One Earth Solar Farm

Volume 9.0: Other Post-Submission Documents [EN010159]

Applicant Response to ExA's First Written Questions

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Contents

1. Introduction

1.1 Purpose of the Report

1.1.1 This report provides the Applicant's responses to the Examining Authority's Written Questions and requests for information (ExQ1) [PD-010] issued on 07 August 2025 in response of the proposed One Earth Solar Farm (the 'Proposed Development').

1.2 Structure

1.2.1 Section 1 of this report sets out the purpose and structure of this report and explains the approach taken by the Applicant in preparing responses.

1.2.2 Section 2 of this report provides the Applicants responses to the questions raised of the Applicant by the Examining Authority (ExA), including signposting to other responses and documents were appropriate.

1.2.3 Where questions have been raised of other parties, the Applicant has not provided a response to those questions except where it considers that it would be helpful for the ExA for it to do so.

1.3 Purpose of the Report

1.3.1 To minimise duplication, the Applicant has sought to cross-refer where appropriate to responses provided in other relevant submissions that have been entered into the Examination.

2. Responses to Examining Authority's First Written Questions

2.1 Overview

2.1.1 The following topics were raised by the ExA in the ExQ1:

- General and Cross-Topic Questions
- Design, parameters and other details of the Proposed Development
- The Environmental Statement (general)
- Need
- Site Selection and Alternatives
- Air Quality and Emissions
- Biodiversity, Ecology and Natural Environment (Including HRA)
- Habitats Regulations Assessment (HRA)
- Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations
- The draft Development Consent Order (DCO)
- Historic Environment
- Hydrology and Hydrogeology and the Water Environment
- Land Use and Soils
- Human Health
- Landscape and Visual
- Noise and Vibration
- Socio-economic Effects
- Transportation and Traffic
- Cumulative Effects

2.1.2 The tables below provide the Applicant's response to these topics arranged under the headings listed above.

ExA Q Ref	Respondent	Question Summary	Applicant Response
General and cross-topic questions			
Q1.0.1	The Applicant National Grid Electricity Transmission	**High Marnham Substation** 1. This substation would not yet appear to have consent. Please provide details of when it is anticipated an application will be made and provide as full explanation as possible how the timing of the application for the substation and the programme for this application is proposed to happen/coincide. 2. Are you aware of any potential impediments to the progress of the substation? 3. When is it anticipated the substation will be completed and the solar farm might have the ability to physically connect to the Grid?	The Applicant's position in relation to the grid connection at High Marnham substation is set out in the Written Summary of Applicant's Oral Submission at the Issue Specific Hearing 1 (ISH1) [REP1-077], at Agenda Item 6(1), pages 22 – 27, including the post hearing note. As recorded in the ISH1 written summary, and in response to part (1) of the question, it is correct that the High Marnham substation into which the Proposed Development intends to connect does not yet have consent. It is anticipated that an application for planning permission will be made by National Grid in Q4 of 2025. The Applicant has a grid connection date of October 2029, which National Grid has obligations to deliver on under its grid connection agreement with the Applicant. The Applicant's understanding is that National Grid is aiming to start construction in summer 2026, with a three-year construction window. In response to part (2) of the question, the Applicant is not aware of any potential impediments to the progress of the substation. The Applicant directs the ExA to its ISH1 written summary in particular from bottom of page 23, paragraph beginning "In terms of potential impediments …", and through to page 24 in which Mrs Price, DWD, on behalf of the Applicant set out the policy support for the substation. In response to part (3) of the question, as the applicant understands National Grid Plan to submit the planning application in Q4 2025. Their currently published programme indicates that construction will begin in summer 2026 and be completed in 2029. The Applicant anticipates that the physical connection to High Marnham could occur in the 12 months preceding October 2029, when energy generation would begin.

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Q1.0.2	The Applicant National Grid Electricity Transmission	**Connection to the National Grid** 1. In order to understand the offer made – can both National Grid and the Applicant provide details of the steps to be taken in advance of any construction works. 2. Where does this proposal fit within the Grid Prioritisation assessment/exercise that the ExA understands is underway (announced by the SoS for Energy Security and Net Zero) on 15 April 2025? (https://www.gov.uk/government/news/clean-energy-projects-prioritised-for-grid-connections) 3. Are there further legislative steps required to facilitate the change in prioritization/ or to remove 'zombie' projects from the connection list? If this is the case please explain what these might be, and when it is anticipated that this legislation/change in regulation might occur? 4. Would any of these changes influence the proposed connection date?	Applicant Response: 1. The grid connection offer requires the Applicant to submit the planning application, gain consent and achieve Final Investment Decision (FID) by key milestone dates in order to maintain the validity of the offer. There are no additional steps that the Applicant must make to begin construction of the development. 2. Due to the fact that the application for development consent for the Proposed Development was submitted in 2025 it fell within the Grid Prioritisation assessment window and the Applicant was, as such, required to submit an application to gain a Gate 2 offer (a firm offer of location, and import/export 3. 4. capacity). The Applicant has submitted this Gate 2 offer. Given the advanced nature in agree options and the planning process the Applicant has high confidence that it will receive a Gate 2 offer. Based on current available information, the Applicant expects to receive the full Gate 2 offer by January 2026. 5. The Applicant is not in a position to answer this question and defers to NGET. 6. The Applicant is not anticipating that anything set out in response to this question would change the anticipated connection date (for the reasons addressed in the Written Summary of Applicant's Oral Submission at the Issue Specific Hearing 1 (ISH1) [REP1-077], at Agenda Item 6(1), pages 22 – 27). If there was a delay in the construction and completion of the National Grid High Marnham substation, or a delay to the connection date resulting from the Gate 2 process (as above, in both instances, the Applicant's position is that this is unlikely), the benefits brought forward by the Proposed Development, if it was to connect later than the current proposed connection date, would be no less than the benefits arising from the Proposed Development connecting at its current connection date. Further, the Secretary of State should assess all applications for development consent for the types of infrastructure included by the NPS (including solar) on the basis that there is demonstrated urgent need for

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			them, that substantial weight should be given to this need, and that the Secretary of State is not required to consider the specific contribution of any individual project to be satisfied that need is established (NPS EN-1, Paras 3.2.6 – 3.2.8). Finally, in terms of any change in impacts of the Proposed Development due to any delay, 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.
Q1.0.7	The Applicant	Battery Storage At ISH1 and in the subsequent written submission, the battery storage was described as associated development, and how it met the tests set out in the guidance for such development. 1.Please provide the details of the capacity of the battery storage.	(1) Currently, the West BESS is sized at 500MW/2000MWh, and East at 370MW/1480MWh. These are both 4-hour systems. This has been developed on the basis of capturing the full capacity produced by the Proposed Development and offsetting to times of need in the grid to minimise curtailment. Capacity has been allowed for degradation across the life of the BESS, to ensure this risk is managed. Alternatively, the Applicant could (at detailed design) reconfigure the BESS for a lower capacity and longer duration, in order to ensure the final detailed design responds to the need and technology at the time. Different configurations would not change the assessments completed for the Proposed Development, and the BESS would always need to comply with the restrictions

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		2. As currently drafted the dDCO does not refer to a particular capacity for battery storage. Would it be appropriate for such a capacity to be included in the description of the Work No.? (The ExA Note this has occurred in other DCOs e.g. Little Crow, and Cleve Hill, although there are other examples where this would not appear to be the case) 3. In the event that it is not considered appropriate to reference the capacity of the battery storage, please clarify what ensures it would be proportionate to the NSIP, and not an aim in itself or a means of generating income to cross subsidise the cost of the principal development?	included in the DCO regardless of its configuration in terms of capacity and duration. (2) As the ExA notes, there are limited examples of where a capacity limit has been placed on BESS. It is noted that a minimum capacity is included in the Cleve Hill DCO, however, that reflects that the BESS was at that time a type of infrastructure requiring consent under the Planning Act 2008 as a nationally significant infrastructure project, so the drafting is to confirm that the BESS met the thresholds in place at the time. The Little Crow capacity limit is not a reliable precedent in this context, as it is not clear from the Secretary of State's decision letter why that figure was chosen and imposed. The majority of made solar DCOs to date, that consent BESS as associated development, have not imposed a capacity limit. The Applicant's position is that the BESS and its impacts are appropriately controlled by the measures proposed to be secured in the draft DCO, principally the Works Plans [APP-014], Outline Design Principles [REP1-021] and Height Parameter Plan [APP-016] (which together control location, separation distances and the size of the BESS) and the outline Battery Safety Management Plan [REP1-059]. The Applicant therefore does not consider that is it appropriate or necessary to impose an upper limit on the capacity of the BESS. A capacity limit would not constrain environmental impacts of the BESS, and is not necessary (or effective) to ensure the BESS is associated development (addressed further below in part (3)), and would only serve to constrain the extent to which the BESS could support and help maximise the benefit to be generated by the solar PV (i.e. the NSIP). (3) The Applicant has referenced in response to part (2) of the question, the controls over the BESS. Those controls include restrictions as to where the BESS can be located and how large it can be. As a result, the BESS size is limited to up to 112,000m2 on the West Side, and 85,000m2 on the East side [APP/5.9.1]. The maximum area shown on the Works Plans for Work No. 1 (solar PV) is approximately 308 hectares, whilst the area shown for Works No. 2 (BESS)

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			is 40 hectares; so on a rough calculation, the area available for BESS is around 13% of the area available for solar PV. This demonstrates ensures that the BESS is proportionate to the solar PV in scale. That breakdown, demonstrating the proportionately small area of the Order limits that is taken up by BESS, also demonstrates its subordinate role and proportionate nature in supporting the solar PV (a significantly greater area of land, proportionately) to make its operation as efficient as possible, helping to maximise the benefits from the Proposed Development. This point goes to the design of the Proposed Development, and integral to that is that it is a solar PV generating station, which is supported by BESS, with the primary role of the BESS being to support the efficient generation of the solar. That is implicit in the design of the scheme itself; the BESS is very clearly not an aim in itself in that context. The secondary role of the BESS is in providing ancillary and balancing services to the national grid, which are necessary to deal with and mitigate the impacts of increasing amounts of renewable energy on the grid, including from the Proposed Development. In this way, the BESS further supports and is subordinate to the solar PV NSIP. The role and importance of BESS in supporting renewables and its ability to be associated development is established in the energy NPSs. Paragraph 2.10.16 of NPS EN-3 relates to the consideration of associated development specifically in relation to solar development. This specifically identifies energy storage as an example of the kind of associated infrastructure that may be treated as associated development as part of a solar farm. Paragraphs 3.3.4 to 3.3.7 of NPS EN-1 recognise and support the role that storage has in sitting alongside and being ancillary to the primary generating station to provide increased flexibility and improved efficiencies to supply electricity to the grid when demand is higher. Finally, in terms of the cross-subsidy point, the wording of the guidance is important, as it states: "*Development should not be treated as associated*

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			development if it is only necessary as a source of additional revenue for the applicant, in order to cross-subsidise the cost of the principal development. This does not mean that the applicant cannot cross-subsidise, but if part of a proposal is only necessary as a means of cross-subsidising the principal development then that part should not be treated as associated development". The Applicant has outlined above the purpose of the BESS, being to support the impact of the solar PV generating station, and it is clear from that role and the benefits that come from it, that the BESS is not "only necessary as a means of cross-subsiding the principal development". There is useful commentary covering these points from the ExA in its recommendation report on the Gate Burton Energy Park solar DCO, at paragraphs 1.3.12 and 1.3.15 to 1.3.17 confirming that BESS was associated development: "*1.3.12 …evidently necessary associated development…The inclusion of these associated development was not questioned by the Interested Parties (IPs) and I am satisfied that they reasonably fall within the core principles established in the Guidance…* *1.3.15. From the information before me I am satisfied that the colocation of a BESS with a solar generating station is a reasonable and appropriate function. As noted at paragraph 2.10.10 of the 2024 National Policy Statement EN-3 in respect of the British Energy Security Strategy "It sets out that the Government is supportive of solar that is co-located with other functions (for example agriculture, onshore wind generation, or storage) to maximise the efficiency of land use." And at 2.10.16 where it is stated "Associated infrastructure may also be proposed and may be treated, on a case by case basis, as associated development, such as energy storage…*" *1.3.16. Whilst the Applicant notes that the overall capacity of the generating station and the BESS are not proposed to be capped in terms of electrical output the ODPs place a physical envelope within which the development must be*

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			contained. The BESS in terms of its physical size and footprint, its location within the extent of the Solar and Energy Storage Park and its nature is consistent with and proportionate to the scale of the generating station. The BESS is directly related to the proposed generating station to store and export electricity generated by the generating station and would thereby support the operation of the principal development. It is not an aim in itself in that it would not be sited and developed at this location were it not for its association with the generating station. *1.3.17. As to whether the BESS would generate additional revenue for the Applicant, there is no detailed financial break down before me, but it is not unreasonable to conclude that providing grid balancing services and accepting the importation and exportation of electricity from the BESS would have a commercial benefit. However, the Guidance advises that development should not be treated as associated development if it is only necessary as a source of additional revenue. Moreover, it goes on to advise t this does not mean that the applicant cannot cross subsidise. Given that there is a reasonable and legitimate benefit associated with the provision of storage, co-location is supported by government, and it is not the case that the BESS is only being proposed as a source of additional revenue I am satisfied that the BESS is appropriately included as associated development." Moreover, it goes on to advise that this does not mean that the applicant cannot cross subsidise. Given that there is a reasonable and legitimate benefit associated with the provision of storage, co-location is supported by government, and it is not the case that t* *e BESS is only being proposed as a source of additional revenue I am satisfied that the BESS is appropriately included as associated development." h* *The Secretary of State, in reaching his decision on the Gate Burton Energy Park agreed with the ExA stating at paragraph 4.2 that: "…BESS constitutes associated development, noting that it will enable grid balancing and is ancillary to energy generation; as storage directly linked to the operational generation and efficiency, the BESS will help deliver a secure and reliable energy supply."*

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			The Applicant's position is that the same findings from the Gate Burton Energy Park decision with respect to BESS can be made in relation to the Proposed Development, for the reasons set out above.
Q1.0.8	The Applicant	**Application Form** Is the address listed correct, there appears there may be a typographical error in the 'City or Town' box. If so please correct.	The Applicant will provide an updated Application Form with the typographical error fixed in the 'City or Town' box at Deadline 2.
Q1.0.9	The Applicant	**Dates of Photographs** According to the Viewpoint Photographs included as Volume 3 Figures 11.1-11.14 Part 1-19 the photographs were taken on 6, 7 March 2024, 18 March 2024, 12 September 2024. Yet paragraph 11.3.12 of ES Chapter 11 does not include all of these dates. Please clarify the position.	The Applicant has provided an updated LVIA Chapter 11 at Deadline 2 with the missing dates of field work for March 2024 at paragraph 11.3.12. The date of 12 September 2024 is already noted at paragraph 11.3.12.
Q1.0.10	The Applicant	**Locations of Photographs** In ES Vol 3 Figures 11.1-11.14 – Part 16 The Viewpoint locations appear to be slightly different locations from the versions provided elsewhere, please explain the discrepancy.	The ES Vol 3 Figures relating to Chapter 11 were resubmitted by the Applicant in response to the Rule 17 letter to provide further clarity in the file name on what was included within each document – see [AS-019 to AS-043]. The Applicant confirms that the viewpoint locations shown on the thumbnails for each photomontage [AS-037 – AS-043] are correct and consistent with the representative viewpoint location plan [AS-029] and the baseline photography [AS-031 – AS-036]. The thumbnails for each photomontage do however show a superseded version of the Order Limits which has been updated at Deadline 2.

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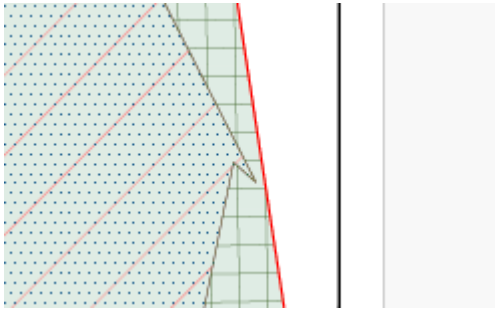
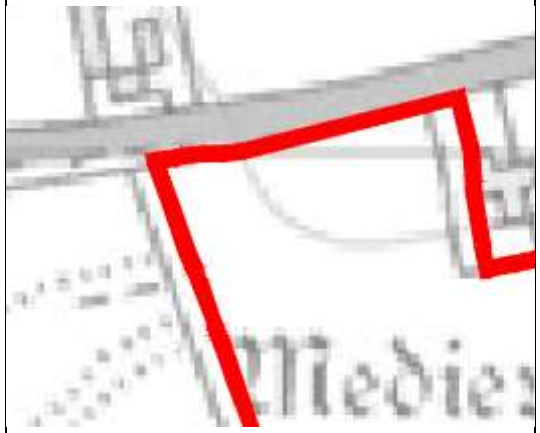
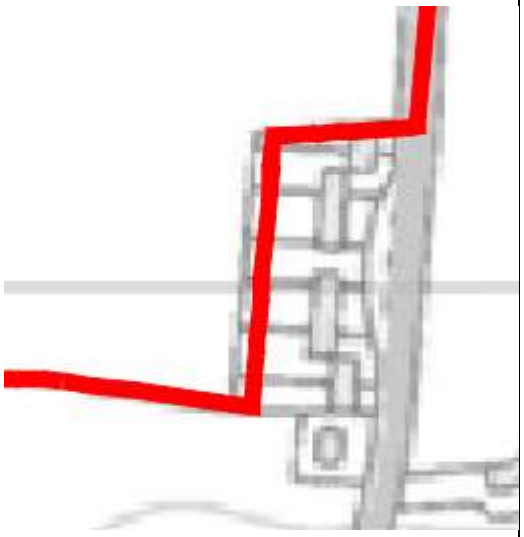
Q1.0.11	The Applicant	**Residential Receptors** Table 11.10 on page 70 of ES Chapter 11 identifies a series of residential receptors, (Figure 13.2 identifies residential receptors R1-R10, for the Air Quality Chapter) please advise where a similar plan can be found identifying these receptors in respect of the landscape chapter? The ExA note there is additional detail provided in the D1 response with a series of sheets described as 'Residential assessment and design response'. We have not located a table or plan which identifies the residential receptors. If there is not one, please provide one, or advise us where it can be found. In the absence of a plan clearly identifying individual residential receptors, please set out how you have undertaken an individual assessment for each residential property in either landscape, amenity or health terms.	As explained during Issue Specific Hearing 1 and summarised in the Written Summary of Applicant's Oral Submissions at the ISH1 [REP1-077], there is no plan that identifies residential receptors as the LVIA [REP1-025] assesses the impacts on residential receptors in particular views, which are shown on Figure 11.10 [AS-029]. This approach is in accordance with GLVIA3 paragraph 6.31. Figure 11.10 [AS-029] should be read in combination with Table 11.9 of Chapter 11 [AS-017] which acknowledges the different types of residential receptors, and the viewpoints identified to represent their particular views. The Applicant 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]. Section 1.3 of Appendix F explains how residential properties have been assessed.
Q1.0.12	The Applicant	**Works Plans** Within the Landscape Chapter of the ES several references are made to distances of separation or offset being secured in the works plans, for example: Paragraph 11.5.15 - 15m to Work No.1	The minimum offsets between sensitive receptors and Work Areas, as shown on the Works Plans, will be secured by the Outline Design Parameters [REP1-021]. The Outline Design Parameters define the spatial extent of development and ensure that the separation distance referred to in ES Chapter 11 are adhered to. The points from which each offset is measured is listed by item below:

ExA Q Ref	Respondent	Question Summary	Applicant Response
		Paragraph 11.6.16 – 30m around bridleways It is not clearly apparent how these offsets are secured, please explain how this is achieved by reference to the Works Plan? Where would an offset be measured from? Please specify how the measurement is to be taken for each item where an offset is to be secured e.g. hedgerow, woodland, waterbody, watercourse, PROW, residential property etc. Would it not be clearer to have a plan specifically referencing the separation distances to each of the bridleways, residential receptors, PROW etc or a Requirement to the effect of a defined minimum and how it is to be measured? In considering your response the ExA note that within the DAD there are a series of images refencing the final masterplan where offsets are set out, the ExA wonder if this could provide a useful starting point to show the whole if incorporated as a single document to be certified?	• Hedgerow – measured from the centreline, as defined by the topographic survey commissioned by the Applicant. • Woodland – measured from the edge of canopy, as defined by the topographic survey commissioned by the Applicant. • Waterbody and watercourse – measured from the water's edge, as defined by the topographic survey commissioned by the Applicant. • PROW – measured from the centreline, as defined by the Definitive Rights of Way Map as provided by Lincolnshire County Council and Nottinghamshire County Council. • Residential properties – measured from the primary habitable buildings, as defined by the topographic survey commissioned by the Applicant. While the Applicant acknowledges the ExA's suggestion of producing a dedicated plan showing all offset distances, it is considered that such a plan may compromise legibility due to the density and variability of receptors across the Order Limits. Instead, the Applicant proposes that the scaled Works Plans, in conjunction with Outline Design Parameters, provide a more flexible and transparent means of assessing separation distances. This approach allows any interested party to understand the tailored approach to offsets across different receptor types and locations.
Q1.0.13	The Applicant	**Works Plan**	The Applicant notes the error and has provided an updated Works Plans at Deadline 2 with corrected boundary on Sheet 1 [APP-014].

ExA Q Ref	Respondent	Question Summary	Applicant Response
		 Sheet 1 appears to have an error as indicated in the snip – please clarify or correct as necessary	
Q1.0.14	The Applicant	**Plans** The Location Plan and the Land and Works Plans do not appear to have the same boundaries. For example, at Roberts Close the location plan appears to include parts of the gardens to these properties, in addition the boundary around Whimpton Moor Medieval village does not appear to correspond, nor does the boundary to the residential property to the east of this.	The Applicant confirms that the same spatial data was used to draw the boundaries on the Location Plan [APP-012], Land Plan [REP1-004] and Works Plan [APP-014]. The issue identified by the ExA appears to be as a result of the use of different OS background mapping on the Location Plan [APP-012]. The Applicant has submitted an updated Location Plan at Deadline 2.

ExA Q Ref	Respondent	Question Summary	Applicant Response
		 	

ExA Q Ref	Respondent	Question Summary	Applicant Response
		It is important that these documents align, please prepare a location plan, that aligns with the land plans and works plans.	
Q1.0.15	The Applicant	Mitigation 1. Is there a flow chart showing the interrelationship between the dDCO, the Requirements and the various outline mitigation plans? If not can one be provided 2. Within a number of documents (DAD,) etc. measurements are identified to be limited by way of 'above ground level' (for Power Conversion Stations 6m) how is this to be verified? 3. Is the topographical survey within the FRA (Appendix A1) the basis of what should be relied upon as showing the detailed baseline which should then be included in the Certified documents and specifically referenced as such?	1. A flow chart is provided at Appendix A to this document. This shows how the provisions of the draft DCO are proposed to control the impacts of the Proposed Development, should consent be granted. The flow chart is focused primarily on the requirements in Schedule 2, however, on the left hand side it also highlights key provisions (beyond Schedule 2) that secure control documents (such as the Works Plans) or require approval of details / additional oversight (e.g. protective provisions). The left hand section also identifies how the outcomes of the Environmental Statement are secured throughout the draft DCO. Throughout the flow chart, certified documents are shown in green, to illustrate the relationship between the dDCO provisions and the certified documents. In the case of the requirements, the flow chart identifies what details or documents require approval, and use a ">" to indicate where that is linked to a certified document. The requirement have also been divided into the different stages of the development to indicate the requirements that control detailed design, construction, operation and decommissioning (noting that there is some overlap as some requirements cover more than one stage). There is a small stand alone table in the right bottom part of the flow chart, which shows the sub-plans that are secured under the primary plans (which are themselves secured by requirements). Regardling point 2, publically available topography for the Proposed Development already exists, and further surveys have been completed as part of the Applicants assessments which these can be measured againt. These can be found in

ExA Q Ref	Respondent	Question Summary	Applicant Response
			Appendix A1 of ES Volume 3, Appendix 7.2: Flood Risk Assessment and Outline Drainage Strategy [AS-051]. In relation to point 3, the Applicant will submit detailed design for approval pursuant to Requirement 5 and this will show conformity with the heights in the Outline Design Parameters and Height Parameter Plan, including cross-sections which will show ground level and the heights of the infrastructure for approval. The relevant planning authority has the ability to request further information from the Applicant pursuant to the procedure under Schedule 15 of the draft DCO should it require further detail on the ground level, heights of infrastructure and how the design parameters are complied with. The Applicant is not aware of examples in made Orders where above ground level has needed to be a certified document, and the term is often used both in Orders and other legislation without further definition.
Q1.0.16	The Applicant Nottinghamshire and Lincolnshire CCs (3)	**Mitigation** 1. The outline Operational Environmental Management Plan (oOEMP) Revision 2 (submitted at D1) indicates at paragraph 2.6.2 that "In the event of large-scale replacements of components being required, it is anticipated that the procedure will be done gradually over a period of time to minimise the number of HGVs movements to the site." How is this to be managed? 2. The TA appears to indicate that during operation traffic movements would be limited to up to 10 LGVs and 12 HGVs, in the event that panels will need replacing	1. Traffic movements will be controlled through the final Operational Environmental Management Plan, secured via 14 of the DCO. The OEMP will include a maximum number of daily vehicle movements. Gradual replacements of components will be undertaken to ensure HGV movements remain within assessed limits The approved OEMP would be approved by the planning and highway authorities, prior to implementation. 2. Operational traffic numbers would be controlled via the approved OEMP (secured via Requirement 14of the DCO). Economic considerations will also naturally limit replacement frequency to avoid loss of generation potential. With approximately 800 panels per shipping container, replacements can be delivered efficiently within the 12 HGV/day limit. A staff travel plan will also manage workforce movements, supporting up to 50 staff per day.

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		during the operational period, what mechanism is in place to ensure transport matters are controlled to within the numbers this suggests? 3. Can the Councils confirm whether the management of operational traffic as currently proposed is consider suitable?	In addition, the Applicant's response to Q3.0.2 sets out the mechanisms in place to control the activities during operation, which are also applicable to traffic.
Q1.0.17	The Applicant	**Other Consents** In light of the RR from the Health and Safety Executive (HSE) please advise whether any Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended are proposed to be stored or used on the site. If there are any of these substances, what quantities would there be, and does this exceed the threshold set out in The Planning (Hazardous Substances) Regulations 2015 as amended such that consent would be required?	The Applicant is not aware of any need for a Hazardous Substance Consent for the Development, based on substances expected to be on site. If this changes, the application process will be undertaken accordingly.
Q1.0.18	The Applicant	**HSE** Has a risk assessment been carried out as per the advice in Advice Note 11 "working with public bodies in the infrastructure planning process" Annex G on the Planning Inspectorate's website: Nationally Significant Infrastructure	The Applicant understands the HSE require consideration of a risk assessment. However, this is only "If the Proposed Development will be in scope of the COMAH Regulations". The Applicant does not consider this site to fall under the COMAH regulations.

ExA Q Ref	Respondent	Question Summary	Applicant Response
		Projects -The Health and Safety Executive - GOV.UK? Please advise where this can be found if it has been submitted, alternatively set out your response to the HSE RR when this might be undertaken and submitted to the Examination.	
Q1.0.20	The Applicant	**Community Fund** Reference to this fund is made in the ES Chapter on Human Health (paragraphs, 16.5.11, 16.6.17, 16.6.55), and it was referenced during the hearings of the week of 7 July 2025 please explain further what this fund is, if it is secured by way of the DCO how this is secured, and what mitigation it offers. If it does not offer mitigation what is its purpose?	ES Volume 2, Chapter 16: Human Health [APP-045] refers to two different community benefit funds, a small one which is already operational and is currently supporting local projects, and the other which is a larger fund that would be created if the project is consented. These funds are not secured in the DCO and are provided outside of the planning process as a voluntary commitment by the Applicant. The purpose is to ensure that there are local benefits from the Proposed Development, in addition to the benefits provided to meet national energy targets. The purpose is not to offer mitigation due to no significant effects being identified that this fund would mitigate, but to serve as an act of goodwill to the local community. At this time, community benefit funds are not mandatory and not part of the DCO process, though the Applicant notes that a government consultation has just finished which would make community benefit a requirement for large scale renewable energy projects like the Proposed Development. Should that policy be enacted, the Applicant would meet those requirements.
Q1.0.21	The Applicant and all parties	**Consultation on National Policy Statements** The Government published on 24 April further consultation on each of the National Policy Statements, NPS – EN1,	The proposed April 2025 revisions to the NPSs are intended to ensure that the NPSs reflect current energy policy, such that the investment required to achieve 'Clean Power by 2030' and Net Zero by 2050 can be delivered. Draft NPS EN-1 explains that "*… For any application accepted for examination before the final publication of the approved 2025 amendments, the 2024 suite of NPSs should have effect in accordance with the terms of those NPSs … Any*

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		EN-3 and EN-5. The consultation period closed on 29 May 2025. Please advise if there are any areas of these documents that you consider the ExA should regard as important or relevant to the consideration of the Proposed Development.	*emerging draft NPSs (or those designated but not yet having effect) are potentially capable of being important and relevant considerations in the decision-making process."* (Paras 1.6.2 & 1.6.3). Section 3.6 of the Statement of Need [APP-173] explains that the government's support for renewable generation going forwards is no lower than the support set out in existing publications and strategies and in the current NPSs, and if anything is emerging to be more supportive because of the unprecedented and urgent need. Draft NPS EN-1 confirms that government's *"objectives for meeting the Clean Power 2030 Mission are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050 … Meeting these objectives necessitates a significant amount of new energy infrastructure, both large nationally significant developments and small-scale developments determined at a local level"* (Para 2.3.2). Para 3.3.19 of draft NPS EN-1 incorporates the government's aim to deliver its Clean Power target by 2030 in place of previous policy and strategy aims. Draft NPS EN-1 explains that renewable technologies will form the foundation of the UK's clean power system and that a rapid increase in low carbon generation, flexibility infrastructure and electricity transmission infrastructure must be delivered through the 2020s and 2030s to achieve and maintain the Clean Power target (Para 2.3.6), especially as demand for electricity *"could more than double by 2050"* to reach Net Zero (Para 3.3.3). This provides further support for the continued development of schemes with connection dates both before and after 2030. The November 2023 NPSs establish the policy position that there is a critical national priority for infrastructure which delivers decarbonisation and energy security benefits. This policy applies to solar and other low carbon technologies of nationally significant scale. Designation of the draft NPSs as written would increase the threshold for nationally significant solar projects from 50MW to 100MW.

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			Otherwise, critical national priority policy as included in the April 2025 NPSs is unchanged from the November 2023 (designated) NPSs (see Paras 4.2.18 – 4.2.20 of the Statement of Need [APP-173], which confirm that there is a critical national priority for large-scale solar projects. Para 3.3.22 of draft NPS EN-1 explains government's view that *"there is no singular path to achieving clean power, but instead, that there are a range of scenarios that could get us there."* Some technologies may be more successful than others in delivering sufficient low carbon generation infrastructure to meet carbon reduction requirements. Progress (or otherwise) in delivering projects across all technologies will help to refine future capacity needs. Therefore, in all cases, a robust pipeline of development projects across many technologies is needed to provide options for the efficient and timely delivery of the unprecedented capacity of low carbon generation needed to achieve, and keep achieving, Government's Clean Power target. Para 3.3.23 of draft NPS EN-1 reconfirms government's view that *"a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar"* and to be supported by energy storage, which will reduce the costs of the electricity system, increase its reliability and provide services to the electricity system on a local and national basis (Para 3.3.27 & 3.3.28). Draft NPS EN-1 also clarifies that the government *"does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government's ambitions in energy policy and other policy areas"* (Para 3.2.4). Para 3.2.6 clarifies that the Clean Power Capacity Ranges are not intended to propose limits on any new infrastructure that can be consented because of the affordability benefits arising from competition within and between clean power technologies.

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			Paras 3.2.9 and 3.2.10 of draft NPS EN-1 confirm that the Secretary of State has determined that substantial weight should be given to the need for projects to come forwards for development consent under the Planning Act 2008, and that the Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in the NPS. Draft EN-3 mirrors the update of policy aims included in draft NPS EN-1 and applies to solar generation above the nationally significant threshold. Notably, government states that the UK has huge potential for solar power and that solar energy is at the heart of the Clean Power 2030 Mission (Paras 2.10.1 & 2.10.2). Other aspects are consistent between the November 2023 (designated) NPS EN-3 and the April 2025 draft NPS EN-3. Government's Centralised Strategic Network Plan (CSNP) will enable the delivery of a long term, holistically designed network plan and will be subject to a Strategic Environmental Assessment. The CSNP would establish the need case and technological solution for projects which adhere to the recommendations of the CSNP. Endorsement of the CSNP through the NPS, as is proposed in draft NPS EN-1, would mean that the need case and technology type for projects that adhere to the recommendations of the CSNP would be established and not questioned during the consenting process (Paras 3.3.78 & 3.3.79). Draft NPS EN-5 includes updates to maintain its consistency with draft NPS EN-1 on relevant points and together these draft revisions would, if adopted, add support to any case for consent made for network infrastructure including the upgrading of existing substations, such as at High Marnham, to support government's energy policy aims.
Q1.0.22	The Applicant	**Recent Legal Cases** Could the Applicant provide comment in light of the recent cases of R (on the application of Finch on behalf of the	The Applicant has been cognisant of recent case law in undertaking its assessments. Neither of these cases have any implications for the assessment of greenhouse gas (GHG) emissions submitted in support of the Proposed Development.

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		Weald Action Group) v Surrey County Council [2024] UKSC 20 and Friends of the Earth Ltd and South Lakeland Action on Climate Change v SSLUHC [2024] EWHC 2349 (Admin), and whether these cases have any implications for the assessments of greenhouse gas emissions?"	The Finch case was centred on a challenge to the scope of the GHG assessment within the ES for a oil extraction development. The GHG assessment excluded (as agreed in Scoping Opinion from Surrey County Council) an assessment of effects from GHG emissions resulting from the combustion of fuels refined from the oil extracted from the development. The judgement found this (the act of scoping these emissions out) to be unlawful in relation to the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, which requires EIA to consider all likely effects (both direct and indirect). The combustion of fuels refined from the extracted oil was judged to be a clear indirect effect of the development. The Cumbria coal mine case related to exactly the same technical issue of scoping out emissions from combustion of fuels extracted from the development, but related to extraction and use of coking coal rather than oil. In relation to GHG assessments as a whole, the implications of both of these cases is clear that all direct and indirect GHG emissions associated with proposed developments must be included in a GHG assessment where they have potential for significant effects. In the Finch and Cumbria coal mine cases, the emissions from combustion of extracted fuels would likely have contributed well over 95% of each development's total GHG emissions and as such there was little debate over their potential significance. For obvious reasons, the One Earth Solar Farm does not result in extraction and use of fossil fuels and has very limited direct emissions during construction, operation and decommissioning. The Proposed Development will, however, indirectly result in GHG emissions, mainly through the supply chain for solar panels and other components. These indirect GHG emissions occur in the mining and processing of metals and minerals, energy used in the manufacture of components, and fuel and energy used to transport materials and components to the Site.

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			All of these indirect emissions are robustly accounted for in the GHG assessment submitted in support of the Proposed Development and as such, the assessment provided complies with the principles defined in the Finch and Cumbria coal mine cases. The Applicant has also provided Appendix 18.4: High Marnham Substation Cumulative Carbon Emissions [APP-148] with its application. As explained in paragraph A.18.1.2 of that document, and reflecting the case law referenced in the question, the reasoning for providing Appendix 18.4 is as follows: *"Although GHG emissions associated with the proposed National Grid High Marnham Substation are outside the scope of the GHG assessment for the Proposed Development, it is considered that it may be helpful to provide further information on potential emissions associated with the proposed National Grid High Marnham Substation into which the Proposed Development is likely to connect. Therefore, for contextual purposes, this section provides an outline of the GHG emissions associated with the proposed National Grid High Marnham Substation and an evaluation of the associated likely cumulative GHG effects*."
Q1.0.23	The Applicant	**Outline Site Waste Management Plan (oSWMP)** Please clarify why the oSWMP is not included within the dDCO in a similar way to the other mitigation plans? The outline Operational Environmental Management Plan refers to the Site Waste Management Plan at paragraph 2.9.1 should this be the oSWMP?	Reference to the Outline Site Waste Management Plan is made in the Outline Construction Environmental Management Plan in section 1.2 Complementary Plans and Procedures [REP1-047] which states that these plans will be developed alongside the Construction Environmental Management Plan. The Applicant considers the oSWMP can be adequately secured as a sub-plan to the oCEMP, as the CEMP to be submitted for approval needs to be substantially in accordance with the oCEMP, which includes the provision for a SWMP, and the provisions of the approved CEMP (including sub-plans approved as part of it) must be complied with under the requirement, meaning the sub-plans must equally be complied with. The approach to securing sub-plans as part of the construction, operational and decommissioning plans is a well established approach.

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			The Applicant will adjust the Outline Operational Environmental Management Plan to refer to the Outline Site Waste Management Plan, as has been produced.
Q1.0.24	The Applicant, Environment Agency, Councils	**Waste** Can each party provide commentary on their views in respect to compliance with the Regulations: Waste Electrical and Electronic Equipment (WEEE) 2013	The Applicant will comply with The Waste Electrical and Electronic Equipment Regulations 2013 by using the Product Compliance Scheme selected by the manufacturer/importer/distributor of the solar panels used in the Proposed Development.
Q1.0.25	LCC and NCC (1) The Applicant (2) and (3)	**Waste Planning** 1.In light of the number of solar schemes already approved, and the number in the pipeline, what plans are being prepared as waste authorities to manage this over the coming years? 2. What proposals are you committing to ensure that the panels can be recycled, as you indicate a commitment to a 100% recycling rate? 3. Please provide further detail on how components from the BESS have been planned to be recycled?	2. As set out in the Outline Decommissioning Environmental Management Plan [REP1-051] and Outline Operational Environmental Management Plan [REP1-049] paragraph 2.93 and 2.9.4: *"The Contactor will separate the main waste streams on-site, prior to transport to an approved, licensed third party waste facility for recovery, recycling or disposal.* *Waste Duty of Care will be ensured with respect to all waste generated on Site. All waste to be removed from the Order Limits will be undertaken by fully licensed waste carriers and taken to suitably licensed waste management facilities and managed in line with the requirements of the Waste (England and Wales) Regulations (2011) and the Hazardous Waste (England and Wales) Regulations (2005) (as amended). The Scheme will apply the waste management hierarchy, in priority order: prevention, preparation for reuse, recycle, other recovery and disposal"*. The Applicant will continue to work with the supply chain and the wider solar industry to ensure that 100% recycling of waste panels is achieved. 3. As stated in ES Volume 3, Appendix 2.3: Materials and Waste Impact Assessment [APP-082] *"the handling, recovery, recycling, or disposal of batteries will need to be undertaken in accordance with WEEE Regulations and the Waste Batteries and Accumulators Regulations 2009. This is most likely to be undertaken by the battery manufacturer or supplier."*

ExA Q Ref	Respondent	Question Summary	Applicant Response
Design, parameters and other details of the proposed development			
Q2.0.1	The Applicant	**Design Approach Document (DAD)** Within Figure 12 a diagonal brown line runs across the site, this does not obviously appear in the key. Please explain what this represents, and if necessary, update the key or the Figure.	The Applicant will provide an updated Design Approach Document for Deadline 2 with additional information added to the key to Figure 12.
Q2.0.2	The Applicant	**DAD** Is there a timeline setting out the relationship between the public consultation events referenced on page 37 and the workshops referred to on page 33? If not could this please be provided Page 40 the final sentence appears incomplete –"Table 4 records how the statutory consultation masterplan changed compared to the non-statutory consultation version in" please clarify	A timeline setting out the key milestones in the design process is set out in the Design Approach Document [AS-013] on page 10, and includes the definition of project design principles, as well as the non-statutory consultation. Numerous design workshops were held throughout the pre-application phase including topic specific meetings with environmental specialists to embed mitigation in the design, technical engineering workshops, and meetings to review feedback received through consultation. The workshops listed on page 33 refer specifically to those held to define the project specific design principles, demonstrating that their definition was a collaborative and iterative process prior to the public launch of the project, which occurred in Autumn 2023. The dates of these workshops are provided below: - Workshop 1: identification of environmental constraints and opportunities – 14th July 2023 - Workshop 2: drafting of design principles – 16th June 2023 and 2nd workshop on 26th July 2023 - Workshop 3: refinement adoption of design principles by project board – 9th August 2023. The public consultation activities referenced on page 37 of the Design Approach Document [AS-013] relate to the early engagement and non-statutory consultation details of which are provided within the Consultation Report [APP-151] and summarised below:

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			• 12 Sept 2023- Door knock to 35 near neighbours, emails sent to stakeholders • 13 Sept 2023 – Leaflet posted to the consultation zone, press releases sent to local media • 27 Sept 2023 – Start of consultation, all materials including draft masterplan uploaded to the project website and delivered to community access locations • 5 Oct - 12 Oct 2023 – Public information events (4 in person and one webinar) • 6 Oct – 11 Nov 2023 – Site visits to 14 local properties • 19 Oct, 9 Nov 2023 – Meetings with parish councils In summary, the project's design principles were prepared prior to public launch of the project and the initial public consultation events to help guide and inform design decisions from the earliest opportunity in the design process. The Applicant will provide an updated Design Approach Document for Deadline 2 with corrected text on page 40 to complete the sentence.
Q2.0.3	The Applicant	**Design Parameters** The EM at paragraph 1.6.8 explains that *"Where the Outline Design Parameters [EN010159/APP/5.9] and the Height Parameter Plan [EN010159/APP/2.5] do not include guidance or controls for an aspect of a numbered work, this is justified on the basis of the Environmental Impact Assessment and having regard to the other controls in place via the measures listed above."*	An example of where the Outline Design Parameters or Height Parameter Plan does not include guidance or controls for an aspect of numbered work is the extent of ground disturbance across the Order Limits. ES Chapter 9 on Buried Heritage assumes that the majority of the Order Limits, with the exception of the areas where no works are proposed, would be subject to a degree of below ground disturbance and thereby assesses this as a realistic worst case scenario. However, the approval of an Archaeological Mitigation Strategy is a requirement under the DCO (Requirement 12) and will be used to guide and adapt the mitigation approach according to detailed design and results of the archaeological evaluation carried out to inform the Detail Design and the Archaeological Mitigation Strategy.

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		Please provide an example of such a work and explain how in these circumstances the ES has assessed the worst-case scenario.	
Q2.0.4	The Applicant, (1) The Councils (2)	**Design Principles** To clearly understand the design parameters relied on for the assessment, would it not be beneficial for all parties for these to be set out in a single document to be certified? Do the Councils agree that sufficient information has been provided in respect of design matters to meet the tests set out in NPS EN-1 para 5.10.29 and this is suitably secured to ensure that future consenting would meet landscape, visual and good design objectives?	ES Chapter 5 [APP-034] at Section 5.2 explains how the technical assessments have been based on the Rochdale Envelope approach as described in PINS Advice Note Nine and as is recognised as appropriate for a wide range of NSIPs. In relation to paragraph 5.10.29 of NPS EN-1, which focuses on the detailed design, the Applicant plans to retain flexibility regarding the design detail of certain components of the Proposed Development through the use of the Rochdale Envelope Approach. The extent of flexibility required is described in the Description of the Proposed Development and set out in the Design Approach Document. Good design outcomes will be secured in the detailed design of the Proposed Development, in accordance with the ES assessment, via Control Documents contained within the Draft DCO. Section 5.2 goes on to reference the control documents upon which the maximum and minimum parameters have been defined to allow for an assessment of a reasonable worst-case scenario to be undertaken. These control documents including the Height Parameter Plans within Site Layout Plans [APP-016] which are provided to demonstrate the illustrative layout of the Site, with the exception of the Height Parameter Plans which secure the approved heights across the Order Limits. That there are additional measures noted in the Explanatory Memorandum [REP1-009] that will control the detailed design of the Proposed Development is also not uncommon, particularly for solar NSIPs, and does not detract from the understanding from the design parameters or Environmental Impact Assessment.

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The Environmental Statement (general)			
Q3.0.1	The Applicant	**Environmental Statement** The ES has assessed effects on the basis that the proposed development is temporary, all be it having a 60 year lifespan. Please provide a justification for this approach. If the DCO were to be granted as currently drafted, in legal terms is it correct to say that the DCO is in effect permanent, but it is the requirement to decommission that provides the limitation in time? In these circumstances, what would you regard the planning status of the land to be after the 60 year period?	(1) National Policy Statement EN-3, recognises solar farms as "temporary" forms of development, given their reversibility and time-limited operation. The EIA Regulations (Schedule 4) require assessment of effects by duration and reversibility. As detailed in Chapter 5: Description of the Proposed Development [APP-034], the physical characteristics of the development are described alongside the key activities that will be undertaken during construction, operation and maintenance, and decommissioning. After 60 years the land will be returned to its original state with the decommissioning phase removing of all above ground infrastructure, as well as permissive paths. Trees and hedgerows planted as part of the Proposed Development are assumed to remain in situ as well as any clear span bridges. Whilst 60 years is long-term the time-limited consent is finite, and does not involve irreversible land use, and will be subject to a Decommissioning Management Plan as secured in the DCO. Accordingly, the environmental effects are reversible, and as such the project is assessed as a temporary use. Recent DCOs, such as Cottam, West Burton, Gate Burton and Mallard Pass solar farms, have been consented on the basis of temporary operational lifespans (of 60 years) and with legally binding requirements to remove all infrastructure and restore the land at the end of that period. (2) Yes, that would be a correct statement. (3): The Proposed Development is sought for time-limited period of 60 years, which would be the operational lifetime of the solar farm, after which time it would be decommissioned in accordance with the approved Decommissioning Environmental Management Plan and the land restored back to its previous use, which in this case would be agricultural land. There are controls within the DCO and DEMP which require the decommissioning to be undertaken. As such, the planning status of the land within the Order Limits following the decommissioning of the Proposed Development would be agricultural land.

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Q3.0.2	The Applicant, the Councils, Environment Agency, Natural England	**Environmental Statement** With a 60 year lifespan please explain the frequency with which you would expect to have to replace components, for example BESS, Inverters, Panels. It would appear that there is no specific assessment of replacements as it has been assumed it would be no worse than the initial construction period, is this a correct interpretation? Assuming this is correct, the controls in place during construction to mitigate any consequential effects, would appear to need to be in place during operation, unless there is a control mechanism in place that would prevent a large-scale replacement of components. What would be a reasonable threshold that would ensure adverse environmental effects do not occur?	Table 5.5 of ES Chapter 5: Description of the Proposed Development [APP- 034] outlines the indicative design life of the Proposed Developments components. These figures have informed the environmental assessments, particularly as detailed in Table A14.2.5: Operational Repair, Maintenance and Replacement Assumptions in Appendix 14.2: GHG Footprint Methodology [APP-138] which details the number of replacements expected over the lifetime of the Proposed Development. A phased approach to the replacement of modules has also been included within the Transport and Access Chapter [APP-041] "*During the operational phase, up to 10 LGV trips per day, on average, are predicted to cater for cleaning of modules and general Site maintenance. When longer term maintenance of battery units or modules is required, HGV access will be necessary with up to 12 HGV trips potentially per day*". The Applicant submits that there is a range of controls which operate to restrict the Applicant's ability to 'maintain' the authorised development (this includes its ability to replace components), and that its approach accords with policy, good practice and other recent solar DCOs. Firstly, the definition of 'maintain' in the draft DCO accords with paragraph 5.4.18 of the Nationally Significant Infrastructure Projects – Advice Note Fifteen: drafting Development Consent Orders where the definition as drafted does not authorise development which may result in significant environmental effects not already assessed in the ES. The definition has been drafted to directly reflect the nature and context of the Proposed Development, which will need to be properly maintained, managed and protected throughout its operational lifetime. The drafting, therefore, reflects this operational period and likely framework of maintenance that will be required while enabling technological and practice advancement and improvements within identified environmental performance standards. The definition of "maintain" already contains limits, and this approach is consistent with the structure of the maintenance power in all recent NSIP DCOs. The approach is also aligned with the Advice Note as the control on "maintain" is by reference to its environmental impacts, rather than an arbitrary restriction on a specific activity.

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			Secondly, Article 5 (power to maintain the authorised development) at sub-paragraph (3) of the Draft DCO only authorises maintenance to be carried out where there are no materially new or materially different environmental effects that have not been assessed in the environmental statement, therefore limiting the actions the Applicant can undertake, by reference to the impacts that maintenance activities would have. Thirdly, the outline Operational Management Plan [REP1-049] has been updated to incorporate a Replacement Schedule, which serves as a control mechanism to avoid replacement of components to such an extent that it would result in materially new or different likely sig effects to those assessed in the ES (and for which the controls included in the oOEMP have been designed).. As components near the end of their indicative design life, they will be assessed to determine whether maintenance and/or replacement is necessary. Any required works will be programmed in stages, rather than undertaken wholesale, thereby ensuring continuity of electrical export to the National Grid and avoiding introducing any new or materially different likely significant effects to those assessed in the ES.. This section sets out how the Applicant is committing to an annual report provided to the relevant planning authority on activities in the upcoming twelve months, which must include (at a minimum) details which confirm that "the environmental effects that are likely to arise as a result of such maintenance and the environmental controls to be implemented are not materially worse than those reported in the ES". This mechanism supports the local authorities in ensuring compliance with Article 5(3) of the DCO. Finally, Schedule 15 of the Draft DCO provides an ultimate control through the procedure for discharge of requirements. Paragraph 3 of Schedule 15 requires that any application seeking to discharge a requirement made by the undertaker to the relevant planning authority 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 environmental statement and if it will then it must be accompanied by

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			information setting out what those effects are". The undertaker must also confirm that the relevant consultees have been provided with the relevant information forming part of the discharge application, where mandated by the requirement. It is then at the discretion of the relevant planning authority to determine whether the requirement has been successfully discharged. With these controls in place, there is no need for further restrictions; the Applicant has proposed appropriate checks and balances to ensure that the environmental impacts of the Proposed Development – including maintaining it during the operational phase (including replacement) - have been assessed and secured appropriately.
Need			
Q4.0.1	The Applicant	**Generating Capacity** Within the Explanatory Memorandum and other documents reference is made to (paragraph 1.4.3) the description of Work No.1, but does not refer to an upper limit on the capacity of the generating station. The ExA understand this aligns with SoS decisions on other Solar DCOs, however is it not still necessary to understand the likely generating capacity to be able to understand the benefit of the likely energy generation? Please explain the mechanisms within the Order that constrain the parameters of the development to those within the ES and the 'consent envelope'.	The Applicant maintains the position that it is neither appropriate nor desirable to impose an upper limit on the capacity of the solar PV generating station. That position is consistent with paragraph 2.10.56 of EN-3 (which states that installed export capacity should not be seen as an appropriate tool to constrain the impacts of a solar farm, and that applicants should use other measures such as panel size, total area to set the maximum extent of development when determining the planning impacts) and reflects that the environmental impacts of the Proposed Development are not directly related to its capacity. In terms of the benefit of the likely energy generation, the benefit is the contribution of the Proposed Development to the established urgent need for the types of infrastructure covered by NPS EN-1. Paragraph 3.2.7 of EN-1 confirms that substantial weight should be given to the urgent need for this type of infrastructure when considering application for development consent. Paragraph 3.2.8 continues that the Secretary of State is not required to consider separately the specific contribution to any individual project to satisfying the need established in EN-1. The mechanisms within the Order that constrain the parameters of the development to those within the ES and the "consent envelope" are illustrated in the flow chart prepared in response to Q1.0.15 – this shows (1) how the

ExA Q Ref	Respondent	Question Summary	Applicant Response
			requirements place controls over the detailed design of the Proposed Development, its construction, operation / maintenance and decommissioning, as well as (2) other controls or oversight over aspects of the Proposed Development via other articles or documents (for example, the restriction on the location of components achieved in part via the works plans). The flow chart also identifies the mechanisms by which the Applicant is tied to or accountable in relation to the effects identified in the ES (in particular the ability to construct the authorised development in Art 3(3), the power to "maintain" the development pursuant to Art 5(3), and the "lock" in Schedule 15, paragraph 2(3)(a) for every application to discharge a requirement to confirm the application is not likely to give rise to materially new or materially differently effects to those in the ES). Together these controls provide the "consent envelope", as envisaged by EN-3.
Q4.0.2	The Applicant	**Generating Capacity** What ensures that the 740 megawatts capacity will be installed? Should there be a requirement that ensures this is delivered?	There is a natural, commercial incentive on the Applicant to ensure it maximises the available grid connection under its grid connection agreement and makes the most efficient use of the land available to it. The Secretary of State's decision letter making The Little Crow Solar Park Order 2022 is instructive on this point, at paragraph 4.35 (when considering whether to set a minimum power rating for the installed solar panels to ensure a more efficient use of land): *"The Secretary of State has no information in front of him to conclude otherwise than that the Applicant would make best efforts to make the proposed Development as efficient as possible in terms of land use. Indeed the Applicant's request that the Secretary of State should not set a maximum generating capacity is indicative of its desire to ensure the most efficient use of land that it can in terms of the production of electricity. The Secretary of State anticipates it would in most cases be in an operator's commercial interest to do so."*
Q4.0.3	The Applicant	**Statement of Need**	The Statement of Need has been re-submitted at Deadline 2, removing the duplicated 'Figure 7-3' image from both within paragraphs 7.4.24/25 and before paragraph 8.5.7.

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		Paragraph 7.4.24 would appear to be incomplete, please correct or clarify if this is a typographical error. At paragraph 8.5.7 an image appears which appears to be a repeat of Figure 7-3 from page 121 please correct or clarify.	No text changes were required to the document, and for the ExA's ease, paragraph 7.4.24 now reads: "It is important to recognise therefore, and as evidenced by the data shown in Figure 7-3, that connection to the electricity network, which is an essential element of project development, is currently a constraint to many schemes which are coming forwards"
Site selection and alternatives			
Q5.0.1	The Applicant	**Site selection** We note additional information is due to be provided at Deadline 2, please ensure it includes answers to the following questions What proportion of the site in percentage and area terms is within Flood Zone 3? What proportion of the solar panels in approximate number and percentage are within Flood Zone 3? What is the estimate of the power generation from those panels?	1) 622 ha of the Site lies within Flood Zone 3 which represents 44.1% of the total site area (taken to be 1,409 ha). 2) 445.4 ha of the panels are within Flood Zone 3 which represents 49% of the total panel area. 3) 49% of the total panel area is within Flood Zone 3, which amounts to approximately 362.6MW of generation capacity
Q5.0.2	The Applicant	**Search Area** **It is understood this will be responded to at D2** At ISH1 it was indicated that there is no set distance that is prescribed in identifying a search area, and reference was given to other DCO solar schemes where the area of search was both	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

ExA Q Ref	Respondent	Question Summary	Applicant Response
		greater than and less than the 10km chosen here. Can the Applicant explain what limits the distance from the proposed connection point at High Marnham in technical terms and therefore what distance from High Marnham a solar scheme of this scale could be located? Assuming that a greater distance than 10km is possible, what justification is there for the limitation of a 10km search area?	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.
Air quality and emissions			
Q6.0.1	The Applicant	**Air Quality – Planning Guidance** In undertaking the assessment on Air Quality reference has been made to interim guidance produced by DEFRA (paragraph 13.3.15 of Chapter 13). Paragraph 13.3.17 of the same document states "pending publication of new guidance". Can the Applicant advise whether this remains interim guidance? If it has been updated please advise what changes have occurred and if this leads to any change to the AQ Chapter or the conclusions reached.	The interim guidance remains in place, DEFRA has not announced a date for publication of the final guidance.
Q6.0.2	The Applicant	**UK Health Security Agency (UKHSA)**	The United Kingdon Health Security Agency (HSA) was first contacted during the first, non-statutory consultation on 12 September 2023. They responded with their

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		The UKHSA did not provide a RR can the Applicant confirm that they were consulted, and provide details of the responses received.	feedback on 7 November 2023, requesting assessment of Electromagnetic Fields (EMF), which was then included in the PEIR, Chapter 7 Human Health. During the second, statutory consultation, the HSA was identified as a prescribed consultee under s42 (1)(a) and sent the s42 notice on 15 May 2024, and again on 17 June 2024 to announce that the consultation period had been extended. On 5 July 2024, the HSA responded to the project inbox with their feedback on the proposed development, noting that they had also provided feedback during the scoping stage directly to the Planning Inspectorate in November 2023. In this feedback, they requested a more detailed assessment of the EMF, but otherwise stated satisfaction with the approach taken in the PEIR. As detailed in Appendix J-1 of the Consultation Report [APP-161], page 92, Chapter 16 - Human Health [APP–045] Environmental Statement includes the detailed assessment of the effects of EMF on mental and physical health as requested by the HSA.
Q6.0.3	The Applicant	**Dust Management Plan** The OCEMP contains reference to the development and implementation of a Dust Management Plan (DMP) during the construction phase. Please provide an oDMP to enable the ExA to understand the mitigation measures that are likely to be in place during construction. Please explain why the oDMP should not be part of the overall mitigation package now, in light of the requirements in NPS EN-1 5.2.13.	The mitigation measures for the DMP are set out in ES Volume 2: Appendix 13.5 [APP-137] and are also set out in full in Table 3.9 of the oCEMP [APP-176]; they follow the best practice measures for a high-risk site following the IAQM construction dust guidance. The oCEMP in effect constitutes the DMP, as it contains all the available detail of the measures that would otherwise be contained in a DMP; thus, it does not have to be a standalone document. The DMP is therefore adequately secured as part of the overall mitigation package, by being secured as a sub-plan to the oCEMP, as the CEMP to be submitted for approval needs to be substantially in accordance with the oCEMP, which includes the provision for a DMP, and the provisions of the approved CEMP (including sub-plans approved as part of it) must be complied with under the requirement, meaning the sub-plans must equally be complied with. The approach to securing sub-plans as part of the construction, operational and decommissioning plans is a well established approach.

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Biodiversity, ecology and natural environment (including Habitats Regulations Assessment (HRA))			
Q7.0.1	The Applicant	**Connectivity across the site** Explain how animals would be able to traverse the site once security and perimeter fencing is erected. Is there a plan showing the potential 'corridors' for animal movement across the site? The Commitments register item C9 for badgers – every 150m -more frequent where they are known to be present – so what does that mean? Are regular trails used? Are they protected? Please explain what is actually to be provided and how this will ensure the animals are appropriately catered for, and how this is secured and subsequently maintained.	The areas to be subject to fencing are those that will support above ground infrastructure such as solar panels and the substation. The Site layout leaves large areas of land open within the Order Limits, including the mitigation areas and areas between aggregations of solar panels. This ensures that there are corridors of movement between fenced areas, including many of which follow features that are currently likely to be acting as wildlife corridors such as the River Trent, ditches and the Fledborough to Harby Dismantled Railway Local Wildlife Site. These can be seen within Appendix C Vegetation Removal Plans of the Outline Landscape and Ecology Management Plan [REP1-053]. The areas between fences will allow all wildlife to cross the solar park in all directions. Regardless of fencing the majority of wildlife will be able to access the entire area within the Order Limits other than within the substation. It is only deer that will be excluded from the fenced areas due to their size. Environmental measure C9 in Table 6.6 of Chapter 6 Biodiversity [REP1-023] allows for holes in the fence bottoms (gaps in the fence bottom framed by wood to create a permanent opening) to be created to allow animals such as badger, brown hare and foxes to move in and out of the fenced areas easily. Smaller animals (e.g. field voles, birds, bats, reptiles etc.) can either simply move through the type of mesh used or fly over the top. The holes created to allow passage of badgers etc. are specified to be 150m apart as this distance is small in comparison to distances typically travelled by these medium sized mammals on a daily basis. Allowance has been made for these to be placed at smaller distances in locations where activity may be expected to be higher than in the general surrounds, for example near to badger sett locations. This would be determined post consent through further survey of badger (see outline CEMP – Table 3.4: Ecology). These surveys would pick up existing mammal paths and existing habitats of higher potential and ensure that openings are in place to coincide with these. It is noted that badger gates (as per environmental measure C10 but with the addition of a hinged gate) are known to

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			be effective hence being included as a measure that the Government will pay farmers to install[1]. It is noted that the term 'gate' was removed from environmental measure C10 on the request of Nottinghamshire County Council in their Relevant Representation [RR-154] as openings are considered more effective. The Outline Landscape and Ecology Management Plan has been updated at Deadline 2 to note their inclusion. In addition, the Proposed Development includes new habitats to increase habitat connectivity across the Order Limits including the planting of approximately 13km of new hedgerow, new woodland, aggregations of trees and scrub (see the Outline Landscape and Ecology Management Plan [REP1-053]). Further, within the solar arrays the Proposed Development goes further than any known solar application by adding linear features in the shape of beetle banks into the developed area to aid movement of small mammals, herptiles, invertebrates etc. (see environmental measure C18 in Table 6.6 of Chapter 6 Biodiversity [REP1-023], which is secured via the outline Landscape and Ecology Management Plan, under Localised Features to be delivered [REP1-053]).
Q7.0.3	The Applicant	**Quality of Surveys** Can the Applicant respond to Nottinghamshire County Council (NCC) concerns on the field surveys and sampling approach in their relevant representation [RR-154] and clarify what scope further surveys will have in 2025 and how the results will be taken into account as part of the DCO process?	The Applicant considers that the survey programme undertaken between 2023 and 2025 is robust and provides sufficient information to identify the habitats and species present for which an Ecological Impact Assessment is necessary. Further, the data gathered provides the information necessary to ensure that potential effects can be avoided, minimised or mitigated for (including maintaining legal compliance during delivery). Further, the information provides adequate information to enable biodiversity enhancements to be designed appropriately that deliver wider benefits for local conservation priorities on a landscape scale.

[1] Countryside Stewardship prescription (online) available at FG14: Badger gate - GOV.UK

ExA Q Ref	Respondent	Question Summary	Applicant Response
		(In responding please cover each relevant species – e.g. reptile, bat, bird, otter, water vole.) Can the Applicant clarify how the surveying has captured potential rare/scarce bird species including ground nesting birds such as Skylarks and what assessment they have made of any impact the development may have on Skylark nesting territories following any mitigation.	In line with normal practice, the types of survey methods used have sampled the ecological features present, and where results have warranted, led to further survey types as necessary. With regards breeding bird surveys, a typical approach to recording the types, density and distribution has been undertaken. This survey approach is based on the British Trust for Ornithology's Common Bird Census, amended as per recommendations from the Bird Survey and Assessment Steering Group. Additional survey was required in 2025 due to the change in Order Limits over time reducing the extent of land that had been sampled. Additional survey data was provided at Deadline 1 [REP1-034]. Following the gathering of this data the assessment of breeding birds was updated with Chapter 6 Biodiversity [REP1-023] although the overall outcome did not change.
Q7.0.4	The Applicant	**Surveys** **Reptile Surveys** Can the Applicant clarify why no further reptile surveys were undertaken in areas beyond the chosen sampling locations. **Bats** Can the Applicant clarify the surveying methods and proposed mitigation, and further explain why no further bat transect surveys were undertaken in other areas within the Order Limits beyond the sampling locations that were chosen. **Otters** Can the Applicant provide information on the size of any buffers, and the location of artificial holts which may be impacted	<u>Reptile Surveys</u> The Applicant considers that the survey programme undertaken is robust and provides sufficient information to identify the species present for which an assessment for the potential for likely significant effects to occur and the measures necessary to ensure that the level of effect can be avoided, minimised or mitigated for (including maintaining legal compliance during delivery). Further, the information provides adequate information to enable biodiversity enhancements to be designed appropriately. The survey programme (common with all survey programmes for development) has not attempted to provide a catalogue of every species present or survey every location for all ecological features within the order Limits. Rather, in line with normal practice, the types of survey methods used have sampled the ecological features present, and where results have warranted, led to further survey types as necessary. It is notable that the conclusion of the assessment for reptiles in Chapter 6 Biodiversity [REP1-023] is Significant Beneficial. <u>Bats</u> Proposed mitigation and habitat enhancements for bats focus on the retention and enhancement of existing habitats that bats are known to use in the area (e.g.

ExA Q Ref	Respondent	Question Summary	Applicant Response
		during the decommissioning of the proposed development. **Water voles** Can the Applicant provide more details on the control of mink, including length of time and location as mitigation for water voles.	hedgerows and ditches), the provision of large amounts of newly created habitats (e.g. new hedgerows, scrapes, flower rich field margins etc.) that will provide better foraging and commuting habitat for this species group and new roosting opportunities (through the provision of bat boxes). Potential construction effects associated with disturbance by noise and lighting are also accounted for. The environmental measures described in Table 6.6 of Chapter 6 Biodiversity [REP1-023] (namely C1, C2, C3, C4, C5, C6, C8, C11, C14, C16, C17, C18, C19, C20, C21, C22, C24, C25, C27, C28, C29, C30, C31, C33 and C37) all provide measures to avoid, minimise, mitigate or enhance the local bat population and are secured via the outline LEMP [REP1-053] and outline CEMP [REP1-047]. Surveys for bats were undertaken in 2023 and 2024 and these sampled a range of habitats across the Order Limits. These surveys were designed to provide the following information – (1) a list of bat species present in the area, (2) an understanding of the type of habitats used most frequently by bats and (3) routes in which are used by bats frequently for commuting. The survey was aimed at sampling habitats, as opposed to full coverage (for example of every hedgerow) in line with guidance from the Bat Conservation Trust[2], in particular paragraph 8.2.3 that reads '*Activity surveys should provide a representative sample of the bat activity in all habitats present at the proposed development site, including open habitats. Even species strongly associated with linear features can use open landscapes (Finch et al. 2020). This seems more likely it is dark and predation risk is reduced (Downs et al. 2016b), but the degree of open landscapes has been less frequently studied. Sampling should be designed to provide sufficient data to assess the potential impacts of the development on bats.*' The information gathered from the surveys was accounted for in the design of infrastructure (e.g. stand-offs from woodlands, watercourses, hedgerows etc.) and the specification of the landscape design (e.g. provision of large lengths of new hedgerow), which are secured via the outline LEMP [REP1-053]. Collecting further data would not

[2] Collins

ExA Q Ref	Respondent	Question Summary	Applicant Response
			have altered the outcome of the assessment (Not Significant) or change the design given the positive approach taken to biodiversity. Otter The location of the two artificial otter holts described in environmental measure C26 in Table 6.6 of Chapter 6 Biodiversity [REP1-023] and secured via the outline LEMP [REP1-053], would be determined post consent. The reason for this is that the relevant internal drainage board would need to be consulted to ensure that they were content with the placement and the approach to installation. However, they would be located to ensure that the level of human disturbance would be minimal (i.e. not adjacent to a Public Right of Way), would be located in areas where natural cover is present but not abundant / dense (i.e. as otters are likely to prefer natural cover where available) and close (within 8m of water). Given the stand offs to watercourses, the potential for disturbance during decommissioning is considered minimal. However, this would be accounted for within the surveys that are specified within the Outline Decommissioning Environmental Management Plan (including restoration) [REP1-051]. Water voles The mink control measure has not been detailed at this stage, although discussions with Lincolnshire County Council have highlighted a project that is going to target the wider area to which the Project could contribute. At Deadline 1 environmental measure C23 (secured within the outline LEMP) in Table 6.6 of Chapter 6 Biodiversity [REP1-023] was updated to ensure funding would be provided for a minimum of ten years. The exact location of mink trapping points would be determined by an appropriately experienced professional.
Q7.0.5	The Applicant	**Ecology** Section 6.6.15 of the ES states that 92.5 percent (1,304 ha) of the Order Limits has been subject to detailed habitat survey. Paragraph 6.3.4 of the ES states that 105 ha of the Order Limits has not been	The Applicant used information from Appendix 6.2 Ecology Desk Study [REP1-030] and satellite imagery to understand the habitats and legally protected species likely present. This information informed the Ecological Impact Assessment (EcIA) process and also enabled this area to be included within calculations of Biodiversity Net Gain (see Appendix 6.10 Biodiversity Net Gain Assessment [REP1-040]).

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		subject to the survey because of restricted access focused on the High Marnham substation and surrounding areas. Can the Applicant clarify how information on the habitats for species surveyed with respect to the Extended Habitat Surveys for the Biodiversity chapter of the ES was established.	Although survey access would have been preferable it is necessary to note that the only potential construction activity to occur in this location is associated with the connection to the National Grid. National Grid is planning to construct a new substation close to the existing High Marnham substation as part of the North Humber to High Marnham project (case reference EN020034), which is itself part of the Great Grid Upgrade. These National Grid works will alter the baseline situation markedly, ensuring that the assessment provided in Chapter 6 Biodiversity [REP1-023] represents a worst-case as it is assuming the current habitats are present. The latest proposals see the proposed substation lying within the large arable field immediately to the west of the substation (see Brinsworth to High Marnham – Project Summary Document: High Marnham substation (April 2024) (available at https://rebuild.nationalgrid.com/document/354921/download). This means that the habitat that may be affected is a single arable field and potentially its boundary features. As described in paragraph 6.9.2 and environmental measure C2 (see table 6.6) of Chapter 6 Biodiversity [REP1-023] the local wildlife site and any other habitats of interest (e.g. hedgerows) would be crossed by trenchless techniques and is secured by the outline Construction Environmental Management Plan as updated for Deadline 2. Therefore, the only potential effects associated with a connection at this point is associated with the loss of arable land. This is not considered a particular constraint from the biodiversity perspective.
Q7.0.6	The Applicant	**Ecology** Paragraph 6.9.2 of the ES states that no habitat losses have been accounted for within the area of 'land for potential cable route' shown on the Illustrative Landscape Masterplan around the High Marnham Substation, on the basis that any habitats of interest such as hedgerows or scrub	There would be no need for active works to take place within any of the habitats of interest close to the point of connection. This is because access to either side of the Marnham Railway Yard Local Wildlife Site (LWS) (the area of interesting habitat to be crossed trenchlessly close to the grid connection point) can be taken directly in the field to the north of the LWS through an existing farm access on the unnamed road that runs between Low Marnham and Ragnall and to the south of the LWS using National Grid's existing access road to High Marnham substation.

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		would be crossed using trenchless techniques. Assuming that access to these habitats would still be required during construction even with using trenchless techniques, can the Applicant clarify how any loss of sections of hedgerows and other habitat will be mitigated for so that how there will be no potential habitat losses in the area around High Marnham Substation.	The only potential loss of habitat at the grid connection point would be arable farmland based on National Grid's current proposals. However, this loss would either be small and temporary or National Grid's own works will have removed the habitat ahead of connection.
Habitats Regulations Assessment (HRA)			
Q8.0.1	The Applicant	**Shadow HRA (sHRA)** In providing the sHRA the detailed information expected in line with the advice on the National Infrastructure website would appear not to have been provided in full. Please identify where the following can be found, or provide them • a summary table of all European sites and qualifying features and each pathway of effect considered at each HRA Stage for each phase of the proposed development (construction, operation, and decommissioning, as relevant);	This information has been added to an appendix (Appendix A.2: Information Requirements) within the Shadow Habitats Regulations Assessment [REP1-019] for publication at Deadline 2.

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		• a copy of the citation/Natura 2000 data sheet for each European site; • a copy of the conservation objectives for all European sites for which LSEs have not been excluded and have been carried forward to HRA Stage 2; • a plan of the European site or sites potentially affected in relation to the proposed development (regulation 5(2)(l)(i) of the APFP Regulations); and evidence (such as Evidence Plans, copies of correspondence, agreement logs, PADSS or SoCG) of agreement between the applicant and relevant ANCBs (including those in devolved administrations and/or relevant bodies in EEA States, where applicable) on the scope, methodologies, interpretation, and conclusions of the screening assessment.	
Q8.0.2	The Applicant	**sHRA**	This information has been added to an appendix within the Shadow Habitats Regulations Assessment [REP1-019] for publication at Deadline 2.

ExA Q Ref	Respondent	Question Summary	Applicant Response
		The conservation objectives and qualifying features for the designated sites and their conservation status have been provided in the SHRA in paragraphs 3.1.4 and 3.1.5 but have not obviously been supported by the Natura 2000 citations or a summary table of the sites and qualifying features and each pathway of effect considered at each HRA Stage for each phase of the proposed development (construction, operation, and decommissioning, as relevant). Please identify where they can be found or provide them.	
Q8.0.3	The Applicant	**sHRA** The sHRA states that depth of burial of transmission cables is likely to be effective in ensuring that neither EMF or heat alter the behaviour of adult or juvenile lamprey. It is not made clear what depth of cable burial is considered effective as mitigation or how this is to be secured. The oCEMP specifies that this would be 5m, what evidence is there that the depth	The Shadow Habitats Regulations Assessment [REP1-019] discuss the burial depth at paragraphs 4.1.6 and 4.1.7. This discussion is framed by evidence provided in the Risk Assessment of EMF Impacts on Fish produced as an appendix to the 'Applicants written responses to Written Representations and Other Submissions at Deadline 1' as part of the examination for the West Burton Solar Project[3]. This concludes (at 2.4.1 and 2.4.2) '*2.4.1 Electric fields generated by the proposed cable are not likely to be perceived beyond the armouring of the cable itself, and certainly not beyond the 5m buried depth below the riverbed, therefore potential effects* *of electric fields on fish are not considered likely.2.4.2 Magnetic fields likely produced by the cable are highly likely to be within permitted exposure limits and induced electric fields are likely to be minor. The burial depth is five times greater than that typically used for similar installations, which is considered to significantly*

[3] EN010132-001329-WB8.1.17 Response to Written Representations at Deadline 1 Part 1.pdf

ExA Q Ref	Respondent	Question Summary	Applicant Response
		specified would achieve the necessary mitigation?	*mitigate EMF risks*.' This conclusion is discussed and considered appropriate by the Secretary of State in their decision letter (paragraphs 5.14 to 5.29)[4].
Q8.0.4	The Applicant	**sHRA** The potential for in-combination effects with other nearby proposed developments and other plans and projects to result in adverse effects on river and sea lamprey is considered 'very low' (paragraphs 4.1.8-4.1.12, Doc 5.2). Please clarify which other projects or plans have been included in the sHRA assessment of in-combination effects.	At Deadline 1 the Shadow Habitats Regulations Assessment [REP1-019] was updated to note the developments considered in-combination at paragraph 4.1.11. The projects considered were the West Burton Solar Project, Cottam Solar Project and Gate Burton Energy Park. in the changes made are consistent with the West Burton Solar Project 'Information to support a Habitats Regulations Assessment'[5], and equivalent document for the Cottam Solar Project[6]. The Gate Burton Energy Park Habitats Regulations Assessment[7] did not identify any plans or projects for consideration in-combination.
Q8.0.5	The Applicant	**Outline Construction Environmental Management Plan (oCEMP)** Please provide clarification of the mitigation measures set out in the oCEMP (Doc 7.4) that would be relied on to avoid potential harm to the river and sea lamprey associated with the Humber Estuary Ramsar site and SAC.	Table 3.5 of the Outline Construction and Environmental Management Plan outlines the measures to provide mitigation for the effects of construction on river and sea lamprey. These include: (1) A minimum stand-off of 16m from the bank top of the River Trent to the closest construction works (noting that the closest works to the river would inevitably be the temporary fencing). (2) Minimum depth of 5m below river bed level. (3) Measures to manage pollutants such as run-off, dust and fuels.

[4] EN010132-002064-Decision letter.pdf

[5] EN010132-001326-WB7.18_A Information to Support a HRA Revision A (Tracked).pdf

[6] EN010133-001455-C7.20_A Information to Support a Habitats Regulations Assessment.pdf

[7] Gate Burton Habitat Regulation Assessment

ExA Q Ref	Respondent	Question Summary	Applicant Response
		The oCEMP recognises there is a *"small risk of drilling fluid breakout to the watercourse"*. Can the Applicant and NE provide more detail on how this has been assessed in respect of the potential for any harm to the river or any species	(4) Provision of a fluid breakout plan and emergency spillage response procedure. These measures would be in place alongside the design and delivery as described within the Outline Export Cable Construction Method Statement [APP-185]. Whilst these measures cannot completely exclude the potential for breakout to occur, they would be effective in managing the risk. The fluid breakout plan would ensure that a high degree of monitoring of the operation would take place (of within bore pressures) enabling any losses of drilling fluid to be minimised and at a level where they would be highly unlikely to cause a negative effect due to the high volumes of water present and the already turbid waters in the River Trent.
Q8.0.6	The Applicant	**sHRA** Please provide evidence of the consultation undertaken with Natural England	The summary of consultation activities with Natural England are included in the Consultation Report [APP-151] as well as Chapter 6 – Biodiversity [APP-035]. Natural England was first contacted during the first, non-statutory consultation on 12 September 2023, but did not provide feedback at this stage. 5 February 2024, the Applicant met with Natural England and provided a project overview and described the approach to assessment and agreed the Discretionary Advice Service inputs. During the second, statutory consultation, Natural England was identified as a prescribed consultee under s42 (1)(a) and sent the s42 notice on 15 May 2024, and again on 17 June 2024 to announce that the consultation period had been extended. 3 June 2024, the Applicant held another meeting with Natural England to discuss the baseline, local conservation priorities, and BNG. There was agreement on the BNG and habitat creation for location conservation priorities as well as the extent of baseline data.

ExA Q Ref	Respondent	Question Summary	Applicant Response
			On 8 July 2024, they responded with their feedback to the statutory consultation. In January 2025, there was a followup meeting with Natural England and the local authorities to discuss the approach to habitat creation and enhancement, which was recognised as generally appropriate with suggestions for individual protected species. Post-application a meeting was held on 14 July 2025 to discuss issues raised within Relevant Representations with Natural England and the Local Planning Authorities.
Q8.0.7	The Applicant	**Humber Estuary SAC/ Ramsar** Can the Applicant respond to NCC's concerns and clarify why a minimum buffer of 16m from the River Trent is considered sufficient to avoid direct impacts from construction and decommissioning runoff and drilling breakout fluid?	The 16m stand off from the bank top of the River Trent was determined as it represents the stand-off distance required to ensure that an environmental permit from the Environment Agency would not be necessary for works such as site investigation boreholes and trial pits. The site investigation boreholes include those that could be driven with a percussive rig. Construction works close to the River Trent for the Proposed Development are associated with the trenchless crossing of the river. These works would be temporary, with the majority of activity being associated with compound mobilisation and demobilisation (as opposed to the drilling itself). The surface works are at a distance where adequate control of pollutants such as run-off and dust could be adequately controlled. Noise and vibration would be minimal at this distance during the set-up period. The trenchless crossing itself may lead to noise and vibration at the riverbed for short periods of time, although as addressed in paragraph 6.10.6 of Chapter 6 Biodiversity [REP1-023] this is unlikely to result in adverse effects on river or sea lamprey. Break out of drilling fluid is a risk of all horizontal directional drills. However, the risk is managed through a number of measures including ensuring that the drill passes at least 5m below riverbed level (see Environmental measure C2 in Table 6.6 of Chapter 6 Biodiversity [REP1-023]) and design, management and

ExA Q Ref	Respondent	Question Summary	Applicant Response
			monitoring measures described Table 3.5 of the Outline Construction Environmental Management Plan [REP1-047].
Q8.0.8	The Applicant	**Lamprey** Can the Applicant respond to NCC's concerns and clarify why a 5-year monitoring program is considered sufficient to monitor any barrier impacts from EMF to the lamprey population within the River Trent?	The 5-year monitoring period was determined based on the agreements reached between Natural England, the Environment Agency and other Nationally Significant Infrastructure Projects that will have electrical transmission cables under the River Trent. The Applicant mirrored this approach to ensure that Natural England and the Environment Agency could agree to the conclusions drawn in the Shadow Habitats Regulations Assessment [REP1-019], as they had previously for projects such as the West Burton Solar Project – see Statement of Common Ground with the Environment Agency[8] and Natural England[9]. It is noted that Natural England confirm that they are content that there will not be an adverse effect on the integrity of the Humber Estuary SAC and Ramsar site by the Proposed Development within their Risks and Issues Log [REP1-107].
Q8.0.9	Natural England and the Applicant	**Humber Estuary SAC/Ramsar and Lamprey**	The 16 m stand-off to the River Trent is secured through Requirement 13 of the draft DCO [REP1-007] and the Outline Construction Environmental Management Plan (in particular table 3.5) [REP1-047]. The Applicant will ensure all documents are consistent by Deadline 2. The 16m would be measured from the bank top as water levels fluctuate. This is in line with how the stand off distances are measured for environmental permit applications to the Environment Agency.

[8] EN010132-001847-West Burton Solar Project Limited - Final Statements of Common Ground in clear and tracked changes versions 3.pdf

[9] EN010132-001745-West Burton Solar Project Limited - Any further information requested by ExA 7.pdf

ExA Q Ref	Respondent	Question Summary	Applicant Response
		We note that NE appear to have agreed with the approach of the Applicant in considering both the previous questions. Could NE/Applicant please provide an explanation why 16m would be considered a suitable set off distance and why in respect of lamprey and their life cycle 5 years would be regarded as suitable timeframe to understand any effects. Within the D1 submission of the Outline Design parameters Document (page 12) it now states "Installation *of the 400kV cables beneath the River Trent will be at least 5m below the lowest surveyed point of the bed of the river and set back at least 10m from the water edge*" This distance is repeated for Work No. 5. Can the Applicant explain how the distance of 10m complies with the 16m set off distance? The water edge on a tidal river would not appear to be a set point – so clarity and consistency is required in respect of both the Outline Design Parameter and the ES.	
Compulsory acquisition, temporary possession and other land or rights considerations			
Q9.0.1	The Applicant	**Funding Statement**	(1) This is a typographical error and has been corrected in the new revision of the document at Deadline 2. (2) This statement is correct.

ExA Q Ref	Respondent	Question Summary	Applicant Response
		(1) Paragraph 1.1.2 has no text is this just a typographical error/formatting issue? (2) Paragraph 2.1.1 states One Earth Solar Farm Limited is registered in England and Wales, as is the majority shareholder One Earth 740 SPV Limited. This according to paragraph 2.1.3 is a special purpose vehicle. From the flow chart (Appendix A) there appears to be only 2 shareholders, each with a 50% ownership, does this remain correct? (3) While the financial statement has been provided for Orsted, none has been provided for Padero Solar limited. Please explain why this is the case. (4) The flow chart lists the parent company as Padero Solar Limited, however paragraph 2.1.2 and 2.3.1 says it is Padero Solaer Limited, please clarify which is correct (5) According to Companies House Padero Solar Limited was liquidated on 14 April this year. Please provide an update on the funding statement. (6) In light of the above please provide further detail how the	(3) While the exact funding arrangement for the Proposed Development has not been confirmed at this stage, the financial statement of Orsted Onshore Holding A/S was provided with the Funding Statement **[APP-009]** as the main funding entity for the Applicant, as is typical with Solar DCOs. However, for completeness the relevant financial statement for Padero Solaer has now been included in the updated version of the Funding Statement [EN010159/APP/4.2.1]. (4) This is a typographical error in the flow chart. Paras 2.1.2 and 2.3.1 are correct. It is Padero Solaer (company number 08021337). (5) Reference to Padero Solar was a typographical error all reference should be to Padero Solaer (company number 08021337). This will be corrected in the new revision of this document at Deadline 2. (6) Noting the responses to the above questions, the Applicant's position remains as set out at 7.10 of the Statement of Reasons **[REP1-011]**, in particular that: a. The Applicant has demonstrated it has the ability to procure the financial resources required for the Proposed Development, including the cost of acquiring any land and rights, and payment of compensation as applicable. b. Article 46 of The Draft DCO also places restrictions on the Applicant that prevent it from exercising powers in relation to the compulsory acquisition of land and temporary possession rights (Articles 21, 23, 24, 29, 30, 31, 32) until it has either put in place a guarantee or other form of security approved by the Secretary of State. This ensures compensation is available before it is owed and those powers are exercised.

ExA Q Ref	Respondent	Question Summary	Applicant Response
		scheme is proposed to be funded, and deliver on financial commitments to meet the legal tests for CA.	
Q9.0.2	The Applicant	**Funding** Paragraph 18 of the CA Guidance states that Applicants should be able to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition within the statutory period following the order being made, and that the resource implications of a possible acquisition resulting from a blight notice have been taken account of. The Funding Statement [APP-009] only identifies the total cost of the project but does not differentiate costs of land acquisition (including compensation payable in respect of any compulsory purchase). It nevertheless, states that should any claims for blight arise because of the Application, the Applicant has access to sufficient funds to meet the cost of acquiring these interests at whatever stage they are served. Does the estimate include an allowance for contingent costs and inflation? What allowance has been made for potential blight claims?	The Funding Statement **[APP-009]** at paragraph 2.2.3 confirms that the estimate includes an allowance for inflation and project contingencies. Paragraph 2.4.4 of the Funding Statement also confirms that the Applicant has sufficient funds to meet the cost of acquiring interests as a result of blight claims. However, no interests have been identified that could be eligible to serve a blight notice. Article 46 of the Draft DCO **[REP1-007]** requires the Applicant to put in place financial security in respect of compensation liabilities, prior to exercising any of the relevant powers of compulsory acquisition (should they be granted). With reference to the potential exceedance of forecast cost – the Applicant is confident both the forecast and robust programme management capability and believe his to be unlikely event. However, in this event the proposed development tis backed by organisation with string balance sheets and diverse divers funding sources that would enable additional capital to be raised. The Funding Statement demonstrates that funding is available to construct the Proposed Development based on typical solar PV technology expected to be utilised. To the extent that solar PV panels become more efficient may inform the layout, number, and types of panels utilised at detailed design. The Order Limits are intended to reflect the maximum extent required for the proposed generation output, with the DCO providing some degree of design flexibility, including to recognise that solar PV technology could become more efficient over time. There could be a range of reasons that the full extent of the Order Limits are not utilised by the Applicant, on the basis that it reflects the worst case scenario design envelope for managing effects, while meeting the needs of the Proposed Development. However, the Funding Statement has already allowed for potential changes in cost, so this is unlikely to be something that reduces the extent of the Proposed Development.

ExA Q Ref	Respondent	Question Summary	Applicant Response
		What reassurance can be provided of funding being available should the costs be exceeded? What reassurance can be provided that the extent of the Proposed Development would not be reduced in response to any future changes in costs or available funding?	As set out in the Applicant's response to Q4.0.2 there is also a natural, commercial incentive on the Applicant to ensure it maximises the available grid connection under its grid connection agreement and makes the most efficient use of the land available to it. The Secretary of State's decision letter making The Little Crow Solar Park Order 2022 discusses this point from paragraph 4.27 to 4.37. If at detailed design some reductions to the extent of the Proposed Development presented the most commercially viable and efficient generation output option, while still complying with the DCO and managing effects appropriately, then the DCO provides the flexibility for this to occur. However, as noted by the Secretary of State in the Little Crow Solar Park Order 2022 Decision Letter, there is no basis for minimum or maximum generating capacities to be imposed on the Applicant through the DCO.
Q9.0.3	The Applicant	**Book of Reference (BoR)** The BoR has a number of entries both within Category 1 and Category 2 where the owner of land and rights is recorded as unknown. Please could the Applicant set out what further steps will be undertaken up to the end of the Examination to identify unknown ownership, occupation, or interests in land?	The Applicant can confirm that there are no plots where they have not been able to identify any reputed legal or beneficial interest in the land. There are a number of unregistered plots where the Applicant has identified the owner(s) or the reputed owner(s) through diligent inquiry. The Applicant conducted diligent inquiry as described in the Statement of Reasons [REP1-011]. However, for unregistered land, the Applicant has also included an "unknown" entry in the Book of Reference as a conservative approach, and for these plots during Section 42 Consultation and at the Section 56 Notification stage, site notices were erected and maintained. The Applicant will continue to undertake enquiries, including through contact with adjoining owners and their agents, and will continue to maintain the Book of Reference [REP1-013] throughout Examination should any new parties make themselves known.
Q9.0.4	The Applicant	**Land Rights and Interests**	The Applicant has included the latest progress on Protective Provisions and land rights negotiations in the Land Rights and Negotiations Tracker [REP1-015]. As

ExA Q Ref	Respondent	Question Summary	Applicant Response
		Please could the Applicant provide updates to the following matters: Schedule of progress regarding any outstanding matters, objections, and agreements in relation to land rights; and Schedule of progress regarding Protective Provisions and Statutory Undertakers. Please can the Applicant ensure that any changes to the BoR are, where necessary, carried through to the Statement of Reasons (SoR)	requested and noted in our response to ExQ1 9.0.9, the Applicant has also included its preferred Protective Provisions in the Draft DCO [APP-007]. The Applicant can confirm that changes made to the Book of Reference at Deadlines 1 and 2 have been reflected in the Statement of Reasons [REP1-011]
Q9.0.9	The Applicant (1) and (2), Exolum Pipeline Systems Limited (3)	**Exolum Pipeline Systems Limited** Please explain the asterisks included in the list of land plots within the Land Rights Tracker. In light of the WR at D1 from Fisher German on behalf of Exolum please advise on the latest position in respect of any Protective Provisions Please provide a draft of your preferred Protective Provisions and explain any distinction between what the Applicant has proposed and provide a justification as appropriate for the preferred wording proposed.	The asterisks next to plot numbers in the Land Rights Tracker [REP1-015] indicate that those plots are currently unregistered, as included in Page X of the Land Rights Tracker [REP1-015]. Negotiations on an agreed set of protective provisions are ongoing. The Applicant has provided comments on a revised draft set to Exolum, with Exolum currently reviewing. As requested, the Applicant has also included its preferred Protective Provisions in the Draft DCO [APP-007], including protective provisions for Exolum.
Q9.0.10	The Applicant All Statutory Undertakers	**Protective Provisions**	The Applicant can confirm that all Protective Provisions currently being negotiated have been progressed since Deadline 1, with the latest progress recorded in the Land Rights and Negotiations Tracker [REP1-015].

ExA Q Ref	Respondent	Question Summary	Applicant Response
		The ExA understand that conversations are being undertaken between the Applicant and various parties	
Q9.0.12	The Applicant	**Equalities Act 2010** Please could the Applicant summarise how it has had regard to the Equalities Act 2010 in relation to the powers sought? Have any Affected Persons or Interested Parties been identified as having protected characteristics and, if so, what regard has been given to them?	Where Affected Persons self-disclosed in Relevant Representations that they shared a protected characteristic, the Applicant has sought to mitigate potential effects. For example, where it was disclosed that a horse rider with autism had concerns about the impact of the Proposed Development on their enjoyment on riding, measures were sought to mitigate these (for example, following British Horse Society Guidance on corridor width).
The draft Development Consent Order (DCO)			
Articles			
Q10.0.1	The Applicant	**Article 13** This article provides powers to allow any private road within the Order Limits to be used temporarily during the construction and maintenance of the proposed development. Please explain why this is necessary and why all private roads in the Order Limits are subject to this power.	The power is considered necessary and appropriate as it allows the Applicant to make use of existing roads for the construction and operation of the Proposed Development, limiting the extent to which it needs to create new access tracks and therefore limiting environmental impacts.
Schedule 2 – Requirements			
Q10.2.1	The Applicant	**Requirement 6**	Requirement 6 requires the Applicant to establish and administer a community liaison group, in accordance with terms of reference approved for the group by the relevant planning authority, with the aim of facilitating liaison between

ExA Q Ref	Respondent	Question Summary	Applicant Response
		Please explain how this requirement meets each of the tests to satisfy the legal criterion for a requirement.	representatives living in the vicinity of the Order limits, throughout the construction, operation and decommissioning of the authorised development. The need for this group is in response to various potential impacts of the Proposed Development, with the intention of minimising impacts particularly on local residents by being able to give advanced warning of effects, so that people may have an opportunity to plan around them or generally have a "heads up", and equally for local residents to feedback on effects that occur, so that the Applicant has the opportunity to address concerns or issues as quickly as possible as they arise. The community liaison group could be used in this respect for example in relation to impacts from construction traffic, noise or impacts on public rights of way. It is one of several means by which environmental impacts can be mitigated. The terms of the requirement are precise and enforceable, as there will be specific terms of reference approved, which will set out details such as when and how the group would meet or share information, and the Applicant would keep a record of its administration of the group in order to demonstrate compliance should any concerns be raised by local authorities, residents or members of the group. In that way, the requirement is enforceable, as the local authority would be able to determine whether the terms of reference were being complied with, and could require those terms to be complied with by an enforcement notice if they had concerns the requirement was not being complied with.
Schedule 3 Legislation to be disapplied			
Q10.3.2	The Applicant Trent Valley IDB	**Internal Drainage Board** The Trent Valley IDB make reference in their D1 submission to bylaws operative within the area, and the potential for Protective Provisions for the IDB.	Under Article 6 of the Draft DCO **[REP1-007]**, the provisions of any byelaws made under section 66(c) of the Land Drainage Act 1991, or paragraphs 5, 6 or 6A of Schedule 25 of the Water Resources Act 1991 are proposed to be disapplied. As set out at paragraph 4.2.14 of the Explanatory Memorandum **[REP1-009]**, these disapplications are sought on the basis that they address matters that are anticipated to be resolved through protective provisions.

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		Can both parties advise of their current position in respect to whether the dDCO adequately addresses the issues the bylaws are intended to protect, and Whether Protective Provisions are considered necessary to safeguard the IDBs interests. Subject to the answer to (2) the progress or otherwise on any negotiations in respect of protective provisions	The Applicant is actively negotiating with TVIDB regarding the terms of its preferred protective provisions, which are currently with TVIDB for review. Engagement will continue until the provisions are formally agreed.
Historic environment			
Q11.0.1	The Applicant, Historic England, LCC, NCC	**Extent of investigation** NPS EN-3 at paragraph 2.10.113 states "*the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.*" Can each party provide evidence to support their position in respect of the suitability of the investigations that have been undertaken, and why either further trial trenching or other form of	Please see the note provided at Appendix B.

ExA Q Ref	Respondent	Question Summary	Applicant Response
		investigation should or should not be carried out.	
Q11.0.2	The Applicant 1,2 and 4 The Councils and Historic England 3 and 4	**Design Proposals/ Alternative Foundation Designs** (1) The application appears to indicate that piles will be used for the foundations for the supporting frames for the solar panels. Have alternative solutions been explored such as shoes as referenced in paragraph 2.10.110 of NPS EN-3 and Historic England 2021 Commercial renewable energy development and the historic environment. Historic England Advice Note 15. Swindon. Historic England.? (2) If the use of 'shoes' has not been investigated, please provide an explanation of their suitability or otherwise in the context of this proposal. (3) Can HE and the Councils advise whether the use of 'shoes' (if confirmed as an appropriate method of securing the panels) would overcome the concerns identified in respect of the extent of investigations? (4) Is there an agreed position on what is regarded as low level piling? And whether the 3m depth specified by the Applicant would be regarded as low level piling?	With respect to Part (1), Paragraph 9.5.4 of ES Chapter 9: Buried Heritage [APP-038, p.41], and footnote 6 of ES Chapter 9: Buried Heritage [APP-038, p.41] make allowances for the use of concrete footing as part of the Environmental Measures proposed. As suggested by Commercial Renewable Energy Development and the Historic Environment: Historic England Advice Note 15: 'Mitigation may be possible; for example, the use of concrete bases for the modules, which entail less ground disturbance'. Planning guidance published by BRE supported by Cornwall Council notes that: "Where possible Solar PV arrays should be installed using 'pile' driven or screw foundations, or pre-moulded concrete blocks (shoes), and capable of easy removal. The use of shoes may be required for archaeological sensitive areas". In relation to Part (2) Areas of Archaeological Constraints (AAC) will be identified in the Archaeological Mitigation Strategy (AMS), and where suitable, concrete shoes will be considered as potential Environmental Measure to mitigate effects on Buried Heritage Assets. Typically disturbance caused by piling may have a material effect only in quite limited circumstances related to especially rare and sensitive buried archaeological remains. Concrete shoes may be used in those instances where avoidance is not possible in order to minimise or avoid adverse impacts. Based on the Applicant's assessments, there are limited instances where concrete shoes would be needed, however, as set out above, the Applicant has included this possibility in its mitigation proposals. In relation to Part (4) in the context of paragraph 2.10.110 of EN-3 and the reference to low-level piling, the Applicant is not aware of a clear definition in this respect and is not necessarily dependent upon the pile depth – although low-level

ExA Q Ref	Respondent	Question Summary	Applicant Response
			piling is not considered a suitable form of mitigation due to the depth of the archaeological deposits mostly recorded between 0.4m and 1m below current ground level. Therefore, the Applicant does not rely upon low-level piling as a form of mitigation for archaeology and, as made clear above, there is the potential for concrete footings to be used rather than piles where such mitigation is required for archaeology, avoiding ground intrusive impact.
Q11.0.3	The Applicant NCC LCC	**Archaeology** Paragraph 2.10.137 of NPS EN-1 states that the ability of the Applicant to microsite specific elements during the construction phase should be an important consideration by the SoS when assessing the risk of damage to archaeology. (1) Please could the Applicant provide its consideration of the potential for micrositing, including the practical feasibility in relation to the foundations of the solar panels? (2) Please could the Applicant ensure that any micrositing mitigation is explicitly secured in the Outline CEMP? (3) Could the County Archaeologists comment please?	(1) The Applicant's position is that the Proposed Development retains enough flexibility to accommodate any significant archaeology discovery during the additional evaluation work to be carried out post-consent. All the Environmental Measures proposed will be secured in the Outline Construction Environmental Management Plan. Specifically, Paragraph 9.5.4 of the ES Chapter 9: Buried Heritage [APP-038, p.41] makes allowances for the use of micrositing of pile. (2) Micrositing, along with all the proposed Environmental Measures will be secured in the Outline CEMP, which will be informed by the Archaeological Mitigation Strategy (AMS).
Q11.0.4	The Councils, the Applicant	**Non Designated Heritage Assets** Can the Councils confirm they are content all non designated heritage assets have been properly identified and considered as part of the heritage assessment?.	NSDC requested the inclusion of the former North Clifton Station as an NDHA in December 2023. This was subsequently included in the scope of assessment which was agreed by all local authorities including NSDC, as set out in ES Chapter 10 (**APP-039**, Table 10.5). The baseline of the Cultural Heritage Desk-Based Assessment, which included North Clifton Station, was provided as part of

ExA Q Ref	Respondent	Question Summary	Applicant Response
		The WR at D1 from The Station makes reference to North Clifton Station and the Station Masters House, indicating both properties form a group, the ES Chapter 10 in section 10.6 appears to only reference the Station, is further assessment required?.	the PEIR and no further comments were received on the scope of NDHAs or North Clifton Station from NSDC or NCC during Statutory Consultation or subsequent engagement. To confirm, whilst not explicitly differentiated, North Clifton Station has been considered as a grouping, including the former station building and the Station Masters House. As the two buildings were built concurrently as part of the same station complex in c.1898, their significance is heavily interlinked. It is assessed at ES Chapter 10 (**APP-039**, paras 10.6.101 - 10.6.103) and in the Cultural Heritage Desk-Based Assessment (Part 2, **APP-128**, pp.103-104). As set out in NPS EN-1 at para.5.9.10, the level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impacts on their significance. The information provided is considered to be proportionate to understand the potential impact on their significance. Further assessment work would not alter the overall level of significance of this grouping (found to be very low – low), nor the overall impact of the Proposed Development (negligible adverse in EIA terms / a minor degree of harm in non-EIA terms which would need considering in the balanced judgement set out in NPS EN-1 para. 5.9.33).
Hydrology and hydrogeology and the Water Environment			
Q12.0.1	The Applicant	**FRA** Following Acceptance of the application, s51 advice was issued, which stated "A figure in the FRA distinguishing which areas of the proposed development's order limits are within Flood Zone 3a and Flood Zone 3b is required." Please provide this plan and states the area of land within the Order Limits which is in flood zones 3 and 3b.	Figure 3-7 has now been included within the updated FRA submitted with Deadline 2 which clearly sets this out. For clarity, the Flood Zone areas within the order limits are summarised below: • Flood Zone 3a – 622 ha, equating to 44.1% of the Order Limits area. • Flood Zone 3b – 51 ha, equating to 3.6% of the Order Limits area.

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Q12.0.2	The Applicant	**Flooding of properties** [RR-038] refers to flooding of gardens in properties at Roberts Close when the field has not been maintained. Please explain how this issue been considered? And How the dDCO ensures appropriate maintenance of field drainage is accounted for?	With regards to ensuring maintenance is undertaken of existing watercourses (including field drainage), this is secured within the Outline Landscape and Ecology Management Plan (oLEMP) for which an updated version (7.7.2 – Rev 03) is being submitted at Deadline 2. As riparian owner of the watercourses within and running directly adjacent to the Order limits, there is a requirement to ensure that normal flow is not impeded and that the watercourse will be able to accept upstream flows and transfer them downstream without obstruction, pollution or diversion. The oLEMP sets out that the following management and maintenance will be undertaken: • The clearance of any silt build-up as required (outside of the main bird breeding season), with the aim of clearing no more than one third of each ditch in each year, and from one bank/side only. • Bankside vegetation will be cut every other year (in autumn), alternating from one bank, to the opposite bank, maintaining vegetation cover all year round. • Removing obstructions to ensure normal flow is not impeded. • Maintaining the beds and banks of the watercourse. • Maintaining any structures such as culverts, bridges and outfalls.
Q12.0.3	The Applicant	**Flooding of adjacent land** [RR-044] states the landowner has a drainage dyke on their land which takes water from within the red line boundary. Please explain how this has been considered and any future maintenance secured?	The updated FRA submitted at Deadline 2 [7.7.2 – Rev 03] includes a full assessment of flood risk from all sources and confirms that there will be no increase in flood risk to the Site or off site areas from sewers, groundwater and artificial sources as a result of the proposed development. With regards to fluvial flood risk, the updated FRA indicates that there would be a negligible impact on flood risk which is within model tolerances agreed with the EA. Furthermore, the FRA includes a surface water drainage design and concludes that with mitigation in place, there will be a negligible impact of the natural surface water runoff regime.

ExA Q Ref	Respondent	Question Summary	Applicant Response
			As set out above, the Applicant is the riparian owner for watercourses within and running directly adjacent to the Order limits. With this in mind, the Applicant is required to maintain the watercourse referred to, within the Applicant's Order limits. The management and maintenance requirements set out in the oLEMP have been summarised in response to Q12.0.2 above however, there maintenance of watercourses outside the order limits is not the responsibility of the Applicant.
Q12.0.6	The Applicant, Environment Agency, the Councils.	**Water Framework Directive** NPS EN-1 states at paragraph 5.16.14 *"The Secretary of State should be satisfied that a proposal has regard to current River Basin Management Plans and meets the requirements of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (including regulation 19). The specific objectives for particular river basins are set out in River Basin Management Plans. The Secretary of State* ***must refuse development consent*** *where a project is likely to cause deterioration of a water body or its failure to achieve good status or good potential, unless the requirements set out in Regulation 19 are met. A project may be approved in the absence of a qualifying Overriding Public Interest test only if there is sufficient certainty that it will not cause deterioration or compromise the achievement of good status or good potential." (****our highlighting****)*	The Water Framework Directive (WFD) Screening Assessment [APP-097] was submitted by the Applicant within the original submission. A summary of the objectives of the Humber River Basin Management Plan is provided within Section 2.2.1 of the WFD Screening Assessment [APP-097]. Based on the WFD Screening Assessment, the Applicant concludes that with embedded measures implemented, neither the construction or operational stages of the development will cause or contribute to deterioration of the existing watercourses or groundwater bodies or jeopardise their potential to achieve good status. On the basis that the Applicant considers the development will not cause or contribute to deterioration of existing waterbodies or jeopardise their potential to achieve good status, it is not considered that Regulation 19 is required. Through consultation emails with the EA (received 12th August 2025), they stated they are *"going through the WFD Assessment at the moment so we should be able to get a response over to you soon."* Although a response is still awaited, we are hopeful that comments will be provided imminently, and next steps with the EA (if any) can then be agreed.

ExA Q Ref	Respondent	Question Summary	Applicant Response
		Can each party advise on its position in respect of the Proposed Development, it's relationship to any relevant River Basin Management Plan and the requirements of the WFD. Can each party confirm their position in respect of whether there is likely to be any deterioration of a water body, or that any water body would not achieve a 'good status' or 'good potential' as a consequence of the Proposed Development, and The relevant position in respect of whether Regulation 19 is /would be met? In light of the current position of the Stage 1 WFD screening assessment recently submitted to the EA, whether it is likely the outcome of the screening assessment will be known prior to the end of the examination.	
Q12.0.7	The Applicant Anglian Water	**Water Resources** We note the content of page 37 of the oCEMP, stating that if demand for potable water exceeds 20m3/day, then a Water Resource Assessment will be produced. What are the implications for the delivery of the project in the event that the scheme were to require in excess of 20m3/day?	As set out in within Items 7.6.49 and 7.6.50 of Chapter 7: Hydrology and Hydrogeology of the ES [AS-053], it is not anticipated that water demand will exceed 20m^3/day. Water demand has been conservatively estimated to be approximately 7.4m^3/day in the operational period which is significantly less that the Anglian Water's requirements for a Water Resource Assessment (WRA). It is not anticipated therefore, that Anglian Water will decline to supply water for the operational site. We don't expect there to be a programme delay because of this item, as conservative estimates are not currently exceeding the threshold. As set out in within Items 7.6.24 of Chapter 7: Hydrology and Hydrogeology of the ES [AS-053], water demand during construction has been conservatively calculated to be 64.8m^3/day. As indicated by 7.6.27, wherever possible, water is

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		In the absence of the WRA at this stage can the SoS be satisfied that the project could be delivered within the time frames currently proposed – i.e to be operational by 2029? Please explain in the absence of this information at this stage how the scheme complies with the tests in EN-1.	to be sourced from non-potable sources (this could include using the existing abstraction licences from the River Trent) or private supplies to reduce the pressure on demand from the water company however, the feasibility of this is to be confirmed at detailed design. It is worth noting however, that the calculations undertaken to estimate the water demand are conservative, utilising higher factors than realistically anticipated for items such as peaking factor, number of personnel and water usage per person. The details of water demand would be refined at detailed design once a contractor has been appointed and the construction works and programme refined. Anglian Water have not stated that they will not be able to supply greater than 20m^3/day but have indicated that the WRA is required so they can *"better understand water demands, water efficiency measures and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth."*. Should water demand from Anglian Water assets exceed 20m^3/day and Anglian Water indicate that they cannot fulfil the demand, then options to supply water by other means such as tankering in externally from other suppliers (with the necessary permits) would be explored. The Applicant does not envisage water supply as impacting on the timeframes for delivery. Anglian Water's protective limit of 20m3/day on water usage and the requirement to provide a WRA for any usage beyond this, ensures that that interactions with the Water Resource Management Plans are considered appropriately. By setting a limit and consideration of mitigation (that would be set out within the WRA) it would be ensured that no water would be provided beyond acceptable limits. With

ExA Q Ref	Respondent	Question Summary	Applicant Response
			this in mind, the approach is considered to be in line with the requirements set out in 5.16 of EN-1.
Q12.0.8	The Applicant	**Water Resources** Page 392 of the Applicant's Responses to Relevant Representations states "If at detailed design, it is confirmed that potable water demand is in excess of 20m3/day then a Water Resource Assessment will be produced prior to detailed design and suggest this is secured through requirement." Please provide an appropriately worded requirement for this matter.	Rather than a standalone requirement it is recommended that the need for a WRA, subject to detailed calculations, is secured through the oCEMP. Refer to Table 3.5 of the oCEMP submitted with Deadline 2.
Q12.0.9	The Applicant	**Water Run-off** Paragraph 7.5.15 of Chapter 7: Hydrology and Hydrogeology states "*Solar farms (i.e. the modules themselves) are not considered to result in significant increases in runoff when compared to the existing greenfield situation. This is on the basis that runoff from the modules themselves will simply drop directly to the ground where the natural regime will be maintained*." What is the evidence that supports this statement being applied to solar farms on the scale of the Proposed Development?	The evidence for the statement is based on research undertaken by Cook L.M. and McCuen R.H (2013, Hydrologic response of Solar Farms. Journal of Hydrologic Engineering 18: pp 536-541). Although this research does not assess a solar farm of the scale proposed, it sets out design suggestions and recommends that with well maintained grass cover, solar development has little impact on runoff rates and volumes. However, it goes on to indicate that sensitivity analysis has been undertaken, particularly with regards to ground cover and concludes that if grass cover is not maintained then there can be significant changes in the hydrologic response. In this case, it is recommended that some form of storm water management is incorporated to counteract the effect and reference is made to buffer strips or detention basins. 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 indicates that where a level of "good

ExA Q Ref	Respondent	Question Summary	Applicant Response
		What evidence is there that demonstrates water run-off would not change as a result of the solar panels covering the area that is proposed, and this would continue through the lifetime of the project taking into account climate change? Would there be increased run-off from solar panels at the edges of the lowest side of the panels? Should monitoring of water run-off take place once the construction phase is completed, with the potential for mitigation to be provided in the event that it was required?	grass cover" is included, runoff volumes increased by 0.35% and runoff rates increased by 0.31%. The proposed species rich grassland proposed are anticipated to provide a greater level of mitigation in terms of runoff that the "good grass cover referred to in the research. In addition to the species rich grassland and proposed maintenance of the grassland, it is also proposed that SuDS features such as filter drains, swales and basins/scraped be incorporated within the solar array areas to encourage infiltration, intercept flows and provide erosion control (as set out within the FRA, submitted at Deadline 2). At detailed design, the location of these features will be assessed further to ensure that they are located in the most critical areas and ensure that any impact on hydrologic response is managed. Although research of solar farms comparable to the scale of the Proposed Development is not available, the measures set out above are anticipated to provide sufficient mitigation to ensure that there would a negligible impact on surface water runoff when compared to the existing situation. Rainfall running off the panels would be more concentrated along the "drip edge" and research suggests this can result in increased erosion of bare soil. As set out above, it is proposed that species rich grassland will be provided beneath the panels, which will be subject to maintenance to ensure sufficient ground cover is maintained. The inclusion of this grassland will minimise the potential for erosion to occur along the "drip edge" and the inclusion of strategic SuDS features such as filter drains, swales and basins/scrapes will provide further mitigation in reducing velocities of runoff. Rainfall intensity is estimated to increase as result of climate change however, this will increase irrespective of whether the proposed development is implemented or not. Any change in runoff rate or volume as a result of increased rainfall intensity is therefore expected to be linear when compared to the existing or proposed scenarios. The only exception to this would be that the intensity of runoff from the "drip edge" of the panel could increase however, as set out above,

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			the grassland and SuDS features proposed would minimise the potential impact of this. Monitoring could in theory be undertaken however, to gain any meaningful insight and comparison of the impact on runoff conditions, a consistent rainfall event would need to be applied to both the existing and proposed situations. Based on the variable nature of rainfall events, this would be very unlikely to be mimicked in natural conditions between the existing and proposed scenarios.
Q12.0.10	The Applicant	**Sequential Test** It is noted that details relating to the Sequential Test will be submitted at D2. Table 4.1 within the Site Selection Report – Appendix 1 to the Planning Statement – states that one of the reasons sites were discounted from the site selection process was due to *"the landowners were not willing to put their land forward for the Proposed Development and the Applicant's aim is to secure the land parcels by voluntary agreement where possible"* Within the Applicant's Deadline 1 response to ISH1, is states "*The discussions with landowners within this area didn't prove fruitful, and there weren't any landowners within this part of the Area of Search that wanted to promote a solar farm on their land."*	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. For further information in relation to why the identification of a willing landowner forms part of the site selection process and balance of alternative sites, see paragraphs 5.2.10 - 5.2.15 of the Sequential Test Assessment [EN010159/APP/9.15].

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		NPS-EN1 paragraph 5.8.10 states "*The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site. It would only be appropriate to move onto the Exception Test when the Sequential Test has identified reasonably available, lower risk sites appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified. Examples could include alternative site(s) that are subject to national designations such as landscape, heritage and nature conservation designations, for example Areas of Outstanding Natural Beauty (AONBs), SSSIs and World Heritage Sites (WHS) which would not usually be considered appropriate.*"	

ExA Q Ref	Respondent	Question Summary	Applicant Response
		PPG paragraph 028 states "'*Reasonably available sites' are those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development. These could include a series of smaller sites and/or part of a larger site if these would be capable of accommodating the proposed development. Such lower-risk sites do not need to be owned by the applicant to be considered 'reasonably available'.*" Can the Applicant please explain: why the approach used has been taken; how the approach taken complies with the requirements of NPS-EN1 and the PPG; and why sites have been discounted due to landowners not voluntarily agreeing to their land being included in the scheme. What is the policy basis for deselecting potential sites from the selection process due to the landowners not voluntarily agreeing to their land being included in the scheme.	

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Q12.0.12	The Applicant	**Trent Valley Internal Drainage Board byelaws and assets** In their submission at Deadline 1, the Trent Valley Internal Drainage Board (TVIDB) provide details of byelaws that prohibit work on or near assets without their approval. The submission goes on to state that all watercourse crossings are required to use HDD or similar, at a minimum 2m depth plus the cable safety distance. Any culverting or other works also requires consent from TVIDB. Can the Applicant please confirm: Please explain where within the dDCO these requirements are secured? If changes are required, provide full details of the alterations, explaining the impacts on the FRA and outline Drainage Strategy. If changes are required, what impact does it have on other related assessments e.g. location of HDD crossings in the noise assessment.	The Applicant is currently negotiating protective provisions with the IDB, which sets out the approval process for any specified works on or near IDB assets. Table 3.5 of the oCEMP [REP1-047] includes consideration of the watercourse crossings and sets out that the cable route crossing for the River Trent will be a minimum of 5m below the bed of the river and that for other smaller watercourses, the crossing will be a minimum of 2.5m below the bed of the watercourse. The latter point is relevant to the ordinary watercourses that the IDB are responsible for.
Q12.0.13	The Applicant and MMO	**MMO**	During the second, statutory consultation, the MMO was identified as a prescribed consultee under s42(1)(a) and sent the s42 notice and a copy of the s48 notice as required by EIA regulations on 15 May 2024, and again on 17 June 2024 to announce that the consultation period had been extended. On 20 June, the MMO responded by email to the project inbox to explain that no licence would be needed, provided that any works would be under the Mean High

ExA Q Ref	Respondent	Question Summary	Applicant Response
		AS-005 contains an email trail from 20 June 2024 between the Applicant and the MMO regarding licensing for the cable crossing the River Trent. Within their Deadline 1 submission [REP1-105], the MMO state they were not formally made aware of the One Earth Solar Farm scheme until 17 July 2025, and invite the Applicant to enter into discussions regarding the scheme. Due to the conflicting information that has been received to date, it is unclear to the ExA what the status of discussions between the Applicant and the MMO are. Can both parties please provide: Details on the latest position on the discussions with the MMO, including whether meaningful discussions have begun, and what progress has been made. Please explain the implications for the Proposed Development and whether a Deemed Marine Licence is required? Evidence on the likelihood that this issue will be resolved by the end of the Examination.	Water Mark. The Applicant asked if this would be deemed to be breached if the works included a horizontal directional drill (HDD) under the River Trent and the MMO advised that it would not. Therefore, no further consultation was deemed to be necessary. On 17 July 2025 the Applicant sent s56 notices to all statutory consultees, which included the MMO. 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 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.

ExA Q Ref	Respondent	Question Summary	Applicant Response
			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 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*

ExA Q Ref	Respondent	Question Summary	Applicant Response
			Deemed Marine 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) 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

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			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 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. The Applicant does therefore not consider that there is a live issue with the MMO that requires further discussion.
Land use and soils			
Q13.0.1	The Applicant	**BMV** The Written Ministerial Statement (WMS) dated 15 May 2024 entitled 'Solar and Protecting our Food Security and Best and Most Versatile Land' on the use of the	The weight to be attached to the WMS referenced has been considered in the Planning Statement [APP-068] and in numerous solar NSIP decisions, one of the most recent ones being West Burton Solar Farm which was made in January 2025, in which the WMS 2024 is referred to as having "*emphasised certain aspects of the policy in the 2024 NPSs*" (West Burton para 4.227 – a description

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		Best and Most Versatile Agricultural land (BMV). Could the Applicant provide an explanation as to how the WMS has been used to guide and minimise the use of BMV in line with National Policy. In light of the WMS can the Applicant provide a table showing a breakdown of the quantity and type of BMV within the Order Limits.	that is adopted in many decisions for made solar DCOs) and the decisions are clear that the WMS 2024 does not introduce new policy over and above that contained in the NPSs. In summary, it is clear that the 2024 WMS reflects policy in NPS EN1 and NPS EN3 which is that: • applicants should not site their scheme on BMV agricultural land without justification; • applicants should demonstrate that they have prioritised the use of previously developed, contaminated and industrial land and lower grade land first; and • where schemes are located on BMV agricultural land, the Secretary of State should take into account the economic and other benefits of the land. The Proposed Development has done this as set out in the Site Selection Report (Appendix 1 of Planning Statement [APP-168] paragraphs 3.3.4 to 3.3.11) and the Design Approach Document [APP-171] at page 64 which explains how the siting within the Order Limits has sought to reduce use of BMV land. This explains that 84 acres (34 ha) of BMV agricultural land was removed before the Statutory Consultation and a further 161 acres (65 ha) before submission – 99ha in total. The Secretary of State's decision on West Burton Solar Farm confirmed the following: "4.265 - *The Secretary of State has considered all relevant policy within the 2011 and 2024 NPSs relating to solar and land use as important and relevant considerations within the decision-making process, including paragraph 5.11.34 of 2024 EN-1 which states that the Secretary of State must ensure that applicants do not site their scheme on BMV land without justification, and, where schemes are to be sited on BMV land, the Secretary of State should take into account the economic and other benefits of the land. The Secretary of State recognises that the 15 May 2024 WMS4 is an important and relevant consideration and it emphasises elements of the 2024 NPSs.*"

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			"*4.267. The Secretary of State agrees with the ExA that the Applicant has demonstrated they have sought to minimise the impact as far as possible with the amount of BMV land required for the totality of the Proposed Development at 26.24%, and the Stow Park Alteration reduces the BMV further to 23.51%. The Secretary of State notes the land could be returned to arable farming after 60 years and that the oSMP provides a commitment to restoration of the land. The Secretary of State acknowledges, for the Stow Park Alteration, the fixed term, reversible loss of approximately 627ha of agricultural land, and 147.58ha of BMV land, for 60 years but considers that the use of agricultural land is necessary. The Secretary of State notes the Applicants calculations (without the Stow Park Alteration) that the 769ha of agricultural land required for the Proposed Development would be 0.16% of the 494,085ha of agricultural land in Lincolnshire and that the Stow Park Alteration would reduce the impact further.*" The Proposed development would result in the use of 0.03% of BMV land within Lincolnshire and 0.5% of BMV land within Nottinghamshire. When all reasonably foreseeable projects are added, these figures increase to 0.29% and 0.64% respectively. In the context of the Secretary of State's decision on West Burton Solar Farm, these figures are still very small (less than 1%). It would therefore be reasonable for the ExA to draw the same conclusion as the Secretary of State that the impact is small when considered against the total agricultural land available for food production in Lincolnshire and Nottinghamshire. The results of the ALC survey are provided within ES Chapter 8: Land and Soils (APP-037) and the full survey is provided in Appendix 8.3 Agricultural Land Classification Survey Report (APP-105). A table showing a breakdown of the quantity and type of BMV within the Order Limits is provided below: **ALC Grade** / **Area (ha.)** Grade 1 / None Grade 2 / 244.8 Grade 3a / 416.1 Grade 3b / 579.5

ExA Q Ref	Respondent	Question Summary	Applicant Response
			<table><tr><td>Grade 4</td><td>None</td></tr><tr><td>Grade 5</td><td>None</td></tr></table>
Q13.0.2	The Applicant (1)	**BMV** NPS EN-1 at paragraph 5.11.34 states that *"The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land."* (1) Please explain how the economic and other benefits of the BMV has been assessed.	The guidance followed when considering the impacts on soils in the Environmental Statement (ES) is the Institute of Environmental Management & Assessment (IEMA) Guide: A New Perspective on Land and Soil in Environmental Impact Assessment, 2022. This was developed to consider the multiple ecosystem service benefits that are delivered by soils and the contribution these services make towards economic activity, social objects and human well-being. Therefore, the assessment of BMV within the ES has an in-built consideration for both economic and other benefits. The landowners will receive payments for supplying land for the development and their decision to agree a contract will be based on their judgement of reduced operational costs, increased income and much reduced risks of fluctuating performance of their business. Thus there would be improved financial income and security with which to support the long term investment in their business. The Applicant has also addressed this point in part in response to ExA Action 51 from ISH1, as recorded in a post hearing note in the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1, pages 72 – 75.
Q13.0.3	The Applicant	**Environmental Stewardship schemes?** (1) Is any land within the Order Limits included within an Environmental Stewardship scheme? (2) if so how much is there, and (3) at what stage of the ESS is it and how has the assessment of BNG taken this into consideration?	There is 24.2 hectares within the Environmental Stewardship Scheme. The agreement is due to end on 31st December 2027. There is 329.79 hectares within the Countryside Stewardship Scheme. The agreements are due to end as below. <table><tr><th>Area (hectares)</th><th>Agreement end date</th></tr><tr><td>22</td><td>01/08/2027</td></tr><tr><td>29</td><td>15/02/2027</td></tr><tr><td>3</td><td>01/01/2027</td></tr><tr><td>45</td><td>01/09/2026</td></tr></table>

ExA Q Ref	Respondent	Question Summary	Applicant Response
			<table><tr><td>54.07</td><td>31/12/2025</td></tr><tr><td>113.79</td><td>30/04/2027</td></tr><tr><td>62.93</td><td>31/12/2026</td></tr></table>
Q13.0.4	The Applicant, the Councils, Natural England	**Soil Health** The depth of cables was discussed during the Hearings of the week commencing 7 July 2025, and there appeared to be some disagreement as to what a suitable depth should be to ensure ploughing could take place post development in the event cables were left in situ. (1) Please provide evidence of the depth of ploughing that has occurred across the land within the Order Limits. (2) In order to ensure ploughing would be possible post development in the event cables were to remain – what would the minimum depth require to be to facilitate this, (Is there a recognised best standard or advice note for the soil type across the Order Limits?) (3) How Is this secured?	As agreed by Natural England (response dated 7th August) recorded in the Draft Statement of Common Ground being submitted at Deadline 2 [EN010159/APP/8.10], the main requirement would be that cables are installed deep enough to avoid any potential impact on standard agricultural practices. Therefore, allowance needs to be made for maximum cultivation depths that may occur on agricultural land. Normal annual topsoil cultivations may vary from 10 cm to 30 cm, and this is evidenced by the development of a distinct colour boundary between topsoils and subsoils. However, less frequent but still commonplace operations are deeper cultivations and land drainage measures, such as: • subsoiling (up to 45 cm below ground level – applies to all soil types without shallow stone/rock) • mole ploughing (up to 65 cm deep – applies to heavy clay soils) or • installing land drains (typically 0.6 to 1.0 m deep, but in certain soils can be far deeper – applies to slowly permeable soils or those susceptible to fluctuating groundwater). All these are standard agricultural operations. The contractor would be instructed to construct cable ducts in accordance with industry standard best practice guidance where appropriate. The Outline Decommissioning Environmental Management Plan [REP1-051] states the maximum depth at which cables will left in place (below 0.9m) "b*uried interconnecting cables (medium voltage) would either be removed or left in-situ providing the depth of installation was below 0.9 m and would not interfere with normal agricultural operations (ploughing or subsoiling, typ. To a max of 450mm)"*. This plan will reviewed and against best practice at the time of decommissioning and agreed with the Local Planning Authorities,

ExA Q Ref	Respondent	Question Summary	Applicant Response
Q13.0.5	The Applicant	**Soil Health and decommissioning** It is understood that the DCO is intended to be time limited to 60 years. What design approach has been undertaken in order to assist in ensuring that if it were regarded as the most suitable approach to remove cables and below ground works at the end of the period, that the effective removal had been planned for to minimise harm to soil health? It is understood that there is proposed to be a decommissioning plan, would it be appropriate that this include a method of design considered at the outset that ensured removal was facilitated? Please set out how mitigation is secured if appropriate to deal with any potential harms to soils from the construction, operation and decommissioning periods, but also in dealing with the eventuality that cables are left in situ.	It has been agreed with Natural England that leaving cables in the ground (provided suitably deep to allow regular farming activities to take place, below 0.9m) is an acceptable position, and that removal presents a larger environmental impact from a soils perspective. In general the Solar PV Site will be reinstated in accordance with the Outline Decommissioning Environmental Management Plan (oDEMP) [APP178]. As detailed in the oDEMP [APP-178], cables left in situ after decommissioning would not impact the future agricultural use of the land, provided they were buried at a minimum 0.9m depth. Cables buried at least 0.9m below ground are expected to be left in place, and that approach is based on the Applicant's understanding (informed by use of cabling elsewhere and the approach taken on other similar schemes) that these cables would be unlikely to be considered as waste if left in the ground. The approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. However, recognising that industry practice and legislation may change by the time of decommissioning, the Applicant has made clear in the oDEMP that the approach will be confirmed at the time of decommissioning, based on government policy and best practice. Paragraph 1.1.6 of the oDEMP provides: "*The mode of cable decommissioning for the grid connection and other underground cables will be dependent upon government policy and best practice at that time. Currently, the most environmentally acceptable option is leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening the ground at regular intervals and pulling the cable through to the extraction point, avoiding the need to open cut the entire length of the cable route*."

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			This current approach minimises soil disturbance by avoiding unnecessary handling, plus reduces potential impacts on nearby residential and ecological receptors, and avoids unnecessary disruption to established hedgerows and biodiversity habitats created by the Proposed Development. The DEMP will need to be approved by the relevant planning authority pursuant to requirement 20 of the draft DCO, and the relevant planning authority would need to consult with both the Environment Agency and Natural England as part of the approval of the DEMP, meaning that there is the mechanism in place to ensure the EA has the opportunity to input to the approach at the time of decommissioning (which is a position that we understand the EA has been comfortable on for other similar solar schemes). Based on current available information, the Applicant does not believe there is a way to further mitigate the potential impact on soil health and biodiversity through the removal of all cables, in addition to the methodology referenced above to avoid open cut of the length of the cable route.
Human Health			
Q14.0.1	The Applicant	**Mitigation of adverse human health effects**	Within the Design Approach Document [EN010159/APP/5.8] (DAD), changes to the scheme based on feedback received were considered under the design principle 'Protect features that are valuable to the local community'. Those changes are itemised in tables 2,3,4 and 6. Furthermore, pages 48-57 outline the design evolution around local villages and residential properties. The Outline Design Parameters [EN010159/APP/5.9] was also drafted to reflect the same design principle 'Protect features that are valuable to the local community'. For example, for Work Number 2, pages 7-9, outlines how the BESS equipment will be located at a distance of at least 300m from residential properties and will be designed to ensure a night time noise rating level at residential receptors of no greater than 35dB(A). This location was designed following feedback from the community around noise concerns from the Proposed Development.

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		Paragraph 16.5.5 of ES Chapter 16 states "*These measures affect all phases of the Proposed Development. As a consequence, the participatory approach has resulted in various embedded mitigation and enhancement areas being proposed and contributing towards mitigation of adverse mental health effects. These are set out in the Design Approach Document [EN010159/APP/5.8] (DAD) and the Outline Design Parameters [EN010159/APP/5.9] and will be secured via DCO requirement*." (1) Can the Applicant please confirm where in the Design Approach Document and in the Outline Design Parameters it is stated that the changes to the scheme that were made following feedback received, were done so to mitigate adverse effects on mental health? Can the Applicant also provide the evidence that demonstrate the changes made will mitigate adverse effects on mental health?	As outlined by IEMA, early and meaningful engagement activities can be considered primary mitigation as they improve community understanding of the project and practitioner understanding of the community. In line with best practice, where a human health impact is identified within the Human Health ES chapter, mitigation measures are recommended to mitigate against a negative impact. The Applicant acknowledges that all development has the potential for adverse effects for some particular individuals. Mitigations proposed following feedback received will reduce adverse effects on mental health by providing a sense of control, inclusion and participation.
Q14.0.2	The Applicant	**Impact on human health** Several RRs refer to the scheme having a detrimental impact on the mental health and wellbeing of local residents.	Several RRs refer to the adverse mental health impacts arising from the Scheme in a generalised manner. Where specific comments have arisen, targeted mitigation measures have been provided. Examples of this can be found in the Design Approach Document [AS-013]

ExA Q Ref	Respondent	Question Summary	Applicant Response
		How has this impact been considered and if appropriate mitigated against? Whilst mental health is mentioned in Chapter 16, it is omitted from Table 16.11., please clarify the situation	Both physical and mental health effects are considered across the construction, operational and maintenance, and decommissioning phases of the Proposed Development. Mental health is omitted from Table 16.11 as it is not considered to be a wider determinant of health. Wider determinants of health relate to the biological, behavioural, socio-economic, cultural or environmental factors which contribute to the health status of individuals or populations, including their mental health. Impacts on mental health are considered in the assessment of four wider determinants of health: Physical activity; Community identity, culture, resilience and influence; Climate change mitigation and adaption and Electro-magnetic fields. Environmental design measures have been embedded into the Proposed Development to address concerns relating to mental health, including: having a named point community liaison officer; planting of new vegetation; offsets and the removal of land between North Clifton and South Clifton.
Q14.0.3	The Applicant	**Impact on human health** [RR -132] refers to a study, which states "*Studies have shown the psychological benefits, especially on mental health, of being surrounded by the sights and sounds of plants and nature - this will all change if the proposed site goes ahead."* How has the assessment of the proposed development addressed the changes that would arise to access to the sites and sounds of nature been considered as part of the assessment of effects on the health of residents?	The Biodiversity chapter assesses the impacts of the Proposed Development in relation to impacts on birds. The assessment indicated that impacts on skylarks and wintering birds would be not significant, and the impacts on other breeding birds to be significant beneficial. Measures including avoiding the majority of nesting habitat for farmland birds (e.g. hedgerows) and being created outside of the solar arrays. It should also be noted that there are other arable fields within the vicinity for wildlife to thrive. Furthermore, the Applicant calculates a significant Biodiversity Net Gain and has proposed a number of enhancements to the benefit of biodiversity across the development. Mitigation measures have also been put in place to avoid some of the visual impacts associated with the Proposed Development. These include setbacks to the south of Ragnall Village and offsets of up to 50 metres from Main Street; Land between North Clifton and South Clifton removed from the Proposed Development to maintain perceived connectivity between the villages; Bespoke

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			buffers and setbacks to individual properties based on the home visits and consultation responses and Solar panels offset by at least 15 metres and up to 180 metres from PRoWs. In addition, the Applicant is increasing access through the addition of Permissive Paths across the development. In summary, while the Applicant accepts that the development will create some visual impact this has been mitigate through offsets and screening. Biodiversity and nature will be enhanced through this development and greater access to this enhanced biodiversity is being propose through permissive paths.
Q14.0.6	The Applicant	**Human Health** With reference to paragraph 4.4.6 of NPS EN-1, please could the Applicant summarise the consideration given to promoting local improvements to encourage health and wellbeing, including potential impacts on vulnerable groups within society and impacts on those with protected characteristics under the Equality Act 2010, i.e., those groups which may be differentially impacted by a development compared to wider society as a whole?	Vulnerable groups who may be more disadvantaged by development are identified within the Human Health assessment. Groups identified include older people, those with poor physical or mental health and unemployed people. Local improvements to promote health and wellbeing as part of this Proposed Development include a series of permissive paths that will be open for the operational phase of the Proposed Development to be used by equestrians, cyclists and pedestrians
Landscape and visual			
Q15.0.1	The Applicant	**Horlock Rules** (1) The DAD refers to these rules informing the design and siting of substations. Please ensure a copy of the Rules is submitted into the Examination.	The Applicant will submit a copy of the Horlock Rules into the Examination for Deadline 2. The Applicant will also ensure that the typographical errors are amended in the Design Approach Document to be submitted at Deadline 2.

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		(2) Please check Table 5 of the DAD – Response to Horlock Rules – there appears to be some typographical errors. E.g. box 3 of design response the word 'including' is repeated, box 4 – should this be new planting rather than planning?	
Q15.0.2	The Applicant Natural England The Councils	**National Landscapes** Do the Councils and NE agree there is no effect on the setting of national landscapes and that the duty under s245 of the Levelling Up and Regeneration Act 2023 (LURA) do not apply?	There are no national landscapes within the Order Limits or the LVIA Study Area. The nearest national landscape is the Lincolnshire Wolds located over 30km to the east. The Applicant is therefore of the view that there will be no effect on the setting of national landscapes and that the duty under S245 of the Levelling Up and Regeneration Act 2023 does not apply.
Q15.0.3	The Applicant, The Councils	**Veteran Trees** At ISH1 the Applicant indicated that there were no veteran trees within the Order Limits. This has now been confirmed not to be correct in the D1 submissions. In light of the fact 13 veteran trees are present within the Order Limits, should the DCO and or supporting mitigation document be worded to afford additional protection for such trees, by way for example of requiring no construction activity within root protection zones and/or for consultation to be undertaken with the LPAs prior to undertaking any work when this might be deemed necessary.	All veteran trees identified in Appendix 11.6 Arboricultural report [APP-134] and as presented in Figure 6-1B [REP-1-028] will be retained. The Applicant has updated the Outline Design Parameters [RE1-021] and OLEMP [REP1-053] at Deadline 1 to secure appropriate protection of veteran trees. This includes a commitment to undertaking no works within the Root Protection Areas of veteran trees, as well as commitments to considering tree works in accordance with BS 5837:2012 and BS 3998:2010.

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Q15.0.4	The Applicant	**BESS Locations** Having undertaken two USI, it is apparent that both BESS locations are in positions that will allow them to be easily seen from both the local highway and PROW network. Please explain in further detail, the justification for these locations, and the proposed mitigation that it is intended would ensure that adverse effects are reduced to an acceptable level. The NPS policy test NPS EN-1 paragraph 5.10.6 *"Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate."* Please explain how the approach would achieve the minimum harm to the landscape, and or provide further explanation and justification for the mitigation proposed.	The BESS has 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 location of the BESS has also been refined throughout the design process with regard to Agricultural Land Classification, areas at risk of flooding, and constructability. Besides from siting the BESS away from sensitive features and areas, other ways the adverse effects of the BESS will be reduced to an acceptable level is by providing soil storage in the form of bunds measuring up to 3m around the BESS compounds, using a muted colour palette that will be sympathetic to the surrounding area, planting woodland and native tree belts to provide screening in sensitive areas, and 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 Design Approach Document [AS-013] provides further information on how the Proposed Development including the design of BESS compound has sought to minimise harm to the landscape.
Q15.0.5	Applicant	**Location of BESS** In light of the concerns of the locations identified by West Lyndsey DC in their WR at D1 with regard to the locations of the BESS, please set out a detailed response. In doing so please advise whether the revised location indicated in the WR as a preferred option in 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, areas at risk of flooding, and constructability. The Applicant understands that WLDC has questioned if the eastern BESS could be positioned further east from its currently proposed location. However, the

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		terms would be any better, worse or neutral with regard to other environmental criterion such as flooding, noise etc.	current location of the eastern BESS is located the furthest east of the A1133 without being in areas at risk of flooding. 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. 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. The opaque fences situated alongside the solar development will be a short-term solution and will be removed once positive management of the existing hedgerow allows for adequate screening.
Q15.0.6	The Applicant	**Landscape effects at night/ light pollution**	The Applicant has considered the impacts of lighting on landscape and visual receptors in combination with the wider construction, operation and decommissioning impacts. This is evident within the detailed landscape and visual assessments provided at Appendix 11.3 [AS-044] and Appendix 11.4 [AS-046]

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		The Proposed Development is largely in a rural landscape where light sources appear to be limited, please explain what assessment has been undertaken in respect of potential light pollution, during construction, operation and subsequent decommissioning. What controls are in place to ensure that effects of light during the respective periods are managed, and that adverse effects are mitigated? Can you confirm that lighting would only be installed at the BESS for the operational period?	respectively, which refers to lighting associated with each phase of the Proposed Development where relevant. The assumptions with regard to lighting on which the LVIA is based upon and are consistent with the control measures secured within the following documents: - Outline Construction Environmental Management Plan [REP1-047] - Outline Operational Environmental Management Plan [REP1-049] - Outline Decommissioning Environmental Management Plan [REP1-051] The Applicant can confirm that Passive Infra-Red (PIR) controlled security lighting will be installed at each corner of the substation compounds for the duration of the operational period. There will also be internal lighting within the Power Conversion Systems and substation control buildings that will be manually activated when needed. Elsewhere, only mobile task-specific lighting will be used in the event of an emergency requiring night-time working or panel cleaning operations.
Noise and vibration			
Q16.0.1	The Applicant	**Potential noise impact from piling** Whilst it is acknowledged that the final number of solar panels/frames that will form the proposed development has not yet been finalised, it would aid the ExA if details were provided shown on plans, of any relevant scenarios that are being considered. What does the DCO secure to ensure piling activities would not cause harm ?	Control of noise from piling activities would be considered within the CEMP(s). The assessment of potential noise impacts due to piling activities summarised in Chapter 15 of the ES [APP-044] and detailed in Appendix 15.3 of the ES [APP-141] assumes, as a worst case, that piling would take place at the minimum distance between potential solar panel locations (i.e. Works Area 1 in the Works Plan [APP-012]) and sensitive receptors. In the assessment carried out in the ES, it has also been assumed that percussive piling would be used, which is the worst-case option for piling methods in terms of both noise and vibration. Further information on the actual methodologies to be used and precise pile locations will be available when the CEMP(s) are produced and submitted for approval to the LPAs under Requirement 13 of the draft DCO [APP-007]. As such, it will be possible to include more detail than is currently available on the precise noise and vibration mitigation measures that will be required during piling when

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			the CEMP(s) are produced. The CEMP(s) are therefore considered to be the best means of controlling both noise and vibration from piling at sensitive receptors during piling activities.
Q16.0.2	The Applicant	**Noise and vibration effects** Paragraphs 15.6.5 (noise) and 15.6.6 (vibration) of Chapter 15: Noise and Vibration both state that there will not be any significant effects of noise and vibration during construction due to construction activities taking place near receptors only lasting a short time. oCEMP relies on BPM – are the LPAs satisfied this would be appropriate – and also whether they agree with the refence to stakeholders or should the Councils be specified as bodies required to be worked with? **"***agreed with appropriate stakeholders following appointment of a principal contractor and prior to commencement of construction work"* are councils content that the oCEMP provides adequate mitigation and management measures to enable construction to take place whilst keeping noise and vibration levels to a satisfactory level?	This question appears to be for the LPAs rather than the Applicant; however the Applicant feels that the CEMP(s) would be the best way of controlling with construction noise and vibration. The CEMP(s) can take account of the details of construction that are not currently known but will be available when the CEMP(s) is/are submitted for approval under Requirement 13 of the draft DCO [APP-007]. The oCEMP [APP-176] sets out the general principles that will be followed when producing the CEMP(s). As discussed in the response to Q16.0.1, it will be possible to include more detail in the CEMP(s) on the precise noise and vibration mitigation measures that will be required than is currently available for inclusion in the oCEMP.

ExA Q Ref	Respondent	Question Summary	Applicant Response
Socio-economic effects			
Q17.0.1	The Applicant	**Tourism** The Applicant's response at Deadline 1 to the question regarding a 2013 study of the "Impact of Renewable Energy Farms on Visitors to Cornwall" is noted. Please provide the evidence that demonstrates this study is relevant as a guide for the impacts on tourism that could be caused by the One Earth Solar Farm proposal. How relevant is the comparison of tourism in Cornwall with tourism in Nottinghamshire and Lincolnshire? How many of the solar farms in the study are of a similar scale to the Proposed Development? How many solar farms in the study are located a similar distance from the Proposed Development as the other solar farms in the Nottinghamshire and Lincolnshire area?	The 2013 Cornwall Study is deemed a suitable and valuable benchmark for assessing potential impacts on tourism that could be caused by the Proposed Development. Conducted in a tourism-reliant region, it provides robust empirical insights into how visitors perceive renewable energy developments. It serves as a cautionary benchmark highlighting visual impact, community expectations, and tourism sensitivity. While it should be acknowledged that the study took place in a different geographic context to the Proposed Development, the study addressed general attitudes from visitors toward renewable energy, which can be transferred to other regions. In terms of the relevance in comparing tourism in Cornwall with tourism in Nottinghamshire and Lincolnshire, data from the Great Britain Tourism Survey indicates that the South West of England received 5.2 million overnight trips taken by British residents in Q3 2023. This is in comparison to 2.2 million overnight trips taken in the East Midlands region in Q3 2023. Although Cornwall differs geographically and contextually from Nottinghamshire and Lincolnshire, the foundational themes of visitor awareness, environmental concern, and perceived visual impact are universally applicable. The study's categorisation of impacts—particularly around visual effects, public perception, and environmental attitudes—can meaningfully inform assessments of the proposed development, even in a different region. In regard to the number of solar farms identified as being of a similar scale to the Proposed Development in proximity, Figure 2 within the Joint Interrelationship Report [EN010159/APP/9.1] identifies seven separate Solar DCO projects in wider proximity to the Proposed Development. In regard to the number of solar farms that are proposed in proximity to the Proposed Development, the Socio-economics assessment defined the study area to assess the impacts of tourism as the Local Area, which is an area comprising

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			four Lower-Layer Super Output Areas (LSOA) that the Order Limits intersects. Illustrated in Figure 17.1 (ES Volume 3: Figures Supporting Volumes 1 and 2 [EN010159/APP/6.20]. There are no other solar developments located within the combined LSOA areas. Within a 2km ZoI from the Proposed Development there are no solar developments.
Q17.0.2	The Applicant	**Tourism** Please provide the evidence that enabled the conclusion in paragraph 17.6.13 to be reached, that the One Earth Solar Farm is not likely to be a deterrent to tourists upon completion. For clarity, please also provide the evidence and conclusion for the cumulative effects on tourism of all solar projects in the Nottinghamshire and Lincolnshire area.	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 the assessment is subjective to an extent, 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. From a landscape perspective, the Proposed Development will be one of potentially three solar farms within or partially within a 5km study area. Intervisibility between the schemes is likely to be limited, with views in combination typically dominated by the closest development. Due to the low lying nature of the landform, no elevated views of the solar farms will be visible. Cumulatively, the provision of landscape and ecological mitigation through elements such as hedgerow planting, will result in only localised impacts rather than an in-combination effect. Therefore, the combination of potential solar farms in proximity to one another is unlikely to become a key characteristic of the landscape and so will not impact upon visitor numbers or the visitor economy of the wider area. As part of the design approach and therefore the illustrative masterplan, no land adjacent to the Fledborough Viaduct was proposed to be occupied by solar infrastructure, in order to protect views from the local high point. It should also be noted that Viewpoint 2a identified as part of the Landscape and Visual assessment extends to Lincoln Cathedral in winter and summer months. As a

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			result of embedded environmental mitigation measures, only minor (not significant) effects are experienced from the viewpoint as a result of the Proposed Development, demonstrating that views of Lincoln Cathedral, which is a key tourist attraction in the wider region, are not impacted. Further commentary upon Lincoln Cathedral can be found within the Written Summary of Applicant's Oral Submission at the Issue Specific Hearing 1 (ISH1) [EN010159/APP/9.5]. In regard to potential impacts from cumulative noise effects (during construction) it should be noted that the closest solar farm developments are not located within the ZoI for noise and vibration. There is therefore no potential for significant effects. It is unlikely that there may be cumulative noise effects during operation due to the distance from the nearest extent of the operational noise study area. This assessment indicates that there is expected to be no noise and vibration impacts to upon tourism receptors in combination with other solar schemes. In regard to the availability of accommodation, further data from Visit Britian indicates some existing hotel capacity to accommodate additional demand. Data for the West Midlands region indicated average room occupancy of 72% in 2023; 77% in 2024 and 76% in 2025. These data suggests 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). Therefore, the potential effect upon demand for these facilities is not significant. The temporary two-year construction period would limit the scale of any potential effects.
Q17.0.3	The Applicant (1) The Councils (2)	**Employment and skills** Within their LIR, BDC refer to their expectations on employment during the construction and operation of the Proposed Development. Can the	The Applicant will has developed an Outline Skills, Supply Chain and Employment Plan [APP-180] which lays out how the Applicant will approach and draw maximum benefits for the employment and skills opportunities brought forward by this development.

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		Applicant please provide a response to the issues raised, including whether the measures outlined by BDC should be incorporated into the application documentation. Can the Councils please confirm whether they are satisfied with the measures proposed, or are there more requirements needed?	The Applicant has reviewed the feedback from BDC and subsequently met with them (20th August 2025) to discuss the ongoing approach to employment and sills. The Applicant is pleased to continue to engage with Local Authorities around employment and skills and will attend and collaborate through the proposed working group as we lay out in the Outline Skills, Supply Chain and Employment Plan [APP-180]. The Applicant recognises the benefits of the Considerate Construction Scheme and supports its aims. As such, the Applicant commits to registering with the Considerate Constructors Scheme, or other similarly aimed schemes to provide positive contributions to the community and environment. This will be added to Outline Skills, Supply Chain and Employment Plan for Deadline 2. The Applicant is committed to embedding workforce development into project development and will consider adopting the CITB National Skills Academy for Construction Client-Based Approach or similarly aimed scheme.
Transportation and traffic			
Q18.0.1	The Applicant	**National Highways RR** National Highways has raised a number of issues in their RR [RR-078] and subsequent WR [REP1-001 - REP1-085]. Can the Applicant please provide the following information: An hourly breakdown of construction staff two-way trips on the SRN. The number of workers anticipated during the construction phase, arrival and departure times, and assumptions for the capacity and occupancy rates for the proposed minibus service.	The Applicant is engaging on the Strategic Road Network matters with the relevant National Highways officer. The expected traffic at the junction of the A1 / A57 is illustrated in the Table provided in Appendix D of the Transport Assessment [EN010159/APP/6.21]. 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 hours.

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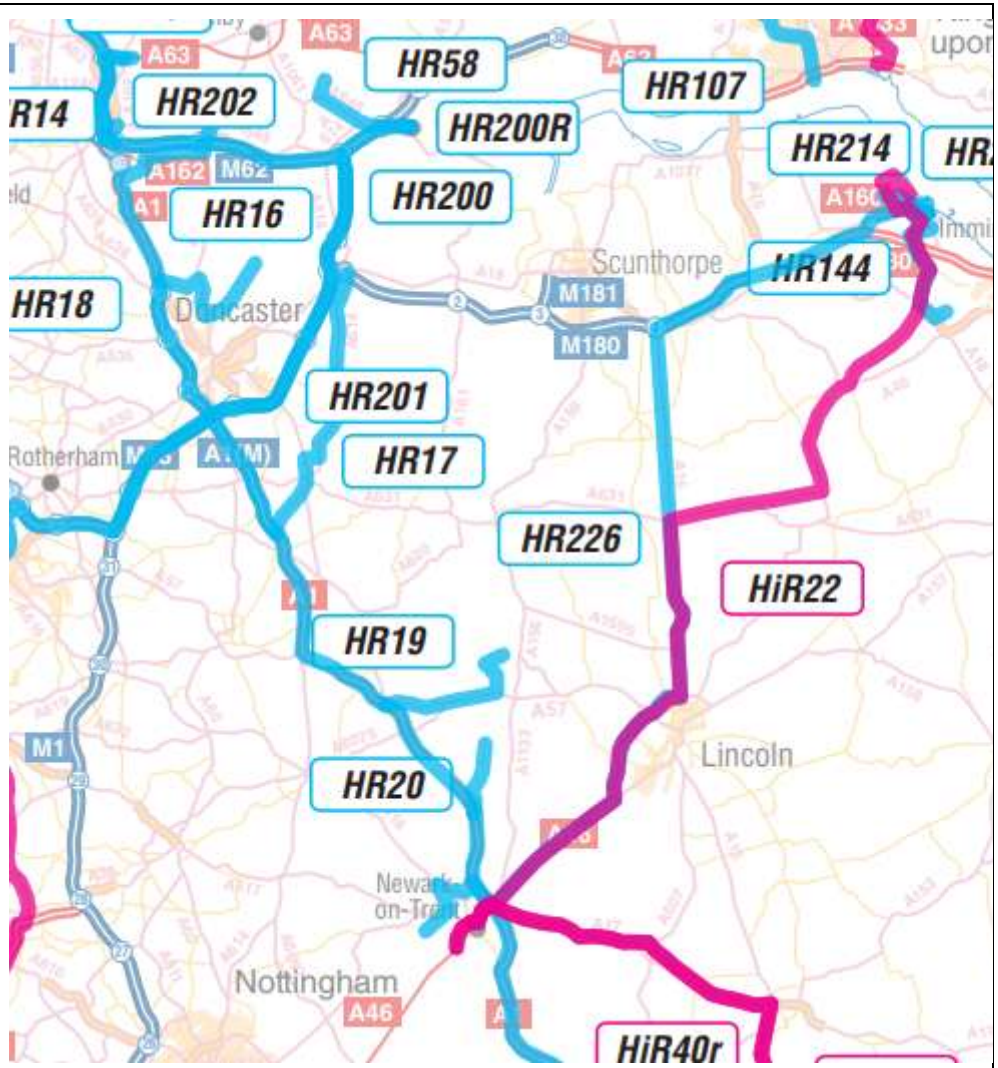
		Hourly two-way trips for HGVs on the SRN, including: • A1/A57 junction; and • A1/A46 junction. Detailed evidence on AIL routes on the SRN.	No HGV traffic is predicted to depart the A1 at the A1 / A47 junction. Department for Transport (DfT) data for the A1 in 2023, suggests that the road accommodates 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. Appendix A of the Transport Assessment provides a detailed review of the access routes for AIL traffic, including the SRN. The National Highways High and Heavy Load Map (https://nationalhighways.co.uk/media/rd1lxmfj/high-and-heavy-load-grids-map-for-abnormal-loads.pdf) indicates that the SRN routes proposed are all recognised routes for AIL traffic (extract below).

			 A63 HR58 HR107 HR202 HR200R HR214 HR16 HR200 HR18 Scunthorpe HR144 M181 M180 HR201 HR17 HR226 HiR22 HR19 Lincoln M1 HR20 Nottingham A46 HiR40r

ExA Q Ref	Respondent	Question Summary	Applicant Response
Q18.0.3	The Applicant	**Trip generation for construction traffic** The TA gives maximum trip rates as a daily rate. More detail is required. For all traffic assessments carried out, provide peak hours assessment not daily.	Peak hour traffic flows are not generally required for renewable projects of this type. The Aplicant would be grateful if the ExA could advise what particular information is requested (traditional network peak or development peak) and what they would like to use the information for so that the information request can be processed appropriately. The IEMA guidelines "The Environmental Assessment of Traffic and Movement" effect criteria are generally set for daily traffic impact reviews rather than hourly flows. The Applicant can provide a percentage impact review for set peak hours, but a full EIA assessment for peak hours may not be fully possible. Hourly flows can be developed, however this will take time to estimate and extract hourly traffic from the traffic surveys. This information can be provided at Deadline 3.
Q18.0.4	The Applicant	**Construction staff travel plan** The Applicant's response to RR-032 on socio-economics, submitted at Deadline 1, states: *"potential cumulative increases in accommodation demand from temporary construction workers and the resulting potential shortage of accommodation for others. "* It is stated that 80% of construction staff will arrive by minibus and will be 'local'. How will the Applicant ensure that staff working on the construction phase will be 'local'? Will local staff require accommodation, that will potentially have a negative impact on the availability of accommodation for	The provision of accommodation staff will be a matter for the contractor(s) appointed to construct the Proposed Development. They will be required to follow the principles set out in the oCTMP with regards to the mode of travel to arrive and depart the site. Unlike other types of development, a construction Staff Travel Plan will not only be controlled by the oCTMP and monitored by the Applicant, it will also be a contractual obligation and contractors will be made aware of this prior to tendering. They will have to demonstrate their proposals during the procurement process and how they will accord to the oCTMP. As a contractual obligation, the observance of the mode splits becomes an absolute requirement. This will be further bolstered by monitoring on site at staff booking in times (required under health and safety guidelines) and by the restricted parking availability on the site. In addition, the location of the Proposed Development is helpful in that there are no large temporary residential facilities immediately adjacent to the site and no

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		tourists, as stated in the socio-economics chapter? What evidence exists to substantiate the 80% target is achievable? Other schemes are referred to but no detail is given as to what schemes they are, whether they are located in a similar location to the Proposed Development, or where the local staff will travel from.	areas where ad hoc car parking can take place. In this regard, the use of a Staff Travel Plan becomes part self-enforcing, helping ensure that the proposed mode splits are observed. In regard to whether there will be impacts to local accommodation availability, the Applicant has provided further information on this in response to Q17.0.2. The 80% target is based upon practical experience of wind farm projects in Scotland, where residential facilities are not located immediately adjacent to the development site. Again, unlike conventional travel plans for residential and commercial developments, the ability to push for more sustainable access from targets at 60% - 70% by staff bus is possible due to the ability to make staff travel a contractual requirement. The Proposed Development is focussed on providing sustainable, clean energy and to reduce carbon emissions. This requires additional commitments during construction to ensure that the site is constructed as sustainably as possible and a robust and high achieving travel plan fits with these requirements and general sustainable travel policies at a national and local level. In addition to the controls laid out in the previously described management plan we will also be seeking engage the local work force as described in the Outline Skills, Supply Chain and Employment Plan [APP-180]. We will be able to place targets within contracts based on discussions with local authorities.
Q18.0.6	The Applicant	**Sites accesses layout** Please provide appropriate plans showing the layout of the access points to the site, including an RSA1, visibility splays, swept path analysis and gate set back distances.	The Applicant has included all access designs as part of the Streets, Rights of Way and Access Plans **[APP-015]**, these plans contain both the highways general arrangement, visibility splays and vehicle swept path analysis. The set back distances for the accesses utilise 2.4m in line with the Design Manual for Roads and Bridges CD123 Section 3.8.

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			Discussions with NCC have resulted in a request for Road Safety Audits (RSA) to be undertaken at access and crossing points. LCC have not requested any RSA on the junctions in their network. The detailed design requirements for delivering the junctions as noted in the oCTMP will provide combined Stage 1 / 2 RSA as part of the technical approval process for each junction. Stage 1 RSA have been requested for all NCC junctions, and the Applicant is considering this request and will provide these where appropriate or necessary at Deadline 3.
Q18.0.8	The Applicant NCC	**NCC LIR** Within their LIR, NCC raise a number of issues. Can both parties please explain what the latest position is in respect of the Transport Assessment (TA) and provide a timeframe towards providing a clear statement to the examination. In the event that additional work is needed, when might this expect to be submitted to the examination?	The Applicant has held discussions with NCC on queries to date and is very grateful to officers for their time. Matters discussed include: • Discussing the access junction plans and committing to attach them to the Transport Assessment report; • Discussing the barred route strategy to clarify the points relating to access routes and traffic impact; • Agreeing to provide a Wear & Tear Agreement in the oCTMP; • Discussing the access strategy and access locations / functions; • Adding a barred route plan to the Transport Assessment to help clarify which routes are barred; • Confirming actions to review and monitor the oCTMP mode share; and • The delivery method for the junction design and permitting. Matters outstanding are: • Providing a briefing note on the A57 access junction. This will describe the bypass option of Ragnall in detail and will include further information on the need for the A57 junction, including the provision of a Stage 1 RSA; • Provision of a Stage 1 RSA for NCC junctions; and • Updated accident data for 2024 and 2025.

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			These items are being developed and will be discussed with NCC as soon as the deliverables are ready. Further details are expected to be ready for Deadline 3.
Q18.0.9	The Applicant	**Cumulative traffic assessment** The revised TA submitted by the Applicant at Deadline 1, now contains a cumulative assessment, however, a daily total number of vehicles has been given. Can the Applicant please provide a peak hours assessment.	The Applicant is able to provide further detail to assist the ExA in response to this question. It would be helpful to understand what is required, in order to ensure the information provided is the most helpful for the ExA. There are two key types of peak hours assessment the Applicant could provide: • Traditional network peak hours; or • Development peak hours. The development traffic operates outwith traditional network peaks (0800-0900hrs and 1630 – 1730hrs). A network peak assessment therefore may not coincide with the peak of development traffic and vice versa. This may not fully review the worst case impact that construction traffic could have. The IEMA guidelines "The Environmental Assessment of Traffic and Movement" effect criteria are generally set for daily traffic impact reviews rather than hourly flows. The Applicant can provide a percentage impact review for set hours, but a full EIA assessment for peak hours may not be fully possible. Hourly flows can be developed and provided, however this will take time to estimate and extract hourly traffic from the traffic surveys, depending on the type of assessment requested. Estimates may be required for third party cumulative schemes where hourly data is not available. Can the ExA please confirm if they require an hourly assessment for the traditional network peak hours or development peak hours? Subject to confirming the type of peak hour assessment preferred by the ExA, this information can be provided at Deadline 3.

ExA Q Ref	Respondent	Question Summary	Applicant Response
Cumulative Effects			
Q19.0.2	The Applicant	**Cumulative Effects** In the first bullet point under paragraph 18.5.22 of Chapter 18 of the ES reference is made to the siting of a substation. Please provide a plan identifying where this is proposed to be located. Two schemes are identified as having potential cumulative effects – a solar farm ref 21/01577/FULM and the North Humber to High Marnham NSIP. Please provide plans identifying their respective red edge outlines, (accepting that the NSIP is yet to be applied for, the most up to date red edge currently available).	As set out in paragraph 18.5.18 of ES Chapter 18: Cumulative Effects [APP-047], the DCO application does not include proposals for the new substations, which will instead be brought forward through separate applications. Whilst the location of the substation is unknown, the latest available information assumes the substation could be located anywhere west of the existing High Marnham substation in Work Area No. 4. Given this uncertainty, the cumulative assessment has adopted a conservative approach, considering the potential for the substation to be located in any part of this area, to the west of the existing substation in Work Area No 4. The cumulative assessment has reported the worst-case effects accordingly. A plan showing the red edge outlines of the two schemes, along with the Proposed Developments Order Limits, is provided in Figure 1 included within this response.
Q19.0.3	The Applicant	**Cumulative Effects** WLDC in their LIR identify concern that the Cumulative assessment to date does not assess the potential worst-case scenario in excluding some of the NSIP developments recently consented or which have the potential to be consented in a time frame that could overlap with this project. Please explain the reasoning behind the cumulative assessment and justification for the exclusion of the projects listed. To provide certainty would it not provide a fuller picture to include all the projects listed to ensure the worst-case scenario	West Lindsey District Council's assertion that the cumulative assessment has excluded certain NSIP developments is incorrect. 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* (https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment). The methodology comprises four stages: 1. Establishing a long list of other existing and/or approved developments; 2. Establishing a shortlist of other existing and/or approved developments; 3. Information gathering; 4. Assessment.

ExA Q Ref	Respondent	Question Summary	Applicant Response
		has been considered, and possible mitigation planned for?	The long list of other developments was agreed with all relevant councils by 14 January 2025 to enable the assessment to proceed. This list is provided in APP-146, with scheme locations illustrated in the figures in APP-079. It is noted that for Deadline 2 the long list has been updated following comments at Deadline 1 to provide further detail on the temporal scope, as well as to include Leoda Solar Farm and Meridian Solar Farm. As detailed in paragraph 18.3.21 of APP-047, a precautionary approach, exceeding PINS guidance, was adopted, considering any Battery Energy Storage System (BESS) or solar farm proposals within Nottinghamshire or Lincolnshire. The certainty of other developments was evaluated using the tiered approach set out in PINS advice, and the potential Zone of Influence (ZoI) of the Proposed Development's construction, operation (including maintenance), and decommissioning was assessed for each environmental aspect. The process of refining the long list to the shortlist is detailed in APP-146. As shown in Technical Appendix APP-146, NSIP developments were considered but excluded from the shortlist where they fell outside the ZoI for each environmental aspect. Discounting North Humber to High Marnham which is within the Order Limits, only the biodiversity and hydrology ZoI's intersect with other schemes. For clarity, Figure 2 of this response presents the environmental aspect ZoIs alongside the order limits for the nearest NSIP developments, illustrating which schemes fall within those zones. For biodiversity, the 10 km ZoI for International/European Sites overlaps with other schemes; however, there are no International or European Sites within these areas, and therefore no likely significant effects are anticipated. For hydrology, a site-specific Flood Risk Assessment (FRA) along with supporting Surface Water Drainage Strategy will be required with each NSIP development, which would be agreed with the Environment Agency (EA) and Lead Local Flood Authority (LLFA), this would ensure that no significant cumulative effect is expected.

ExA Q Ref	Respondent	Question Summary	Applicant Response
			Separate from the ZoI considerations, cumulative transport effects have been addressed within the Transport Assessment, and subsequently within the air quality and noise modelling assessments. Section A.12.7 [REP1-045] identifies the committed developments and provides the associated traffic trip data for the road links used cumulatively by both the committed developments and the Proposed Development, which have then been used in the assessments. A Joint Interrelationship Report has also been submitted for Deadline 1 [REP01-074], assessing the cumulative effects of the Proposed Development alongside the nearest NSIP schemes. This demonstrates that no likely cumulative effects arise in relation to the Cottam Solar Project, Gate Burton Energy Park, West Burton Solar Project, or Tillbridge Solar, as the separation distances are sufficient to preclude any interaction. These findings align with the conclusions of the Tillbridge Joint Interrelationship Report (EN010142-001196-Tillbridge Solar Limited - 7.6 Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Part 1 of 3 - Revision 2 (tracked) .pdf), which similarly found no significant cumulative effects between these NSIPs and One Earth. Overall, the Joint Interrelationship Reports confirm that for the NSIP solar schemes there are no significant inter-project cumulative effects on any environmental aspect. However as noted in Q19.0.2 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.

Appendix A One Earth Consent Envelope

Development Consent Order – consent for "authorised development" (Art 3(1) Schedule 1 of the dDCO)

Other provisions in the dDCO controlling the authorised development (excl requirements) including how other certified documents are secured or given effect

Documents or details for approval or secured
Works plans (Art 3(2))
Environmental Statement (Art 3(3), 5(3), final paragraph of Schedule 1, Schedule 15, paragraph 2(3))
Streets, rights of way and access plans (Part 3)
Vegetation removal plans & landscape and ecology management plan (Art 39)
Protective provisions (Art 43, Schedule 14)

one earth solar farm

One Earth proposed "consent envelope"

Documents in green are certified documents

Requirements (Art 3(1), Schedule 2)

Detailed design

Requirement	*Documents or details for approval or secured*
R5 (detailed design approval)	outline design parameters height parameter plan details approved in relation to: battery safety management plan, land and ecology management plan, fencing details, drainage management plan, archaeology (oCEMP / oWSI), operational noise (ES), PRoW management plan
R7 (battery safety management)	Battery safety management plan > Outline battery safety management plan
R8 (landscape and ecology management plan)	Landscape ecology management plan > outline landscape and ecology management plan
R9 (biodiversity net gain)	Biodiversity net gain strategy > outline landscape and ecology management plan
R10 (fencing and other means of enclosure)	Fencing details > outline design parameters
R11 (drainage)	Drainage management plan > Flood risk assessment and outline drainage strategy
R12 (archaeology)	Archaeological mitigation strategy > outline construction environmental management plan (anticipated to be updated to include outline WSI)
R15 (construction traffic management plan)	construction traffic management plan > construction traffic management plan
R16 (operational noise)	Operational noise assessment > chapter 15 ES
R18 (public rights of way management plan)	public rights of way management plan > outline public rights of way management plan, streets, rights of way and access plans

Requirements controlling construction

Requirement	*Documents or details for approval or secured*
R3 (phasing)	Phasing plan
R6 (community liaison group)	Community liaison group terms of reference
R7 (battery safety management)	Battery safety management plan > Outline battery safety management plan
R8 (landscape and ecology management plan)	Landscape ecology management plan > outline landscape and ecology management plan
R10 (fencing and other means of enclosure)	Fencing details > outline construction environmental management plan
R11 (drainage)	Drainage management plan > Flood risk assessment and outline drainage strategy
R12 (archaeology)	Archaeological mitigation strategy > outline construction environmental management plan (anticipated to be updated to include outline WSI)
R13 (construction environmental management plan)	construction environmental management plan > outline construction environmental management plan
R15 (construction traffic management plan)	construction traffic management plan > construction traffic management plan
R17 (skills, supply chain and employment)	skills, supply chain and employment > outline skills, supply chain and employment plan
R18 (public rights of way management plan)	public rights of way management plan > outline public rights of way management plan, streets, rights of way and access plans
R19 (soil management plan)	soil management plan > outline soil management plan
R21 (ground conditions)	Site investigation and risk methodology (and further steps depending on outcome of investigation) – preliminary risk assessment, appendix 8.2, chapter 8 of ES

Requirements controlling operation & maintenance

Requirement	*Documents or details for approval or secured*
R6 (community liaison group)	Community liaison group terms of reference
R7 (battery safety management)	Battery safety management plan > Outline battery safety management plan
R8 (landscape and ecology management plan)	Landscape ecology management plan > outline landscape and ecology management plan
R9 (biodiversity net gain)	Biodiversity net gain strategy > outline landscape and ecology management plan
R10 (fencing and other means of enclosure)	Fencing details > outline design parameters
R11 (drainage)	Drainage management plan > Flood risk assessment and outline drainage strategy
R14 (operational environmental management plan)	operational environmental management plan > outline operational environmental management plan
R16 (operational noise)	Operational noise assessment > chapter 15 ES
R17 (skills, supply chain and employment)	skills, supply chain and employment > outline skills, supply chain and employment plan
R18 (public rights of way management plan)	public rights of way management plan > outline public rights of way management plan, streets, rights of way and access plans
R19 (soil management plan)	soil management plan > outline soil management plan

Requirements controlling decommissioning

R6 (community liaison group)	*Documents or details for approval or secured*
R7 (battery safety management)	Battery safety management plan > Outline battery safety management plan
R19 (soil management plan)	soil management plan > outline soil management plan
R20 (decommissioning and restoration)	Decommissioning environmental management plan > outline decommissioning environmental management plan

Sub Plans Secured

Primary Plan	Sub Plan secured by primary plan
Outline construction environmental management plan	• Outline Site Waste Management Plan • Outline surface water drainage strategy plans • Dust management plan • Materials management plan • Emergency response plan • UXO management plan • Water management plan • Flood risk management action plan / method statement • Construction noise monitoring plan • Stakeholder communications plan
Outline operational environmental management plan	• Outline surface water drainage plans • Outline Site Waste Management Plan • Emergency response plan • Flood management plan • Risk Assessment Method Statement / Operating Procedure
Outline decommissioning environmental management plan	• Decommissioning Traffic Management Plan (DTMP) • Outline Site Waste Management Plan • Materials Management Plan • Water Management Plan • Emergency Response Plan
Battery Safety Management Plan	• Emergency Response Plan • Risk Management Plan
Outline construction traffic management plan	• Staff Travel Plan

Appendix B Archaeology Technical Paper

B.1 Consideration on the extent of Archaeological Investigation

B.1.1 Context

B.1.1.1. This technical note has been prepared by Iceni Projects on behalf of the Applicant in response to the Examining Authority's First Written Question on Historic Environment (Q11.0.1). This follows discussion concerning this matter during Issue Specific Hearing 1 held on 9 and 10 July 2025.

B.1.1.2. Q11.0.1 asks:

Extent of investigation

NPS EN-3 at paragraph 2.10.113 states "the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets."

Can each party provide evidence to support their position in respect of the suitability of the investigations that have been undertaken, and why either further trial trenching or other form of investigation should or should not be carried out.

B.1.1.3. This note provides a response to this question and additional information regarding the approach taken to the archaeological investigation and data collection, in order to demonstrate the suitability of the work undertaken to inform the DCO submission for the One Earth Solar Farm (the Proposed Development).

B.1.2 Approach to assessment and data collection

B.1.2.1. During the ISH1, the Examining Authority requested further clarity on the rationale behind the approach to archaeological investigations, and on the level of confidence on the Significance assessment carried out to date.

B.1.2.2. The approach to archaeological data collection to inform the Buried Heritage Environmental Statement (ES) Chapter [APP-038], and the One Earth Solar Farm DCO has been designed in compliance with National Policy (NPPF, NPS - EN-1, NPS EN-3), and professional standards and guidance, including but not limited to the Chartered Institute for Archaeologists' (CIfA) *Code of*

*Conduc*t and the CIfA *Standard and Guidance for Evaluation*, and was developed in collaborative consultation with the Archaeology Advisory Teams to the Local Planning Authorities (LPAs) and Historic England.

Desk-Based Assessment

B.1.2.3. As per NPS EN-1 paragraph 5.9.11, NPS EN-3 paragraph 2.10.113, and Paragraph 207 of the NPPF, the Applicant undertook an appropriate Archaeological Desk-Based Assessment (DBA). The Study Areas for the DBA were agreed with the Archaeology Advisory Teams to the LPAs and Historic England at Scoping stage. The Study Areas are also compliant with the Lincolnshire County Council's *Guidance for large schemes including NSIPs and EIAs, General Scoping Opinion for the Historic Environment*.

B.1.2.4. The Archaeological DBA, in compliance with CIfA's *Standard and guidance for historic environment desk-based assessment,* was undertaken by suitably qualified authors, and included a Geoarchaeological Deposit Model and a LiDAR and Aerial Photography Archaeological Landscape Assessment[10].

B.1.2.5. The assessment of development impacts on archaeological assets follows established best practice guidance, including CIfA's *Standard and Guidance for Archaeological Desk-Based Assessment* and Historic *England's Good Practice Advice in Planning Note 3: The Setting of Heritage Assets*. The assessment carefully considers both the importance of archaeological sites and the extent of potential impacts from the development, applying recognised professional standards.

B.1.2.6. As per EN-1 paragraph 5.9.11 and paragraph 207 of the NPPF, to describe the Significance (Sensitivity) of any heritage assets affected, the Archaeological DBA was followed by proportionate evaluation work, which as per CIfA's *Standard and Guidance for Evaluation*, included both non-intrusive and intrusive fieldwork.

Non-intrusive assessment

B.1.2.7. A non-intrusive geophysical survey was undertaken between January 2024 and December 2024 across approximately 1,261.5 hectares of land within the Order Limits. The survey of the area adjoining the former High Marnham Power Station, approximately 55 hectares, had largely been already carried out during the evaluation works for the High Marnham Green Energy Business Park in 2023.The survey determined as far as is reasonably possible, the nature of the detectable archaeological resource within the Order Limits.

[10] A full list of the sources consulted for the Archaeological DBA is included in **6.21 Appendix 9.3: Archaeological Desk-Based Assessment [APP-110 to APP-115].**

2.1.3 The methodology of the non-intrusive assessment is presented in Section 11.3 of the Buried Heritage ES Chapter (APP-038) and was agreed with the Archaeology Advisory Teams to the LPAs and Historic England, acknowledged in the Relevant Responses and follows legislative and policy requirements as well as best practice guidance.

Intrusive trial trenching evaluation

B.1.2.8. In line with the CIfA's *Standard and Guidance for Archaeological Evaluation*, the Proposed Design and maximum parameter for the Proposed Development, the Archaeological DBA and the results of the geophysical survey informed the scope of the intrusive trial trenching evaluation carried out to inform the Buried Heritage Environmental Statement (ES) Chapter [APP-038].

B.1.2.9. In line with the proportionality requirement expressed in CIfA guidance (including but not limited to *Standard and Guidance for Archaeological Evaluation)* and NPPF paragraph 207, a tiered system was implemented to define the scope of evaluation, to make it proportionate to the expected asset's significance and sufficient to assess potential impacts. The rationale for the tier system implemented for the trial trenching evaluation is summarised below:

> Key areas with the highest potential impact from the Proposed Development (substation and BESS options parameters), and with limited flexibility to design around an unexpected find during the Detailed Design phase, have been identified as part of the initial design process. These areas have been investigated through a 3% trial trenching sample.

> An area of special archaeological interest was identified by the Archaeological Advisory Teams to the Local Planning Authorities (LPAs) and Historic England for its significant archaeological potential (Ragnall) in their scoping response. As above, this was investigated through a 3% trial trenching sample.

> Additional areas outside of those detailed above but identified in the Desk-Based Assessment and/or geophysical survey as being of archaeological potential were evaluated through a 2% trench sample. This allowed further data collection and confirmation of the results of these initial surveys, by objectively testing the results of the geophysics against the results of intrusive evaluation.

B.1.2.10. The trial trenching evaluation included, as appropriate, trenches targeting features identified by the geophysical survey as well as trenches targeting apparently 'blank' areas within the selected sites of investigation.

B.1.2.11. Site-Specific Written Scheme of Investigations (SSWSI), setting out the scope, methodology, and research questions were produced by a suitably qualified

archaeological contractor and approved by the Archaeology Advisory Teams to the LPAs and Historic England prior to of any archaeological work.

B.1.2.12. The results of the trial trenching evaluation carried out to date were circulated to the Archaeology Advisory Teams to the LPAs and Historic England on the 24th of July 2025. The Preliminary Results of the trial trenching evaluation have been included and informed the Buried Heritage ES Chapter (APP-038) and its Appendices.

B.1.2.13. The approach taken for the assessment was entirely compliant with policy, guidance and good practice as set out above. The intrusive investigation undertaken was informed by desk based and non-intrusive investigation, and the proposals for the Proposed Development, in order to ensure a targeted and proportionate approach, reflecting the need to be able to identify likely significant effects in the ES assessment in accordance with the EIA Regulations.

B.1.3 Additional Work

B.1.3.1. The Applicant's position is that additional trial trenching or other forms of investigation should be carried out, post-consent, in order to inform the mitigation, reflecting the detailed design of the Proposed Development. The additional proposed work is not required in order to sufficiently identify likely significant effects in the Buried Heritage ES Chapter (APP-038) and inform the DCO submission but will be carried out to inform the Detail Desing of the Proposed Development and the required mitigation strategy.

B.1.3.2. The assessment work that informed the Buried Heritage ES Chapter (APP-038) identified 29 discrete locations where buried archaeological remains may survive within the Order Limits.

B.1.3.3. In line with Paragraph 2.8 of CIfA's *Universal guidance for archaeological field evaluation* that states *"Wherever possible, non-intrusive methods should be considered as the first option, with intrusive techniques used only where necessary to achieve the purpose of the archaeological field evaluation"*, only 9 of these locations were subject to intrusive archaeological evaluation. The selection of these areas followed the tier system presented in paragraph 1.2.10 of this Technical Note, focusing on areas where the Proposed Development had the least flexibility (Parameters Options), and there the potential for significant archaeological assets was considered the highest (Ragnall, Water Reservoir, land adjacent to the Roman Fort Scheduled Monument), offsetting archaeological and design risks while not causing a localised impact on buried heritage assets exceeding that of the proposed development itself.

B.1.3.4. An additional phase of trial trenching is currently being designed in consultation with the Archaeological Advisory Teams to the LPAs and Historic

England and included in the draft Outline Written Scheme of Investigation (OWSI) (an advanced draft of which will be submitted at Deadline 3, reflecting discussions between the parties).

B.1.3.5. This will be carried out as a pre-commencement requirement, to investigate the other locations with potential for buried heritage deposits that were identified to inform detailed design and mitigation in these areas.

B.1.3.6. Based on the current design, if the Proposed Development is consented, the following elements will be potentially affecting partially or entirely some of the locations with potential for buried heritage deposits:

- Work No. 1: Solar PV Infrastructure
- Work No. 2: BESS
- Work No. 3: Substations
- Work No. 4: Grid Connection Cable Route
- Work No. 5: Ancillary Works
- Work No. 6: Primary Construction Compounds
- Work No. 7: Highway Works
- Work No. 8: Landscape and Ecology

B.1.3.7. Additionally, and in line with Paragraph 2.10.115 of EN-3, to minimise the risk of buried archaeological remains outside the 29 locations identified, archaeological trial trenching will take place in advance of construction in areas where high impacts arising from the construction activities of the Proposed Development are expected, as per detailed design of the Proposed Development.

B.1.3.8. These areas were not the focus of the targeted and proportionate trial trenching undertaken for the purposes of the ES. however, they proposed for further investigation post consent. This approach has been taken considering that these are areas where there is more flexibility to avoid or mitigate impacts on unexpected archaeological finds at Detailed Design (i.e. avoiding new residual likely significant effects that have not already been identified in the ES) and where there is lower potential for archaeology (and so less scope generally for impacts).

B.1.3.9. The additional areas proposed for pre-commencement archaeological evaluation will be presented and discussed in the OWSI, and the scope of the evaluation will be defined in consultation with the Archaeological Advisory Teams to the LPAs and Historic England.

B.1.3.10. The information collected as part of all the non-intrusive and intrusive archaeological evaluation will inform the detailed design of the Proposed Development and the final Archaeological Mitigation Strategy (AMS) (the outline for which will be appended to the OWSI) to be implemented to offset or minimise any impact on buried heritage assets.

B.1.4 Conclusion

B.1.4.1. The extent and scope of the archaeological data collection are 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 the information submitted meets the requirements of the NPPF, NPS EN-1 and NPS EN-3, and EIA Regulations and provides an adequate baseline for the assessment of impacts, to demonstrate that the Proposed Development retains enough flexibility to both accommodate any significant archaeology discovered during the additional evaluation work to be carried out post-consent, and to allow proportionate mitigation measures to be successfully implemented.

B.1.4.2. Carrying out any further trial trenching evaluation as a pre-commencement requirement (as opposed to pre-consent) helps to avoid disproportionate harm to buried heritage deposits that could otherwise result from the partial or total removal of assets during the archaeological investigation at a time when it is not certain that consent for the Proposed Development will be granted and therefore there is no guarantee of the associated benefits.

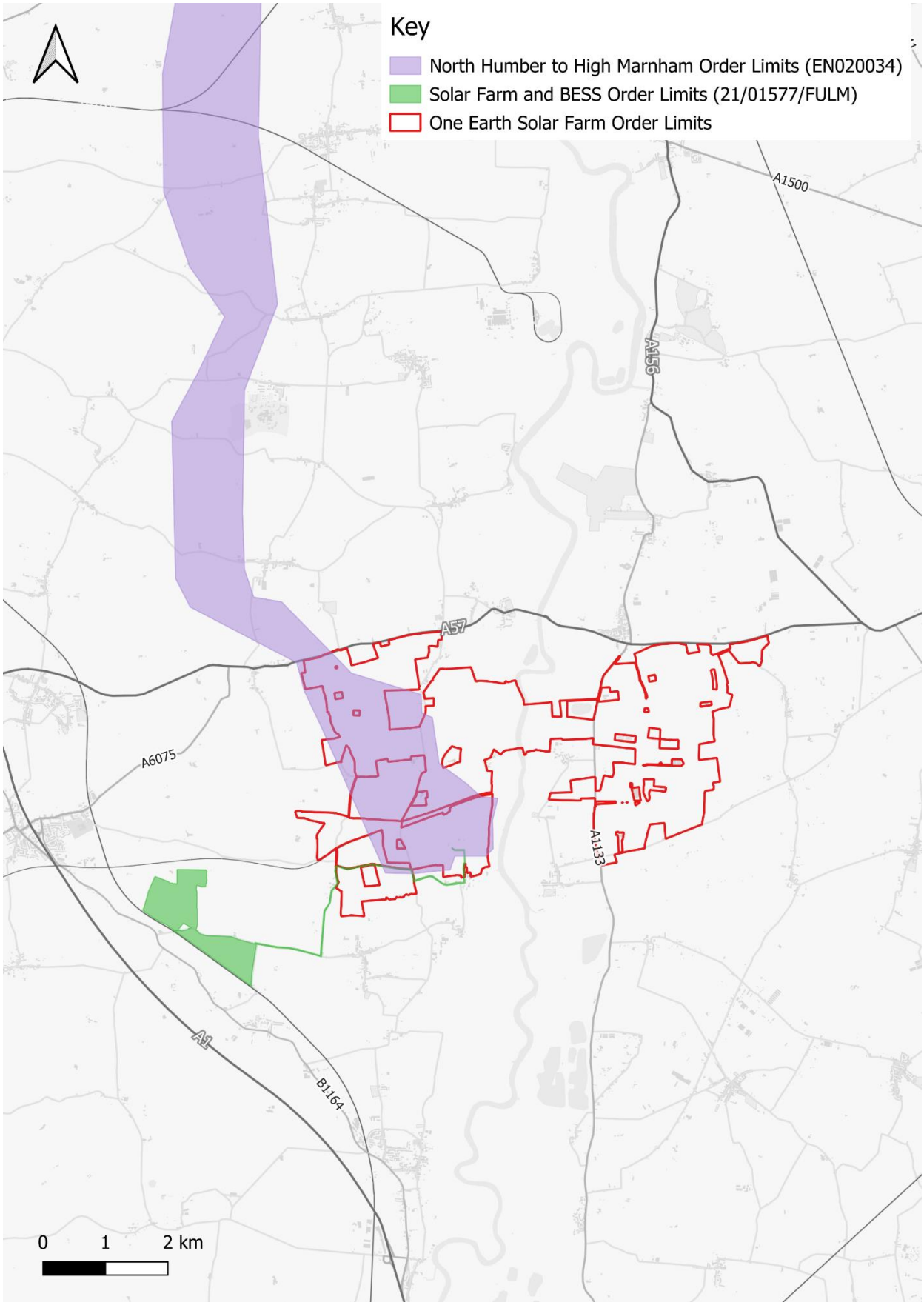
B.1.4.3. The phased approach to assessment, utilising a suite of techniques to build upon and inform one another, is comparable to other DCO solar farm schemes (Mallard Pass, Springwell, and Longfield in Essex). Large amounts of pre-determination trenching are not supported by guidance or by the ethical principle of minimising harm to the historic environment. In their reply to the Relevant Representation (RR-019), Historic England in relation to the proposed approach to trial trenching, stated that

B.1.4.4. for this approach to be successful, the applicant must maintain flexibility in their design approach to facilitate the appropriate mitigation through design in response to potential archaeological remains forthcoming. As in cases where additional assessment stage trial trenching was to be undertaken post-DCO, there needs to be a mechanism whereby the results of that work have a material bearing upon the subsequent phase of archaeological mitigation scheme.

B.1.4.5. The phased approach to assessment guarantees the flexibility of both the archaeological data collection and of the Proposed Development Design. With adequate control mechanism, presented in the OWSI, to make sure that the

results of any additional archaeological work carried out post-determination will inform the Detail Design and the required mitigation strategy.

Appendix C Figures



GENERAL NOTES:

1. This drawing is to be read in conjunction with all engineer's, architect's or other relevant drawings and specifications.
2. All dimensions and levels are subject to detailed design.
3. All works to be carried out in compliance with the requirements of the relevant statutory authorities and regulations.

Drawing Notes:

Revision History

Rev	Date	By	Detail
01	13.08.2025	LOG	First Submission

Project

One Earth Solar Farm

Drawing title

Order Limits for Applications EN020034 and 21/01577//FULM

Drawing details

Applicant Response to ExA's First Written Questions (Q19.0.2)

Date	Drawn	Checked
13.08.2025	CP	GP

Client

one earth solar farm

Consultant

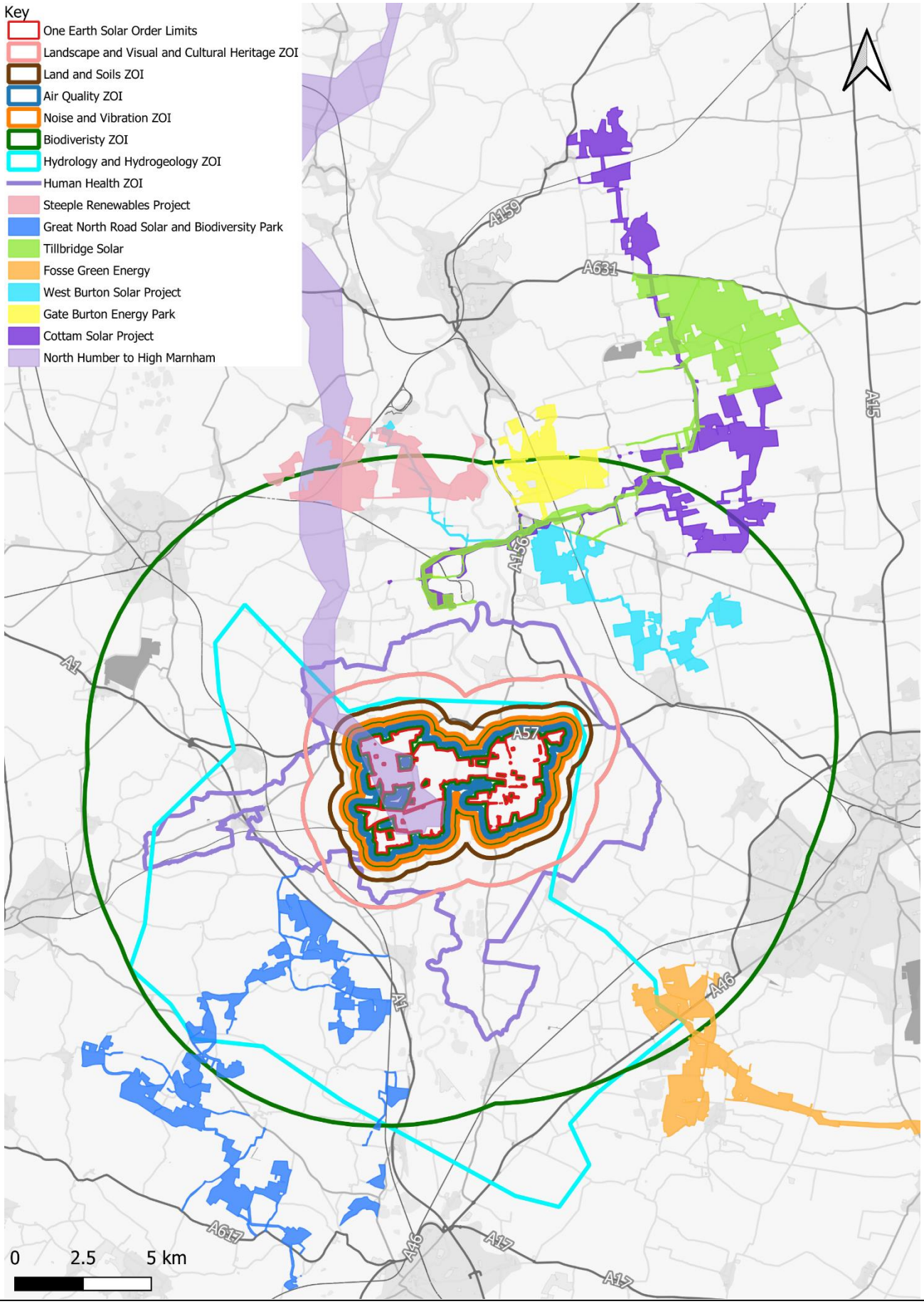
Logika GROUP

Drawing number

14529A-EX1

Revision

00



GENERAL NOTES:

1. This drawing is to be read in conjunction with all engineer's, architect's or other relevant drawings and specifications.
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Drawing Notes:

Revision History

Rev	Date	By	Detail
01	13.08.2025	LOG	First Submission
02	19.08.2025	LOG	Second Submission

Project

One Earth Solar Farm

Drawing title

Order Limits Zones of Influence (ZoI) including Solar NSIP Projects

Drawing details

Applicant Response to ExA's First Written Questions (Q19.0.3)

Date	Drawn	Checked
19.08.2025	CP	GP

Client

one earth solar farm

Consultant

Logika GROUP

Drawing number

14529A-EX1

Revision

02

one earth

solar farm