063 within [REP1-075]),

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		benefits claimed for the wider community. Consequently, the project is in breach of 5.8.7 of En1. Why is it necessary to locate it in the proposed location? The word necessary implies an absolute need to location as proposed. This clearly is not the case. The benefits of the project are green energy from solar. These benefits can be had by building the project in any area of the county where there is low flood risk. Further, building on a high-risk flood area not only needs to be necessary but it has to be exceptionally necessary, which must be a stronger test. It cannot be the latter if it isn't necessary in the first place. 5.8.8 of En1 requires that this project proposal be rejected by the inspector unless all alternative sites within Great Britain which could provide similar benefits in low flood risk areas have been examined and rejected. No proper attempt appears to have been made to make a case as to why the project should be located as proposed. The statement that the proximity of the High Marnham national grid connection is the governing factor for the location of the project would appear to be misleading as One Earth have not secured agreement for such a connection. Even if they had such an agreement, a justification would require a comprehensive cost benefit analysis of the proposed project compared to alternatives proposals that do not involve locating solar panels at scale on a flood plain. It would be incumbent on One Earth to provide a comparison with building such a project on every possible site in the UK that is not a flood plain. Only if it was shown that the project had clear benefits to the wider community, which the alternatives do not have, should consideration of sequential and exceptional tests become relevant. Such benefits should have their value	that any required inspections or maintenance will be undertaken following a flood event and immediately once flood water has receded. The existing flood defences in the vicinity of the Site are predominantly embankments which are noted by the EA to be in a fair to good condition (the only exception to this is the Fledborough Embankment which is shown to be in poor condition). Based on the flow conditions of the River Trent at this location (i.e. relatively low velocity of flows), it is not anticipated that debris impacts to the flood defences would cause damage. However, surveys of the existing defences are to be undertaken at detailed design and the potential impact from debris to the defences would be assessed at this stage. It is understood that the EA conducts regular inspections of the existing flood defences however, as riparian owners of the defences within and adjacent to the order limits, the applicant will undertake their own inspections of the defences, particularly following a flood event. *Competency* The reports and calculations are undertaken and reviewed by suitably qualified consultants. Furthermore, reviews are undertaken by the statutory consultees (such as the Environment Agency and Lead Local Flood Authorities). **Surface Water Drainage Strategy** Although there are research papers that conclude there would be an increase in surface water runoff rates and volumes, these do not take into account changes in ground

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		quantified as qualitative statements are insufficient to justify the risks to the local and wider communities. The benefits of the building on a flood plain need to be unique to the site to be exceptional for the project to be justified under the exceptional test. The benefits cannot be unique and exceptional if they can be had by building elsewhere. For the High Marnham connection to be a governing factor a comparison of the cost of securing an alternative connection would need to be presented, e.g. by expediting the expansion of grid capacity away from the flood plain. Under 5.8.9 of EN1 in the absence of the definition of "possible" it must be taken as meaning capable of existing, happening, or being done as per the Oxford English Dictionary. Consequently, it is clearly possible to locate the proposed project elsewhere. There is no justification for even considering the sequential test in the context of One Earth's proposal. The purpose of the "Application of the sequential approach in the plan-making and decision-making process will help to ensure that development is steered to the lowest risk areas, where it is compatible with sustainable development objectives to do so, and developers do not waste resources promoting proposals which would fail to satisfy the test". One Earth are attempting to use the sequential and exceptional tests to steer their project to the flood plain. This developer is wasting its own resources and those of the Inspectorate, the local authorities and the local community. 5.8.9 requires the developers to search for alternatives for their proposal and there is no limit to the extent of the search area.	cover (such as the differences in bare soil and vegetated cover). The existing uses within the Order Limits are predominantly agricultural and therefore consists of bare soil cover for significant periods of the year. As part of the development, it is proposed that this bare soil be replaced with a species rich grassland beneath the PV panels, field margins and buffer zones/habitat management areas. The research referred to within the FRA [AS-051] (Cook L.M. and McCuen R.H (2013, Hydrologic response of Solar Farms. Journal of Hydrologic Engineering 18: pp 536-541), includes greater assessment on how changes in ground cover can impact runoff rates and volumes and concludes that "*With well maintained grass underneath the panels, the solar panels themselves do not have much effect on total volumes of the runoff or peak discharge rates."* This research is therefore considered to be most relevant to the development proposals. For clarity, the species rich grassland will consist of a diverse seed mix, including shade tolerant species and species capable of thriving in waterlogged soils, ensuring sufficient cover irrespective of the conditions. Furthermore, the oLEMP [APP-179] sets out establishment maintenance measures and long term management to ensure that the proposed grassland is maintained. Additionally, and as set out in within Section 4.2.1 of the FRA [AS-051], it is proposed that strategic SuDS features such as filter drains, swales and basins/scrapes are incorporated

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		Referring to 5.8.11 of EN1, this project does not provide any sustainable benefits to the local community or to the wider community that cannot be obtained by locating it elsewhere so the claimed benefits cannot outweigh the flood risk. It has not been demonstrated that the project will not increase the flood risk locally or elsewhere. There are lots of statements of "it is considered that" without any attempt to substantiate the claims with new and up to date modelling which show not only the impact of the proposal but of similar projects which are in or impact on the Trent Vally drainage flows. 5.8.12 and 5.8.15 of EN1 require that the flood risk arising from the project should be considered. The proposal fails to do so. The volume of runoff will increase; peak runoff rates will increase by 11plus time and speed of run off by between 2 and 3 times greater. (seehttps://onlinelibrary.wiley.com/doi/10.1002/hyp.15053 Hydrological Processes Volume 37, issue 12, December2023). This will likely dramatically increase the chances of North Clifton flooding. (See for example Mrs Sheila Pumfrey's submission to the Inspectorate). 5.8.15 requires the FRA to Consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration. The work in the FRA is in adequate and out of date. (seehttps://onlinelibrary.wiley.com/doi/10.1002/hyp.15053 Hydrological Processes Volume 37, issue 12, December2023 and other similar papers. 2.6 of the FRA. Sequential and Exceptional Test. The justifications offered for site selection using the Sequential	within the solar array areas to encourage infiltration to the ground and also provide ecological and biodiversity benefits. The statement referred to by Mr Fox *"it is anticipated that surface water largely infiltrates to ground with any exceedance entering the land drains/ditches and watercourses"* provides a summary of the existing drainage regime at the site, where it is understood that there is no formal piped drainage network in place. **Soil Impacts and Vegetation Cover** An Agricultural Land Classification Survey was used to inform the pre-existing soil conditions across the site. These results were then used to avoid the Best and Most Versatile (BMV) land wherever practicable. Additionally, a soil management plan will be submitted in line with the DCO requirement which outlines specific mitigation to minimise the damage on soil such as avoiding working in wetter conditions, stripping and storing conditions of soil, sowing a grass sway at least six months prior to construction to prevent vehicle rutting and seeding soil bunds to prevent erosion and anaerobic conditions.

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		and Exceptional test ar the project. The comparative costs of costs of securing an alternative connection have not been presented. Quantitative statements alone will not do.There is no limitation to the distance defined as being required for a sequential test which means that any site in Great Britain could be considered. Further, somewhere in Great Britain there is probably an available connection that will supply the claimed benefits without placing solar panels on a flood plain. The sequential test should not simply contain the qualitive statements alone used in 2. 1 of the FRA or in EN010159/APP/5.5 The very least that would be credible for ruling out an alternative location should be a quantitative comparison of the merits of each such alternative. There are well established techniques regularly used by government departments and well described in economic literature for performing such cost benefit analysis. The exception test has not been past for this proposal as no benefits have been presented that are unique to placing the project on a flood plain so they cannot possibly outweigh the flood risk. Further, there is no proper and up to date modelling and quantification of the flood risk so that this can be properly assessed. The second part of the exceptional test has not been past because it has not been demonstrated that it is safe for its lifetime or that it will not increase the risk of flooding elsewhere. Mitigation or use of words such as negligible are inappropriate because “not increase” means zero in the context of the exceptional test. Elimination of any flood risk is what is required. The flood risk mitigation measures in the proposal are almost non-existent as they essential list what already	

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		exists and are entirely inadequate given that the met office saying that “extremes are the norm”. and the FRA provides no evidence that the development will not increase the flood risk. It has not been demonstrated the project doesn’t increase the flood risk locally or elsewhere. Any structure in a flood plain reduces the amount of storage and water finds its own level so by definition building on the flood plain will increase the flood risk elsewhere. This is especially the case since the site covers each side of a flowing river.Such structures become obstructions and will reduce the velocity of flow and hence will affect the degree of storage and attenuation within the flood plain. No information is provided by the applicant regarding what has been done to evaluate the changes in flood protection resulting from the structures being built on the flood plain. The panels in the flood plain will be subject to forces from the water. These will vary according to the flow rates. What studies have been made and what supporting calculations are available, and what return periods for the floods have been considered to ensure safety of the panels? How have the panel’s anchorage been designed? What forces have been considered? What uplift forces have been considered for different return periods? In flood conditions some panels may become detached. What assumptions have been made re the number of panels detached? What assumptions have been made with respect to increased turbulence in the area? What assumptions have been made with respect to impact damage and forces from floating debris? If units become detached what precautions have been made to enhance the protection of flood control structures in the flood plain?	

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		In the event of detachment of panels, on or near the flood plain, how will the damaged panels be recovered during peak flood, which can last an extended period, to prevent them causing local and downstream congestion and destruction which would have a multiplier effect in terms of enhanced to flood risk? A total flood displacement of 618.1m squared by panel supports does not equate to zero and makes no allowance fencing and other additions and the impact of damaged panels during flood events. Further there will be a cumulative effect with the 5 other proposals in the area. Combined these could have a major impact on surface water flooding. Where calculations have been performed, e.g. for the preparation of tables 3.2, who has checked the assumption and calculations made? How valid are the calculations in any event as One Earth have not finalised the structures to be constructed? The local community unanimously refutes the suggestion that “The Proposed Development also delivers local community and biodiversity benefits through biodiversity net gain and environmental enhancements” and the statement simply goes to show how inadequate the consultation process was and how inaccurate The Consultant Report is. One of the claimed biodiversity benefits is leaving existing hedgerows in place - the need to be so desperate as to include this as a benefit demonstrates that there are no real diversity benefits. Section 4 is entirely inadequate as it relies on 4.1 which states “it is anticipated that surface water largely infiltrates to ground with any exceedance entering the land drains/ditches and watercourses”. The lack of an	

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		understanding of the up-to-date science requires that all the work presented in this section needs to be redone. Section 4.2.1 is simply not credible and is out dated - see the first paragraph of this submission and https://onlinelibrary.wiley.com/doi/10.1002/hyp.15053 Hydrological Processes Volume 37, issue 12, December2023. Solar panels create an 11 times greater discharge rate and between 2 and 3 times increase in run off speed thereby dramatically increasing the risk of flood surges to the local communities and to the Trent Valley as a whole, if one considers the size of the proposed project area and the similar projects proposed in the Trent Valley area and throughout Lincolnshire and Nottinghamshire. This is especially relevant when Pluvial and Fluvial flooding coincide as in 2000 and 2024. Any increased flood risk could have resulted in properties that were on the verge of flooding being flooded. It also removes all credibility to the claim that the project will not increase the possibility of flooding on the site or elsewhere. How will the disturbance to vegetation be minimised? The whole site will be churned. Such a claim is not credible. How is disturbance of the vegetation to be minimised if the proposal is to remove and store the topsoil? On what will the vegetation grow and if it does grow will it be as robust as pre the project? How long will it take to come back? How will the vegetation be reestablished if the topsoil is removed?	

Appendix A TBC

one earth

solar farm