

One Earth Solar Farm

Volume 9.0: Other Post-Submission Documents [EN010159]

Applicant Response to Deadline 2 Submissions

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Contents

1.	Introduction	3
1.1	Purpose of the Report	3
2.	Applicant Response Table	4



1. Introduction

1.1 Purpose of the Report

- 1.1.1 The purpose of this document is to provide the Applicant's response to the written submissions made by Interested Parties at Deadline 2.
- 1.1.2 To avoid repetition the Applicant has only provided a full response to comments that make points that have not been addressed by the Applicant previously in the Examination. Where the Applicant has not commented further on the responses of Interested Parties at Deadline 2, that should not be taken as being acceptance of the Interested Parties' position by the Applicant the Applicant has sought to focus its responses in order to avoid unnecessarily creating additional written responses that only reiterate its position, as already set out. Therefore, where the submissions by Interested Parties do not raise new matters, or (2) raise matters which the Applicant considers it has already appropriately responded to, no further response to those submissions has been included in this response document. This document only includes matters the Applicant has new or further comments on which arise from the submissions of Interested Parties.
- 1.1.3 To further 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. Applicant Response Table

App Ref	Ref	Respondent	Question Summary	Applicant Response			
General a	General and cross-topic questions						
D2R1	9.7 Draft agenda for Accompanied Site Inspection [REP1-080] [REP2-091]	West Lindsey District Council	WLDC note that there is only one stop within West Lindsey in stop 8. Whilst stop 9 is also within West Lindsey it is a scheduled "Lunch stop and comfort break". WLDC considers that an additional stop should be made at the layby on A1133 (53°14'36.0"N 0°45'37.5"W) (What3Words Monkeys.stunner.newlywed). This is especially important given that sheets 12 and 13 of the height parameter plans (submitted in 2.5 Site Layout Plans [APP-016]) indicate that development on the BESS site will be up to 13.5m in height above ground level. A stop at this location will allow consideration of this proposed height against the existing Anglian Water treatment plant building, which is 10m to its ridge height and is currently the tallest structure adjacent to the BESS site.	To develop the proposed agenda for the ASI, the Applicant reviewed the Unaccompanied Site Inspections (USIs) that the ExA had already completed. This included an initial USI from 19-22 May [EV1-001], as well as a second USI on 8 July [EV1-002] to this suggested location. Because the ExA had already visited this location, there was no need to include it again for the ASI.			
D2R2	Impact of Human Health including Mental Health [REP2-089]	South Clifton Parish Council	LCC, we note, considers that further assessment of the effects of EMF on pacemakers should be undertaken and until they are 'assured' will consider that EMF is a Significant Negative effect. Nottinghamshire County Council (NCC) are in agreement and would like assurance on this issue. SCPC are	An Electromagnetic Fields (EMF) Impact Assessment has been undertaken [APP-083], which considers the proposed cabling routes, the type and specification of cabling, and the proximity of sensitive receptors. The assessment demonstrates that there would be no significant effects arising from EMFs associated with the Proposed Development on human or ecological receptors.			



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			aware of several villagers that have medical conditions that could be affected by EMF and feel that more research is needed to be done by the applicant to ensure the safety of our residents.	In line with PINs Guidance Technical Advice Page for Scoping Solar Development, the assessment addresses the location, routing, and voltages of all cables operating above 132 kV, and includes a risk-based evaluation of potential impacts. The results confirm that predicted EMF levels remain well below the ICNIRP (International Commission on Non-Ionizing Radiation Protection) reference levels adopted in UK policy. With respect to sensitive medical users, such as individuals with implanted devices (e.g., pacemakers or defibrillators), EMF exposure from underground and above-ground cabling will be negligible. This is because field strengths fall rapidly with distance and are significantly mitigated by cable design (e.g., shielding and phasing). Consequently, the operation of such medical devices is not expected to be affected. The assessment also considered ecological receptors, confirming that EMF emissions are not anticipated to result in any significant disturbance or effects on species or habitats within or adjacent to the Proposed Development. Overall, the EMF assessment provides robust evidence that the Proposed Development will comply with all relevant health and safety standards, with no significant risks to human health, including those with medical implants, or to the natural environment.
D2R3	Funding	South Clifton Parish Council	SCPC, following recent news articles, have serious concerns about Orsteds' financial	The Applicant has responded to a similar question from the ExA (ExQ9.0.2) at Deadline 2 in the Applicant Response to



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	[REP2-089]		situation and its' ability to fund this project. The Time recently reported that its shares had dropped 80% since 2021 and Bloomberg are predicting 'more volubility to come'. We feel that should this application be approved, it will have a lasting, irreversible effect on this community. Even worse though, would be for it to be approved and then the funding cut during construction, leaving our beautiful landscape desolate. We ask that the ExA fully satisfy themselves that the funding for this project is secure and safe through its construction, its 60-year operational phase and until it is fully decommissioned.	ExA's First Written Questions [REP2-084]. The Funding Statement [REP2-013] demonstrates that funding is available to construct the Proposed Development, allowing for inflation and project contingencies, and compulsorily acquire the land required (should such powers be granted). Article 46 of the Draft DCO [REP2-009] 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). Applicants are not required to demonstrate funding available for operation and decommissioning at this early stage, and it is typical for such funding to not be committed until after a DCO has been granted. Once the Proposed Development commences, the Applicant will be legally required to proceed with completing construction, operation and decommissioning in accordance with the DCO. The Applicant is also commercially incentivised to proceed with the Proposed Development once it commences, in order to enter the revenuegenerating operational phase. In addition to the Applicant's liabilities under the requirements of the DCO, and the possible criminal sanctions were these requirements to be breached that the Proceeds of Crime Act 2002 is a further deterrent on the Applicant. The elements of the installed solar farm represent a valuable asset for the Applicant, so it would be in its interests financially, to decommission the site in order to recycle or sell those components. If the undertaker of the Order went into liquidation, its assets would be sold off to fund the decommissioning under the legal requirement.



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Draft Dev	Draft Development Consent Order							
D2R4	3.1 Draft Development Consent Order (Clean) (Rev 2) [REP1-007] [REP2-091]	West Lindsey District Council	WLDC note that the time period for discharge of DCO Requirements set out in paragraph 2 of Schedule 15 of the draft DCO (dDCO) remains at 10 weeks. As set out in paragraph 6.10 of WLDC Written Representations the Secretary of State has previously concurred with WLDC and concluded in the Cottam decision that 13 weeks would be most appropriate to account for the number of applications coming forward in Lincolnshire. In his decision letter on Cottam the Secretary of State discusses this issue at paragraphs 4.107 to 4.110. At paragraph 4.110 the Secretary of State states: The Secretary of State has carefully considered the suggested discharge periods and concluded that a compromise of 13 weeks would be most appropriate to account for the number of applications coming forward in Lincolnshire, whilst seeking to avoid delays to the progress of the Proposed Development. WLDC would again request that the approval timescales for the discharge of requirements is accordingly amended in the dDCO to 13 weeks.	The Applicant updated the dDCO at Deadline 2 to increase this timeframe to 12 weeks [REP2-009]. The Applicant's position with respect to any further increase in the timeframe remains as set out in its response to written representations submitted at Deadline 2 [REP2-082] and its response to the Local Impact Reports [REP2-083].				
D2R5	7.5.1 Operational Environmental Management	West Lindsey District Council	We note the commitment in additional section 2.13 of the Operational Environmental Management Plan to submit a	The Applicant considers that it is suitable to leave this commitment in the outline OEMP as the Applicant is required to comply with the approved OEMP (including provisions				



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	Plan Rev 2 [REP1-049] [REP2-091]		decommissioning management plan after a cumulative total of 36 months of the site generating no electricity. However, WLDC consider that this commitment should be included in the draft Development Consent Order as part of Requirement 20.	related to extended outages) in accordance with Requirement 14 of the draft DCO. The approach adopted is the same as that taken for Heckington Fen, where the same outage provisions are included in section 6 of the outline operational environmental management plan.
Biodivers	sity			
D2R6	ES Chapter 6 Biodiversity [REP2-085]	Lincolnshire County Council	ES Chapter 6 Biodiversity Great crested newts: LCC notes that additional eDNA surveys for great crested newts have been carried out in 2025 and that all results were negative. However, LCC notes that several ponds both within the DCO area and in the vicinity have not been surveyed due to access constraints. The results of the desk-based assessment suggest that there remains potential for undetected populations of great crested newts in the area. Table 6.6, C15 confirms that the Ecological Clerk of Works will be responsible for undertaking checks for protected species prior to vegetation clearance and that European Protected Species are found works will need to stop until a license is obtained from Natural England. Bats: LCC welcomes the commitment in soft felling of trees with potential. The OCEMP and Commitments Register do not yet appear to have been updated to reflect this change.	The Applicant notes the response and has updated the Outline Construction and Environmental Management Plan [REP2-049] and the Commitments Register [REP1-063] at Deadline 3 for consistency. Amongst other amendments, this is to account for the soft felling of trees with potential for bats.



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			Biodiversity Net Gain: LCC welcomes the commitment at Table 6.6, C35 to deliver at least 10% BNG. Given the scale and nature of the development LCC would expect that significantly more than 10% can be delivered in line with current predictions in the Applicant's BNG Assessment (REP1-040). LCC notes and welcomes the additions of C36 (further habitat surveys), C37 (veteran trees) and C38 (riparian mammal surveys) in Table 6.6. The Commitments Register and securing mechanism documents should be updated to reflect these additions.	
D2R7	ES Chapter 6 Biodiversity [REP2-085]	Lincolnshire County Council	ES Appendix 6.5 Breeding Bird Baseline (REP1-034) LCC notes that the timing (morning) of breeding bird surveys does not specifically account for Schedule 1 species, such as barn owl and quail, whose breeding activity may not necessarily be encompassed within the scope of a standard breeding bird survey due to the timing of their breeding activity. Both barn owl and quail were detected in surveys in 2023 and this raises the possibility of the species' presence being underestimated. LCC recommends that additional specific surveys are undertaken prior to construction to ascertain the likely presence absence of species such as but not limited to barn owl and quail.	The Applicant notes the comment and has updated Chapter 6 Biodiversity [REP1-023], the Outline Construction Environmental Management Plan [REP2-049] and the Commitments Register [REP1-063] at Deadline 3 to allow for appropriate surveys for barn owl and quail to be undertaken to ensure compliance with the Wildlife and Countryside Act 1981 (as amended).



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D2R8	ES Chapter 6 Biodiversity [REP2-085]	Lincolnshire County Council	ES Appendix 6.6 Great Crest Newt Baseline (REP1-036) As stated above LCC is of the opinion that there remains potential for great crested newts to be present due to lack of survey coverage of some ponds within and adjacent to the DCO area.	The Applicant notes this response, but is confident the imposition of environmental measure C15 (see Table 6.6 of Chapter 6 Biodiversity [REP1-023]) provides the necessary safeguards to ensure great crested newts are appropriately accounted for. This is secured through Section 7 of the Outline Landscape and Ecology Management [REP2-055].	
D2R9	ES Chapter 6 Biodiversity [REP2-085]	Lincolnshire County Council	Draft Development Consent Order (REP-007) LCC notes the update made in REP1-007 to Requirement 9 Biodiversity net gain. LCC welcomes the Applicant's commitment to delivering biodiversity net gain but disagrees with the use of maximum percentages to be delivered in this Requirement. This is not consistent with the drafting of other recent DCOs which refer to the delivery of minimum percentages of BNG. LCC is of the opinion that a Requirement to deliver minimum percentages in line with predictions in REP1-041 should be used.	The Applicant notes that Requirement 9 was further updated at Deadline 2 [REP2-009] to alter maximum to minimum within the drafting.	
D2R10	Biodiversity [REP2-094]	Environment Agency	RR63 Issue: It is still considered that the feasibility of some of the assumptions made within the BNG report remain to be demonstrated. For example, how can it be assumed that c.17km of ditches can be enhanced to good condition when control of water quality may not be	Ditches within the Order Limits are currently subject to differing levels of management associated with agricultural practices. Table 6.6 in Chapter 6 Biodiversity [REP1-023], has outlined three environmental measure that will improve the condition of ditches for biodiversity; C22, C23 and C30. There are also further environmental measures that will offer in-direct benefits to the ditch network. These are secured through Section 5 of the Outline Landscape and Ecology Management [REP2-055].	



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			entirely within the developer control (good condition requires 'good water quality with clear water')? Prescriptions to ensure requisite aquatic vegetation are also lacking from the LEMP. Similarly, it is unclear how the proposed created floodplain grazing marsh will be 'managed to frequently wet' (as asserted in Table 4-2 of the BNG assessment (Appendix 6-10)). Impact: Outcomes of BNG assessment may be overstated; potential risk the 10% gain in watercourse units is not achievable on site. Solution: Ensure assumptions are realistic and demonstrated to be viable.	Enhancement within the ditch network within the Order Limits aims to achieve all of the following: A) The ditch is of good water quality, with clear water (low turbidity) indicating no obvious signs of pollution. Improvement to management practices within the riparian zone will reduce potential pollutant run-off into the watercourses to ensure good water quality. B) A range of emergent, submerged and floating-leaved plants are present. As a guide >10 species of emergent, floating or submerged plants present in a 20 m ditch length. Changes to ditch management will ensure a range of flora are present within the ditches. Within suitable stretches, aquatic vegetation may initially be introduced if struggling to establish naturally. C) There is less than 10% cover of filamentous algae and or duckweed Lemna spp. (these are signs of eutrophication. Nutrient levels should drop over time as intensive farming is ceased). D) A fringe of aquatic marginal vegetation is present along more than 75% of the ditch. Aquatic marginal vegetation to be encouraged within ditch network. E) Physical damage is evident along less than 5% of the ditch, with examples of damage including: excessive poaching, damage from machinery use or storage, or any other damaging management activities. Management to be sympathetic and considered to ensure limited impacts (see commitment C22). F) Sufficient water levels are maintained - as a guide a minimum summer depth of approximately 50 cm in minor ditches and 1 m in main drains.



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				G) Less than 10% of the ditch is heavily shaded. Ditches will be managed to ensure <10% of any ditch is heavily shaded, partial shading from linear features such as hedgerows / treelines does occur within the Order Limits however habitats will be managed to reduce increase to shading. Vegetation within the riparian zone will be sited to not overshade the ditch. H) There is an absence of non-native plant and animal species. This will be monitored to ensure no INNS noted within footnote 1 occurs within the Order Limits, along watercourses / within the riparian zone. Though not noted on footnote 1, C23 seeks to partner with relevant stakeholders to implement American Mink control within the ditch network on-site. Commitments Register References: C22 The current management of drainage ditches, in line with agricultural practice, involves regular dredging to remove silt build-up from the channel and clearance of either one, or both banks of all vegetation. Fields within the Site will not be ploughed or tilled (except for initial grassland habitat creation), resulting in a reduction in silt accumulation, therefore, the same level of management will not be required. Ongoing management of drainage ditches will involve 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. C23 The scheme will seek to partner with the Greater Lincolnshire Nature Partnership, Waterlife Recovery Trust or other relevant stakeholder organisation to set up and deliver an American mink control project within the ditch network of



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				the Site and the wider landscape. This will be led by the stakeholder group, with funding (part or full) by the Applicant, with the aim of reducing predation pressures on water vole populations present. The approach to delivering this commitment will be included within the scope of Landscape and Ecology Management Plan (LEMP). C30 Field margins (4m wide) along one edge of each field supporting solar PV will be seeded with mixes in line with Countryside Stewardship prescriptions AB8 Flower-rich margins (targeting pollinators in the summer), AB16 Autumn sown bumblebird mix and AB9 Winter bird food (provisioning for farmland bird species in long and/or cold winters), alternated by season. In locations where hedgerows will be allowed to grow to 4m tall mixes will be tailored with fumitory and chickweed that will benefit turtle dove. Riparian seed mixes, including dense tussocky grasses, common reed, and reed canary grass, will be used along draining ditches and banks, incorporating a 2m strip either side of the bank top. These habitats will be suitable for nesting passerines and waders, they will provide cover and foraging opportunities for water voles and suitable nesting habitat for harvest mouse. Grassland habitats will be managed to ensure that target conditions are achieved, through mowing (outside of the main bird breeding season), treatment of weeds and dominating species, and reseeding at regular intervals where required. Cutting regimes will be phased to ensure a range of sward heights at any one time and to prevent the encroachment of scrub species and associated habitat succession.



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D2R11	Biodiversity [REP2-094]	Environment Agency	Issue: 'As part of this a separate watercourse map will be provided within the Appendix 6.10 Biodiversity Net Gain Assessment [APP-093] showing the location of all ditches and watercourses with appropriate colours to differentiate those in different habitat condition'. It would appear this map has yet to be produced Impact: Habitat classifications used to inform BNG assessment have not been verified. Solution: We would welcome opportunity to review the map alongside other information used to support habitat classification (distinctiveness	A figure has been appended at Appendix A as requested.	
			and condition). Information presented within updated Appendix 6-3 paragraph 3.12.8 is noted, further supporting information is requested to support this assertion (that this watercourse is not 'other river or stream').		
D2R12	Geomorpholog y [REP2-094]	Environment Agency	Issue: 8m minimum buffer for watercourses in commitment register, but 10m commitment for action C4 in Table 6.6 Environmental Measures and Securing Mechanisms. Impact:	The Commitments Register [REP1-063] has been updated for consistency at Deadline 3.	



Ref	ef	Respondent	Question Summary	Applicant Response
			Confusion between minimum buffers may be caused by lack of update to the commitments register. Solution:	
			Correct commitments register using the correct (10m minimum) buffer offset	
Coi Env Mai Pla 047	4.1 Outline onstruction nvironmental anagement lan [REP1-47]	West Lindsey District Council	WLDC note the additional text with regards to retained vegetation in table 3.4, indicating a minimum offset from retained hedgerows of 5m. However, it is not clear to WLDC how this will work in the case of the vehicle access that is taken along the northern boundary of Hall Reservoir. This access appears to be only access to the main construction site on the east side of the River Trent. The access is approximately 6.5m wide between the northern boundary fence of the reservoir and the existing hedgerow. The Vegetation Removal Plans in Appendix C of 7.7.1 Outline Landscape and Ecology Management Plan [REP1-053] indicate that this hedgerow will be retained. It is not clear to WLDC therefore how this main construction access will be accommodated within the existing access track route (and	The Vegetation Removal Plan in Appendix C Of the Outline Landscape and Ecology Management Plan [REP2-055] has been updated to show the removal of the corner of the hedgerow on the northern side of the access track in question. The works to be accessed via this track will take place outside of winter months. As such, the existing track will be used in its current form and so no works are proposed to take place to the existing access track other than the placement of crushed aggregate where the track meets the A1133.



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D2R14	Biodiversity and Ecology [REP2-089]	South Clifton Parish Council	SCPC continue to be very concerned about the effect of this application on the wildlife in this area, which is varied and well established. We notice Bassetlaw District Council are concerned about the population of otters and water voles during construction and that BNG delivery habitats should take into account options for water vole improvement. We would hope this approach would be taken to all established wildlife.	The Applicant considers that the overall effect on biodiversity of the Proposed Development will be positive (as described in Chapter 6 Biodiversity [REP1-023] and the Biodiversity Net Gain Assessment [REP1-040].
D2R15	Biodiversity and Ecology [REP2-089]	South Clifton Parish Council	ExA Q7.0.1 queries connectivity across the site and in particular how animals will move about. This is vital to the deer population The applicant has given little or no detail about this, other to say that they would install ramps.	The Applicant has addressed the permeability of the solar farm for deer in their response to the Examining Authority's first written questions [REP2-084] with the further submission of mapping requested by the ExA during the Issue Specific Hearing.
Human He	ealth			
D2R16	Human Health Comments [REP2-085]	Lincolnshire County Council	Overall, due to the scale of the development, the proximity to people's homes, and the lack of consideration of long-term public mental health, the overall impact on health and wellbeing is felt to be negative. We accept that some enhancements, such as the wildflower meadow to the north of North Clifton alongside the River Trent, will potentially have a positive impact.	The Human Health chapter assessed a broad range of factors, including physical activity; community identity, culture, resilience and influence; employment and income for vulnerable groups; climate change mitigation and adaption; electro-magnetic fields; wider societal infrastructure and resource and; health and social care services. Impacts on mental health and wellbeing were primarily assessed in the community identity, culture, resilience and influence section, which explored how the project affects the way people feel about their community due to changes to the physical landscape. The assessment concluded that the impact on mental health and wellbeing would be minor adverse (not significant). However, it acknowledged that



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Ker				some residents living within the Local Study Area may experience anxiety and stress associated with the Proposed Development, particularly during the early stages of the operational phase. These effects are expected to gradually reduce over time as the population becomes more accustomed to the changes, and as biodiversity enhancement measures and planting schemes begin to establish, helping to screen low-level views to soften the visual impact. It is important to note that these impacts are likely to be limited to residential receptors and recreational receptors in close proximity to the Order Limits, representing a minority of the Local Study Area. The assessment adopted a population-level approach, in line with Institute of Sustainability and Environmental Professionals (formally IEMA) guidance, assessing the effects on the whole population within the study area, which comprises of 5,911 people across four Lower Super Output Areas (LSOAs). A range of mitigation features have been put in place, including:
				 Setbacks to the south of Ragnall Village, including offsets of up to 50 metres from Main Street; The removal of land between North Clifton and South Clifton from the Proposed Development, in order to maintain perceived connectivity between the villages; Bespoke buffers and setbacks to individual properties, informed by home visits and consultation responses.



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				The measures implemented as part of the Proposed Development are intended to reduce physical and mental impacts, but also support community wellbeing by preserving local character, thereby reducing perceived intrusion. While the assessment did not identify significant adverse effects on mental health at the population level, the Applicant recognises the importance of individual experiences and has sought to respond sensitively through both design and engagement.
D2R17	Impact of Human Health including Mental Health [REP2-089]	South Clifton Parish Council	We welcome the ExA questions to the applicant on the impacts to Human Health and Mental Health of this proposed development and in particular how these were assessed. This application is still, and will be, an ongoing worry for our villagers. We feel that the applicant was dismissive of these concerns, especially as no feedback was received to the mental health study conducted by Dr Sarah Armstrong.	The Applicant acknowledges that all development has the potential for adverse effects for certain individuals, particularly in relation to mental health and wellbeing. The Applicant has reviewed in detail the mental health study referenced in the relevant representation made by Dr Sarah Armstrong, including the anonymised quotes and survey findings. The Applicant understands that many of the points raised in both relate to uncertainty around the Scheme and its potential impacts on the visual landscape, noise, vehicle movements and recreational features. In response, the Applicant has sought been maximise community engagement at all stages, enabling local communities to positively influence the design evolution of the Proposed Development and ensure that a number of embedded mitigation measures and enhancement areas have been secured. These include: • Setbacks to the south of Ragnall Village, including offsets of up to 50 metres from Main Street; • The removal of land between North Clifton and South Clifton removed from the Proposed



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				Development to maintain perceived connectivity between the villages; Bespoke buffers and setbacks tailored to individual properties, informed by feedback received during consultation. The Applicant remains committed to working constructively with local communities and stakeholders to ensure that concerns are addressed wherever practicable.
	Cumulative Effect	ots		
D2R18	REP1-074 – Joint Interrelationshi p Report [REP2-085]	Lincolnshire County Council	REP1-074 – Joint Interrelationship Report LCC welcomes the submission of an Interrelationship report. Paragraph 1.1.2 identifies a 16km study area, this report does not appear to provide a justification for this cut off. Notably, Fosse Green Energy has been captured within this 16km search area, the Fosse Green Energy scheme forms part of the clustering of solar sites coming forward around the proposed Navenby substation, others include Springwell and Leoda. This calls into question whether these wider schemes should also fall under consideration for potential cumulative and inter-related effects. There are three NSIP scale solar schemes proposed within Lincolnshire that have been omitted from Figure 1 and Table 1. Kilnside Energy Park, Leoda Solar Farm and Meridian Solar Farm should also be considered within this table. Table 2 identifies predicted construction	Noted. For Deadline 4, the Applicant will prepare a Cumulative Assessment Technical Note considering the closest DCO projects. The assessment will adopt a worst-case scenario approach in terms of overlapping construction timings, taking into account slippages in timeframes for Cottam Solar Project, Gate Burton Energy Park, West Burton Solar Project and Tilbridge Solar Project. This technical note will evaluate the potential cumulative effects of the Proposed Development alongside the nearby solar DCO schemes, ensuring that any combined environmental impacts are identified and appropriately considered. The current proposed long-list, which includes Leoda Solar Farm and Meridian Solar Farm, has been agreed with LCC and NSDC as evidenced at agenda item 10 within the second Issue Specific Hearing (ISH2). It should be noted that Kilnside Energy Park has not been considered as part of the cumulative effects assessment because of its proximity to the Proposed Development (approximately 59km south of the Order Limits).



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			and operational timetables of other NSIP scale solar schemes identified with the 16km area selected by the applicant. Again, as stated above as Fosse Green has been identified, what is the justification for not also considering Leoda and Springwell both of which are in close proximity to Fosse Green. Has consideration been given to potential slippages in the timescales presented within this table? This is deemed particularly pertinent as the predicted construction start date identified for Cottam, Gate Burton and West Burton has already passed and construction has not yet commenced. This slippage in timescale, if leeway has not been built into the consideration of cumulative effects could result in unforeseen negative impacts as a higher number of construction periods could overlap that have not been assessed.	
D2R19	Cumulative Impact [REP2-089]	South Clifton Parish Council	Both WLDC, TPC, and NFU comment on the need for coordinated planning and collaboration between all local developers to minimise the impact should they all be accepted. It appears that the applicant has not engaged with or committed to collaborative working with other projects, therefore, any 'potential opportunities to minimise impacts' will not be identified or achieved. This should be a priority.	As set out in the Joint Interrelationship Report [REP2-074], there are no interrelationships with the nearest projects within the Order Limits. No Order Limits overlap, including the cable corridors to the points of connection, with the exception of the North Humber to High Marnham project, which falls within the Order Limits. Although the High Marnham Substation and the North Humber to High Marnham [EN020034] projects have not yet been submitted, the oCEMP includes a specific commitment to work with National Grid to minimise potential impacts arising from the interaction of the two projects.



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				The Applicant is committed to working collaboratively with other developers to reduce potential cumulative impacts wherever possible and practicable. Details of this approach are set out in the Outline Construction and Environmental Management Plan (oCEMP) (Section 2.12) [REP2-049], which includes measures such as coordinating works to avoid or minimise cumulative effects and participating in any coordination groups led by local or planning authorities. In addition, the Outline Construction Traffic Management Plan (oCTMP) [REP1-055] confirms that, to avoid unnecessary disruption and delays for existing road users, the Applicant will liaise with other major developments in the area to coordinate construction activities and deliveries. Details to ensure the cumulative generation of waste is managed appropriately has been included in oCEMP [REP2-049], oOEMP [REP2-051] and oDEMP [REP2-053]. During operation, the Applicant is committed to ensuring the effective delivery of new habitat creation, the management of existing habitats, and wider biodiversity enhancements through coordination with other projects. This will be facilitated through a Steering Group comprising willing solar developers in the area, host authority ecologists, and conservation organisations such as the Lincolnshire Wildlife Trust and Nottinghamshire Wildlife Trust. The Steering Group will identify opportunities for strategic biodiversity improvements, share lessons on habitat establishment and management, explore potential resource-sharing (for example, the use of a local grazier), and contribute to the wider evidence base on the biodiversity effects of solar farms. This commitment is secured within the Outline



App Ref	Ref	Respondent	Question Summary	Applicant Response
				Landscape and Ecological Management Plan (oLEMP) [REP2-055].
D2R20	9.2 Joint Interrelationshi p Report (Rev 1) [REP1-074] [REP2-091]	West Lindsey District Council	Table 2 of the JIR sets out for other projects details of consenting, construction and operation timetables. However, it is noted that for West Burton, Cottam and Gate Burton, the "predicted start of construction" has passed, in the case of Cottam by nearly 12 months at the time of writing (predicted start Q4 2024), and for West Burton and Gate Burton nearly 9 months at the time of writing (predicted start Q1 2025). Additionally, at the time of writing, WLDC has not yet received any applications to discharge DCO Requirements on those projects. 3 Therefore, the reality is that these projects will indeed have construction periods overlapping with OESF (along with the projects already identified as overlapping). In relation to the point made above about working with the other developers on the JIR, WLDC requests that the Applicant seeks updated information about the other cumulative projects which have been granted a DCO, but which have yet to start in accordance with their predicted programme, and takes this updated information into account in cumulative assessments, including transport.	Noted. As above, for Deadline 4, the Applicant will prepare a Cumulative Assessment Technical Note considering the closest DCO projects. The assessment will adopt a worst-case scenario approach in terms of overlapping construction timings, taking into account slippages in timeframes for Cottam Solar Project, Gate Burton Energy Park, West Burton Solar Project and Tilbridge Solar Project. This technical note will evaluate the potential cumulative effects of the Proposed Development alongside the nearby solar DCO schemes, ensuring that any combined environmental impacts are identified and appropriately considered.



App Ref	Ref	Respondent	Question Summary	Applicant Response			
Land and	and and Soils						
D2R21	EAGWCL-001 & EAGWCL- 007 [REP2-094]	Environment Agency	Issue: Procedure for previously unidentified contamination: • Requirement 21 (2) could still be improved - current procedure in DCO is confusing and may miss a large part of the site • CEMP requires additional detail - proposed process does not include seeking regulatory approval • Procedure in OEMP and DEMP may not be sufficient Impact: Site workers may not follow an appropriate process. Solution: Requirement 21 (2) to be rephrased to incorporate all parts of the Proposed Development, not just that of the area for site investigation. This can be achieved by removal of "in the area for site investigation" and "within such areas". I.e.: "(2) If, during the carrying out of the authorised development in the area for site investigation, contamination not previously identified is found to be present within such area(s), no further development (unless otherwise agreed in writing with the relevant planning authority) must be carried out on the area(s) on which	The Applicant agrees to amend the requirement as requested by the EA, so that sub-paragraph (2) it applies to the whole of the authorised development, and has done this at Deadline 3. With respect to the CEMP, the document includes the requirement that if a remediation strategy is required in respect of any previously unidentified contamination, this will be submitted to and approved by the relevant planning authority. A further clarification has been added that any required remediation strategy should be agreed prior to the commencement of any remedial works (see Table 3.10: Ground Conditions within the CEMP). The requirement for remediation works in the instance of encountering any unexpected contamination within the ground has been added to both the oOEMP [REP2-051], see Table 3.11: Ground Conditions) and the oDEMP [REP2-053], see Table 3.17: Ground Conditions).			



App Ref	Ref	Respondent	Question Summary	Applicant Response
			the contamination has been found until a remediation strategy detailing how such contamination must be dealt with has been submitted to and approved by the relevant planning authority." Request that any contamination assessment report and remediation strategy, as outlined in the oCEMP, be agreed with the relevant planning authority prior to commencement of the remediation works proposed. Copy procedure from CEMP (when updated) to be used in relevant sections of the OEMP and DEMP. In response to our previous comments the applicant was concerned that "additional text sought to be included is purely precautionary". We are now proposing removal of some text, no additional text. The argument that the DCO requirement is "due to the potential for contamination in a specific area of the Order Limits" holds no weight, as unexpected contamination could be encountered anywhere.	
D2R22	EAGWCL-009 [REP2-094]	Environment Agency	Issue: Applicant proposes "It is assumed that all the below ground cables will be left in situ." Elsewhere, cables deeper than 0.9m is specified. Impact:	The Applicant has updated Appendix 7.6, table 3.17 of the Outline Decommissioning Environment Management Plan [EN010159/APP/7.6.3] at Deadline 3 to include removal of cables above 0.9m and below 0.9m expected at this stage to be left in situ.



App Ref	Ref	Respondent	Question Summary	Applicant Response
			Conflicting information. Potential for shallow cables to be left in the ground and cause harm to sensitive receptors after decommissioning. Solution: Suggest this line in Appendix 7.6, Table 3.17 be updated to be consistent with other documents. Additional Comments: We are generally satisfied with the applicant's response to EAGWCL-009, albeit the applicant has not provided a demonstration that cables left in-situ indefinitely would not pose a potentially significant source of contamination to controlled waters. Including consideration for total cable removal at this stage, with reference to legislation at the time of decommissioning, is welcome.	
D2R23	[REP2-094]	Environment Agency	Issue: No response given to this comment in REP1-075 Response to Relevant Reps Impact: This issue is not resolved. Solution: Provide a response. Additional Comments: The referenced document has not been updated. It is unclear if response has been	The Applicant has updated the Outline Export Cable Route Construction Method Statement [EN010159/APP/7.13.1] at Deadline 3 to include the production of this document once detailed design has progressed and the exact nature of the trenchless crossing has been determined.



App Ref	Ref	Respondent	Question Summary	Applicant Response
			provided elsewhere, but the issue is not included in REP1-075. For completeness, the issue was:	
			Issue - The report does not include a commitment to producing a drilling fluid breakout plan to manage risk of 'frac-out'. The production of standalone, site specific frac-out risk assessments and bentonite fluid breakout plans are committed to in the Outline Construction Environmental Management Plan. These should also be referred to in the Outline Export Cable Route Construction Method Statement. No reference is made to the preparation of a Hydrogeological Risk Assessment for watercourse crossings.	
			Impact - If not adequately assessed and managed, loss of drilling fluids could impact controlled waters.	
			Solution - The Applicant should refer to production of Hydrogeological Risk Assessments, frac-out risk assessments and drilling fluid breakout plans in this Method Statement.	
			oCEMP Table 3.5 still mentions "A standalone, site specific frac-out risk assessment", but this section has not been updated since our review.	



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D2R24	[REP2-094]	Environment Agency	Reference to RR63 Volume 2 Chapter 8: Table 8.7 Comments: The applicant's clarification supplied in the Relevant Representations (RR) response is welcomed. The referenced document has not been updated, and it would be beneficial if the submitted documents are updated accordingly for completeness. RR responses might not be referred to during the construction and operational phases and these details may be missed.	Section 8.4.38 of Chapter 8: Land and Soils (EN010159/APP/6.8.1 [APP-037]) has been updated to reflect the information taken from the full datasets relating to groundwater abstractions. This information has also been updated within the groundwater section of Table 8.7.
D2R25.1	REP1-079 Ground Investigation Report [REP2-094]	Environment Agency	The relevant section of the referenced document has not been updated, even though the applicant states that this will be done.	The applicant notes that these updates have not been made. The WFD has been amended for Deadline 3 and Chapter 7 will be amended as part of a wider updated at Deadline 4.
D2R25.2	REP1-079 Ground Investigation Report [REP2-094]	Environment Agency	Issue: Factual report submitted, not interpretative. There is no discussion of ground conditions. There is no assessment of the potential presence of elevated concentrations of contaminants of potential concern in soils or groundwater. No recommendations or conclusions are given. Impact:	We note the comments regarding the scope of the submitted factual report REP1-079]. The purpose of this document at this stage is to present baseline information only. A desk-based assessment of potential contamination risks has been undertaken to support the application [APP-037], and a full interpretative ground investigation with conclusions and recommendations will be carried out post-consent as part of the detailed design stage as required by requirement 21 of the Draft DCO [REP2-009].



App Ref	Ref	Respondent	Question Summary	Applicant Response
			This document cannot be used in isolation to demonstrate the presence or absence of contamination, and associated risks to sensitive receptors. We cannot agree to any land and groundwater contamination measures or conclusions until this work is done and supplied. Solution: Provide an interpretative ground investigation report with conclusions and recommendations as necessary for this site. Additional Comments: The appendix title page is dated July 2025, but the appended report (ref. FAC-01, status Final) is dated 30/01/2025. It is unclear what, if anything, has changed since previous submission. The laboratory test report dates are prior to previous issue. Numerous samples were submitted without a sampling date or were stored beyond maximum holding times before testing (many in excess of 1 month), so are recorded as deviating. Results from these samples cannot be relied upon. We would expect to see comment and discussion of this in any interpretative report. PSL report Contract Number: PSL24/8929, date 06/01/2025 (Client's Reference: 2372986) has testing dates in December 2025. We assume	
			this is user input error.	



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D2R26	Loss of Agricultural BMV land [REP2-089]	South Clifton Parish Council	SCPC are still very concerned about the loss of 53% BMV land and agree with N&SDC that if some of the infrastructures were to remain in place after decommissioning, the loss of this BMV land would be permanent. Natural England (NE) say they "would welcome adjustments to avoid BMV land" and the NFU state "there is a need to strike a balance between food security and climate ambitions. It is important that large scale solar farm development is located on lower quality." We therefore welcome the ExA request to the applicant for a table giving the breakdown of the type of BMV land and an assessment of why that land is being used. (Q13.0.1 + 13.0.2).	All infrastructure except for the cable below 0.9m will be removed during decommissioning as agreed with Natural England, cables below 0.9m will not interfere with agricultural productivity therefore allow for continued activities. Solar farms are considered temporary as the soil resource will still remain available even if the time period was 120 years. The Applicant agrees that a balance between food security and climate ambitions is needed which is why the Applicant has undergone a careful site selection process to avoid impacts on highest quality land. The region of Lincolnshire and Nottinghamshire have significantly high proportions of BMV land compared to the rest of the country. Natural England estimates that around 42% of agricultural land within England is of BMV. The proportion of BMV within Lincolnshire is estimated to be around 71.2%, which is significantly above the national average. The proportion of BMV within Nottinghamshire is calculated to be approximately 49.0%, which is also significantly higher than the national average. The percentage of agricultural land within Lincolnshire was approximately 73.7% of all land area (based on data from 2022). For Nottinghamshire, this percentage was approximately 85%. If all the 'reasonably foreseeable' schemes within Lincolnshire proceed, the change in land use would be 0.26%. The change in land use in Nottinghamshire (for temporary and permanent schemes) would be 0.14%. A change in land use in the range 0.05% to 5.0% is considered to be 'normal'. Therefore, as the change of land use is considered to be within the normal range the cumulative effects of BMV land is not significant.



App Ref	Ref	Respondent	Question Summary	Applicant Response
Flood Ris	k & Drainage			
D2R27	[REP2-094]	Environment Agency	Issue: No commitment for foundation works risks assessment (FWRA) or equivalent, other than comments in Table 3.5 which have not been updated during this review. The proposed piling risk assessment does not include any non-piled foundations. Impact: No assessment of risks posed by non-piled foundations may lead to harm to controlled waters. Solution: Ensure risks to controlled waters from non-piled foundations are specifically considered. This could be within a specific FWRA, or by another method agreed with the EA. Additional Comments: The applicant's response does not fully address our comment. The protocol for previously unrecorded contamination may not be sufficient for foundation works where contamination is likely or has previously been proven by pre-construction site investigation works. The proposed piling risk assessment could be modified to encompass all foundation types.	Although the Applicant has not incorporated a specific Foundation Works Risk Assessment document into the secured requirements for the Proposed Development, the Applicant takes very seriously their responsibility to prevent pollution of the ground or groundwater as a result of nonpiled foundation works. The draft DCO [REP2-009] includes a requirement that if any unexpected contamination is present that is encountered during construction activities, works will be immediately stopped in accordance with the emergency procedures secured in the outline CEMP [REP2-049] and the draft DCO [REP2-009] (reflected by updates to the requirement made at Deadline 3). This will ensure that any further actions relating to the contamination prevent any significant effects on the ground or groundwater environments, with consultation with the local planning authority being a required step within the procedure. The lack of a document specifically entitled 'Foundation Works Risk Assessment' does not mean that these risks have been overlooked, just that actions relating to contamination (known and unexpected) are being dealt with in an alternative manner, which will present the same conclusion, which is that any potential risks as a result of foundation works (piled or non-piled), alongside all other construction activities, will be managed by the pre-construction site investigation, and the emergency response procedure.



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D2R28	EAGWCL-011 [REP2-094]	Environment Agency	In reference to RR 63 Issue: Applicant's response is satisfactory, but all of the relevant documents have not been updated. Impact: Responses given here might not be referred to during the construction and operational phases and these details may be missed. Solution: We recommend that Appendix 7.2, Table 4-1 is updated for completeness and consistency throughout the documents Additional Comments: The applicant's response is satisfactory, but the referenced document has not been updated. It would be beneficial if the submitted documents are updated accordingly for completeness. Appendix 7.2, Table 4-1 has not been updated Appendix 5.9 has been updated but no relevant information has been added (Table 2.1, Work No. 2) Outline Operational Management Plan Table 3.11 has an additional row which includes relevant information as mitigation The Conceptual Drainage Design in REP1-060 7.11.1 Outline Battery Safety Management	Table 4-1 of Appendix 7.2 (i.e. the FRA) will be updated at Deadline 4 to clarify where unlined features could be incorporated. For clarity, unlined features will not be suitable within the BESS/Substation areas but could be included within SuDS features proposed within the solar panel areas (i.e. unlined swales, filter drains and basins/scrapes). Table 2.1, Work No.2 within Document 5.9 (Outline Design Parameters) will be amended as part of a wider update at Deadline 4 to indicate that SuDS features serving the BESS compound will include impermeable lining to prevent infiltration to the ground and also references the use of automatic penstock valves.



App Ref	Ref	Respondent	Question Summary	Applicant Response
			Plan (Rev 2) (Section 5) has been updated - confirmation of impermeable lining is given as 5.1.3	
D2R29	EAGWCL-012 [REP2-094]	Environment Agency	Reference to RR 63 The applicant's response is satisfactory, but the referenced document has not been updated. It would be beneficial if the submitted documents are updated accordingly for completeness. The Conceptual Drainage Design in REP1-060 7.11.1 Outline Battery Safety Management Plan (Rev 2) (Section 5) has been updated. Confirmation of automatic closure of the penstock valve is given as 5.1.2.	Volume 1, Chapter 5: Description of the Proposed Development [EN010159/APP/6.5.1 (v2)] has now been updated at Deadline 3 to make reference to the automatic penstock valve and manual backup operation.
D2R30	Watercourse Crossing Depth [REP2-094]	Environment Agency	Table 3.5, in the watercourse crossing section includes inconsistent minimum depths below the watercourse in comparison to section 5.1.7 of the WFD Assessment. The tracked changes of the CEMP says route will be 2.5m below the bed, but the WFD Assessment still say 1.5m. If depths are not appropriately beneath the bed of the watercourse, then it can increase the risk of contamination in the event of a drilling fluid breakout. Amend the depth in the CEMP or WFD Assessment to ensure they are consistent.	The depths referred to in the WFD Screening Assessment [Latest Reference: EN010159/APP/6.21.1] have been updated for submission at Deadline 3.



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D2R31	Geomorpholog y [REP2-094]	Environment Agency	Issue: C2 - Trenchless Cable crossings Impact: Using only a minimum distance from the watercourse banktop may locate the launch and reception pits (and joint bays) within the active zone of the watercourse. Depending on the geology, the depth of tunnelling below the hard bed of the watercourse may also not be sufficient to minimise fluid breakout. Solution: Depths of drilling/tunnelling and distance of launch/reception pits from watercourse should be determined on a case-by-case basis and possibly require re-siting/micro siting of the crossing locations dependant on the geology and activity of the watercourse. Additional Comments: Recommend site surveys/geotechnical investigations rather than just relying on desk study approach of using geological maps and limited borehole records.	The Applicant agrees that further Ground Investigation will be conducted prior to micro-siting the exact location of the trenchless crossing This in part is why a wider area has been outlined for the crossing location to ensure the scheme retains flexibility to micro site the trenchless crossing to control and minimise the potential environmental impact of the crossing.
D2R32	Concrete [REP2-094]	Environment Agency	It is suggested that the substations and associated structures will have concrete slab foundations. However, there are currently no mitigations for this seen in the Outline Construction Environmental Management Plan (oCEMP).	A specific section covering concrete has been added to Table 3.5 of the oCEMP and is reiterated in the updated WFD Screening Assessment [Latest Reference: EN010159/APP/6.21.1], both submitted at Deadline 3.



App Ref	Ref	Respondent	Question Summary	Applicant Response
			Concrete can be a risk to water quality as it is a known source of hazardous substances, particularly during the curing phase. The CEMP should be developed to ensure that risks of pollution as a result of concrete are adequately managed. Further details which could be included in the CEMP and WFD Assessment: • Identify all areas where concrete works are proposed • Specify whether any of these will be cast in situ or precast and delivered • For in situ concrete pours, suggest timing, weather conditions, and runoff control. (These construction works should be minimised during heavy precipitation events and carried out during dry months where practicable.) • Describe containment measures for concrete washout (e.g. lined washout pits, bunded areas) Section 5.1.6 of the WFD Assessment does say "Particular care will be taken with the delivery and use of concrete and cement as it is highly corrosive and alkaline", but further details are required.	
D2R33	Wash Out Water [REP2-094]	Environment Agency	Issue: Section 5.1.4 of the WFD Assessment says that "equipment and plant are to be washed out and cleaned in designated areas within the compound, where runoff can be isolated for treatment before disposal", and section 5.1.6	A specific paragraph covering wash down has been added to Table 3.5 of the oCEMP and is reiterated in the updated WFD Screening Assessment [Latest Reference: EN010159/APP/6.21.1], both submitted at Deadline 3.



App Ref	Ref	Respondent	Question Summary	Applicant Response
			says that "wash water will be prevented from passing untreated into watercourses" however it is unclear how wash out water will be retained and treated.	
			Impact: If wash water is not managed correctly, it can enter surface watercourses and then it has the potential to decrease water quality due to any contamination and sediment that may be present.	
			Solution: We recommend further mitigation measures to explain how vehicle wash out / wheel cleaning facilities will be managed are added to the WFD Assessment and the CEMP.	
			Additional Comments: Mitigation measures associated with vehicle wash out and wheel washing facilities could include:	
			 Ensure these activities will be undertaken within a designated impermeable or lined area and should not be allowed to discharge into a watercourse or infiltrate to groundwater. Sediment management measures (i.e. silt fencing) could be considered around the wheel washing. Any SuDS incorporated around wheel washing facilities should provide sufficient treatment for suspended solids, metals and 	



App Ref	Ref	Respondent	Question Summary	Applicant Response
			hydrocarbons. The site of these washdown and wheel washing facilities should be a minimum of 10m from top of bank of watercourses. If road transport is required to remove wash water to an offsite disposal facility then there should be regard for this within the waste management procedures.	
D2R34	PFAS in PV Modules [REP2-094]	Environment Agency	Issue: Solar PV Modules are described as being bifacial with "PV cells and toughened glass on both the upper and lower surface." It would be good to clarify that there is no PFAS in the materials or in any coating applied to the panels. Impact: PFAS are 'forever chemicals' that will negatively affect water quality. Risk from PFAS can be increased during washing to keep them clean, for maximum efficiency of energy generation. Solution: Check with panel manufacturers if the	The module manufacturer has not been selected at this stage, and therefore, no details of the module contains PFAS chemicals or not can be provided. The industry generally is moving away from PFAS chemicals within the production of modules, in particular one source was the plastic back sheet which is not present in a glass/glass bifacial module. Diligent maintenance of modules will ensure that any chemicals contained within the module are not released into the environment. This is in part why the DCO contains the right to replace damaged modules throughout the lifetime of the scheme.
D2R35	Septic Tank [REP2-094]	Environment Agency	materials used have any PFAS risk. Issue: It is suggested that "waste water associated with welfare facilities will be contained in a septic tank", however no provision of applying for an environmental permit in relation to foul water can be seen.	It is proposed that septic tanks/cess pits will be provided during construction, operation and decommissioning. These tanks/pits will be emptied and tankered away at intervals that will be confirmed at detailed design. Severn Trent Water have been consulted and have confirmed in principle that they would accept tankered flows from the Proposed



App Ref	Ref	Respondent	Question Summary	Applicant Response
			Impact: There is a requirement to ensure that foul water treatment and disposal is adequate to minimise risk to water quality. If not managed correctly it can greatly increase the about of nutrients, and other contamination, in receiving watercourses. Solution: Foul water disposal strategy during all phases, construction, operation and decommission should be clarified. Permits for septic tanks should be applied for if it is determined that one is required. We also recommend that any foul water strategy is included in Chapter 7: Hydrology and Hydrogeology, as currently the only information associated with this is that there will be "no direct connection to existing foul infrastructure.". Additional Comments: If treatment and discharge at the site is required, you should consider any potential impacts of this discharge and confirm that a water discharge activity permit will be sought. If septic tanks are used this will still need to be assessed. Given the timeframe to determine environmental permits we encourage applicants to engage with us on permit requirements at the earliest possible stage. Septic tanks and sewage treatment plants: what you need to do: Apply for a permit -	Development, subject to confirmation of volumes and intervals of tankering at detailed design. This will be a closed system and there would be no foul discharge or treated discharge to ground or surrounding watercourses. It is not anticipated therefore that an environmental permit would be required from the EA. Road transport to an offsite disposal facility will be required and this has already been considered in the Outline Site Waste Management Plan [APP-184] which indicates: "Sewage from the site offices/ compounds will drain to septic tank and be collected by a suitable specialist waste contractor"



App Ref	Ref	Respondent	Question Summary	Applicant Response
			GOV.UK If road transport to an offsite disposal facility is required to remove foul water from the septic tanks via a tanker, then there should be regard for this within the waste management procedures	
D2R36	Substation SuDS [REP2-094]	Environment Agency	It is unclear if the substations will have their own area lined with impermeable membrane, like each BESS area, to contain any contaminants that could be mobilised in the event of a fire. In sections 5.4.42 – 5.4.46 associated with Work Area No. 3: Substations there is no mention of any lined areas or SuDS containment areas to prevent surface water reaching watercourses or infiltrating into groundwater under the Substation area. Therefore, the drainage arrangements do not appear to be adequate in the event of a substation fire, especially if they contain transformers that rely on oil as a cooling and insulating medium. Impact: In the event of a fire, depending on the type of transformers used and methods to put out the fire, substations can pose an unacceptable risk to the water environment receptors and will deteriorate water quality unless it is contained sufficiently. Solution:	he substation areas will be treated in the same way as the BESS compound, with the inclusion of impermeable lining beneath the compound and any associated SuDS features. Furthermore, runoff from the substation area will be directed to the same detention basin that manages runoff from the BESS compound which includes the automatic penstock valve. Chapter 5: Description of the Proposed Development [EN010159/APP/6.5.1 (v2)] has now been updated to make reference to the above. Chapter 7: Hydrology and Hydrogeology will be updated for Deadline 4. Within the substations, the transformers will be mounted within a bunded area that includes a water separation filter. This bunded area is typically large enough in volume to contain at least 110% of the volume of oil that is contained within the transformers. This and the measures outlined above (i.e. impermeable lining and penstock valves) are considered appropriate measures to contain potentially contaminated runoff.



App Ref	Ref	Respondent	Question Summary	Applicant Response
			The substations designs need to include provisions for preventing contamination to water quality in the event of a fire Additional Comments: If the substations do contain oil transformer, in the event of a fire, there would be a pathway for contamination to get into surface water runoff. In Appendix 7.4: Stage 1 Water Framework Directive Screening Assessment, section 4.1.3 says that "It is proposed that the drainage system and SuDS features servicing the BESS and Substation areas will be impermeably lined", however this is not clear in Chapter 5 and Chapter 7 of the Environment Statements.	
D2R37	Water Quality Monitoring [REP2-094]	Environment Agency	Issue: Section 5.1.6 of the WFD Assessment says that "Water quality monitoring of potentially impacted watercourse will be undertaken to ensure that pollution events can be detected against baseline conditions and dealt with effectively". However further details of a water quality monitoring plan are requested. Impact: If a monitoring plan is not suitably designed then it may not be able to detect relevant trends, if any, on water quality during the construction and operation phases. Solution:	Further information is now included within the WFD Screening Assessment [Latest Reference: EN010159/APP/6.21.1], setting out the anticipated water quality monitoring needs. This however, will need to be agreed as part of the production of the CEMP, to be approved by the LPA, in consultation with the EA. With regards to the Water Management Plan, it is intended that this be produced at detailed design as part of the management plans.



App Ref	Ref	Respondent	Question Summary	Applicant Response
			The monitoring plan should reflect locational variation in the site. For example, monitoring upstream and downstream of any proposed water discharges or water crossings. Ideally the monitoring plan will include enough monitoring samples to detect any seasonal variation. Additional Comments: We recognise that section 5.2 of the WFD Assessment says that the Water Management Plan (WMP), which will be submitted as part of the CEMP, will contain details of pre, during and postconstruction water quality monitoring. However, we have not yet been able to review the WMP.	
D2R38	HDD Breakout Plan [REP2-094	Environment Agency	Issue: Section 5.1.6 of the WFD Assessment says that a "site specific frac-out risk assessment will be produced prior to drilling the cable crossings", however section 5.1.7 suggests there will be a "bentonite fluid breakout plan" in the CEMP. Impact: HDD, or other trenchless installation methods, could impact the water quality of the water environment if not sufficiently managed. Solution: We still need to be able to review a bentonite fluid breakout plan, and would recommend	The following text has been added to the oCEMP at Deadline 3: "A site specific frac-out risk assessment will be produced and included in the CEMP prior to drilling the cable crossings, as is standard practice, to mitigate any water quality deterioration from the drilling process. The CEMP will also include a bentonite fluid breakout plan and an emergency spill response procedure." The frac-out risk assessment and bentonite fluid breakout plan are separate documents with the first assessing the potential for hydraulic fracture to occur and any mitigation required to minimise this potential. The latter document will set out how fluid breakout would be managed/responded to should it occur.



App Ref	Ref	Respondent	Question Summary	Applicant Response
			using consistent language of assessments and plans to avoid confusion with what mitigation measures are being implemented.	With regards to the Bentonite Fluid Breakout Plan and Water Management Plan, it is intended that these be produced at detailed design as part of the management plans.
D2R39	Storage of Fuel, Oil & Chemicals [REP2-094]	Environment Agency	Table 3.5 of the CEMP and DEMP in the Spillage Risk topics and Section 5.1.3 of the WFD Assessment discusses certain measures for the storage of materials, such as fuel, oil and chemicals, however, further measures should be included in the WFD Assessment and the CEMP. If refuelling and storage of fuels, oils and chemicals is not suitably managed then there is an increased risk of pollutants entering the water environment and decreasing the water quality. Further mitigation measures should be clarified/added to the CEMP, DEMP and WFD Assessment. Mitigation measures should include: • Ensure that all refuelling areas and storage areas for fuel, oil and chemicals are at least 10m away from the top of bank from watercourses. • All storage for fuel, oil and chemicals should be covered, where possible to prevent accumulation of rainwater. Where coverage is not adequate in heavy rainfall, the bunds may	Further measures to mitigate spillage risk and their impacts have been included under heading "Storage of Materials" within Table 3.5 of the oCEMP and oDEMP and is reiterated in the updated WFD Screening Assessment.



App Ref	Ref	Respondent	Question Summary	Applicant Response
			benefit from a valve to release any accumulated rainwater. • Where fuel and oil are stored in these bunded areas on impermeable surfaces, an oil separator (interceptor), or other device to remove oil from water, may need to be installed. • The CEMP should include the same details as the WFD Assessment, such as bunded areas will have a minimum capacity of 110% of the capacity of the containers.	
D2R40	Foul Water Strategy/Surfac e Runoff Disposal [REP2-094]	Environment Agency	Issue: There is unclear detail about the foul water strategy during the construction phase. It is assumed to be portable welfare units in line with operation, but this is unclear. Table 3.5 of the CEMP has contradicting information about the disposal of site runoff and any associated foul water connection. Impact: It is hard to assess the foul water drainage strategy without the connectivity options and be confident it has been adequately provisioned during all phases. Solution: Provide further information about which points of connections are being considered (if any), and what welfare facilities are being provided during construction.	It is proposed that septic tanks/cess pits will be provided during construction, operation and decommissioning. These tanks/pits will be emptied and tankered away at intervals that will be confirmed at detailed design. Severn Trent Water have been consulted and have confirmed in principle that they would accept tankered flows from the Proposed Development, subject to confirmation of volumes and intervals of tankering at detailed design. The oCEMP has been updated at Deadline 3 to remove any inconsistency on this and confirms the above.



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			Additional Comments: Table 3.5 lists three different options for disposing of construction site run off. • If "treated on site and discharged under a Water Discharge Activity Permit" is being consider then given the timeframe to determine environmental permits we encourage applicants to engage with us on permit requirements at the earliest possible stage. Guidance in relation to discharging and permits is available at the following links: Discharges to surface water and groundwater: environmental permits - GOV.UK Get advice before you apply for an environmental permit - GOV.UK • Further information in Table 3.5 says "Site drainage, including surface runoff and dewatering effluents, will be discharged to sewers". However, if disposal to a public sewer for surface water drainage, then it remains unclear why any foul water also isn't being	
			connected to a sewer. This is also in contradiction of Chapter 7 of the Environment Statements which said that "there will be no direct connection to existing foul infrastructure".	
			If foul water and surface water runoff from site are both being removed from site to an appropriate and licensed waste facility, then the other disposal strategies do not need to be	



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			included in Table 3.5. If road transport to an offsite disposal facility is required to remove foul water from portable welfare units or surface water runoff, then there should be regard for this within the waste management procedures. Our information about portable welfare units is obtained from the OEMP which states in section 2.10.1 that "During operation selfcontained portable welfare units which store foul/wastewater for collection/emptying by specialist licenced contractors", however this information is not present in the CEMP or in Chapter 7 of the Environmental Statement.	
	Fire Safety			
D2R42	EAGWCL-013 [REP2-094]	Environment Agency	EAGWCL-013 Volume 3 Appendix 7.11 Outline Battery Safety Management Plan The relevant section of the referenced document has not been updated, even though the applicant states that this will be done.	The oBSMP [EN010159/APP/7.11.2] has now been updated at Deadline 3.
D2R43	EASW-001 [REP2-094]	Environment Agency	Section 4.8 on the Post-incident Recovery and End of Life Management should make reference to how any containment basins/SuDS will be cleaned prior to penstock re-opening and allowing drainage.	The Applicant has updated the oBSMP at Deadline 3 [EN010159/APP/7.11.2] to reflect the EA's comment, outlining that the cleaning of any substrate would form part of the post-incident recovery plan.



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			In the event of a fire affecting the BESS, there is the potential for pollutants to attach to surface in the lined areas and these could be re-mobilised in surface water runoff and end up in the water environment unless the containment areas are managed after an event. After an incident, the containment area would need to be thoroughly cleaned before any valves were reopened and drainage can resume. Therefore, we would also advise against gravel substrates used in the BESS and Substation drainage systems.	
Communit	y Engagement			
D2R44	Impact on Residents and Community Benefit [REP2-089]	South Clifton Parish Council	The documentation sent out by the applicant during the consultation process (Community update April 2024) promised a community fund every three months. To date there has been two community funds instead of six (April 2024 – July 2025), both limited to 10 applications with a maximum of £1000 each. This is far less that the funds set up by other local NSIP developers. We welcome the ExA question (1.0.20) asking for more detail about the community fund as the applicant has provided little explanation to us or other agencies	The Applicant announced that there would be an initial community benefit fund that would be available during the preapplication and examination period. This is very unusual, as most community benefits are contingent on the project being consented, but the Applicant opted to offer an initial smaller fund as an offer of good will and commitment to the community. As has been clear in consultation materials [APP-152 and APP-158], the Applicant is committed to a larger community benefit fund that would be available if the project is consented. The initial fund was established to be £10,000 per year for five years, up until the consent decision is made. While an early document proposed that this fund would be made available quarterly, due to high levels of interest, the full annual funding was allocated in the first round in spring



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				2024. The second round of funding was announced in Spring 2025, and the allocations will be decided shortly.
Landscap	e and Visual			
D2R45	Impact on Residents and Community Benefit [REP2-089]	South Clifton Parish Council	We are pleased that the ExA have requested detailed information about the Residential Receptors from the applicant (Q1.0.11), with a clear plan of the affected properties and evidence of each individual assessment in respect of landscape/amenity or health terms. SCPC in discussion with some of the affected residents on the east side of the river Trent, agree with them that the applicant was not thorough or understanding in its dealings with these villagers.	The information regarding the consideration of residential receptors, both in respect to the design of the Proposed Development and the assessment of visual impacts, was provided as an appendix to the Written Summary of the Applicant's Oral Submissions and the Issue Specific Hearing 1 Part 1 and Part 2 (REP1-077 and REP1-098). This information sets out how these considerations were informed by field work and visits to residential properties throughout the pre-application phase and is supported by a series of plans that show how key views from each property were taken into account through the design process.
Socio-eco	onomic			
D2R46	Impact on Residents and Community Benefit [REP2-089]	South Clifton Parish Council	TPC stated that these developments "offer absolutely nothing to the local community to mitigate their concerns. They could actually take jobs away from locals who work in agriculture, turf, horses and sugar. This risks adding to the problem of rural poverty rather than offering increased employment opportunities." SCPC absolutely agree with this statement and have seen nothing from the applicant that would change that.	As set out in Environmental Statement (ES) Chapter 17 – Socio-Economics [APP-046], the number of jobs created by the construction of the Project, across the two-year construction period is substantial (554, with a peak of 750). These will include employment opportunities in a range of trades and skill levels. During operation, the Project is expected to generate 15 direct Full Time Equivalent (FTE) jobs. A survey of all landowners within the Order Limits Boundary (OLB) determined there are currently around 20 agricultural jobs (equating to 7.75 FTE) within the OLB; thus, the net change would be an increase of 7.25 direct FTE jobs. Further detail on the types of jobs (such as skill levels, trades and the precise timing of employment demand over the



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				construction period etc) is not currently available. Once a contractor has been appointed, additional detail can be provided to stakeholders. However, as noted below several relevant actions to maximise local benefits will be developed and set out in the final Skills, Supply Chain and Employment Plan (SSCEP). Currently this has been developed in outline (the Outline SSCEP [REP2-057]). This acknowledges the importance of collaboration between the Applicant and local communities, to maximise the employment and upskilling opportunities generated by the Project within the local area and districts. It identifies the key stakeholders for the Applicant to collaborate with (public sector partners, education and training providers and business sector groups) and proposes a number of actions to effectively promote opportunities for local people and businesses. These actions include: • Ensuring effective communication of opportunities (e.g. through forums, liaison with other NSIPs, attending job/career fairs) • Understanding intervention needs, such as specific education/training requirements, and working with stakeholders to support the development of relevant programmes (e.g. apprenticeships) • Delivering other supportive activities, such as volunteer placements, work shadowing and visiting local schools These initial actions have been developed through engagement with relevant stakeholders and will continue throughout the development of the final SSCEP. A working group will be set up to galvanise interest and maximise contributions as early as possible, and to ultimately ensure as much specific detail as possible is provided in the final Plan. The working group will also oversee systems for



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	Ref	Respondent	Question Summary	monitoring and recording the outcomes of the measures, and incorporating lessons learned to update the plan over time. Whilst the majority of the specific matters proposed form part of the outline SSCEP, additional matters outlined below – several of which have been raised by other stakeholders as part of the examination process - will be considered and discussed as part of the further development of the SCCEP: • Adoption of a CITB National Skills Academy for Construction (NSAfC) Client-Based Approach1 to the final SSCEP, with: Local inclusive employment, especially among NEETs, people with disabilities, and other priority groups; apprenticeship starts and completions across technical and professional sectors; Industry-recognised qualifications NEBOSH, CMI/ILM, BTEC's etc; Training partnerships with Jobcentre Plus and local education and training providers. • Recommendation for the final SSCEP to include targets for local recruitment and skills development, both during construction and operation; commitments to apprenticeship starts and completions, including structured pathways for progression to higher-level qualifications;
				 Engagement with local education providers to codesign relevant training and ensure pipeline continuity; monitoring and reporting mechanisms to ensure transparent delivery against key performance indicators (KPIs). Regular collaboration with the host local authorities to adapt the ESP to changing economic conditions or emerging skills needs.



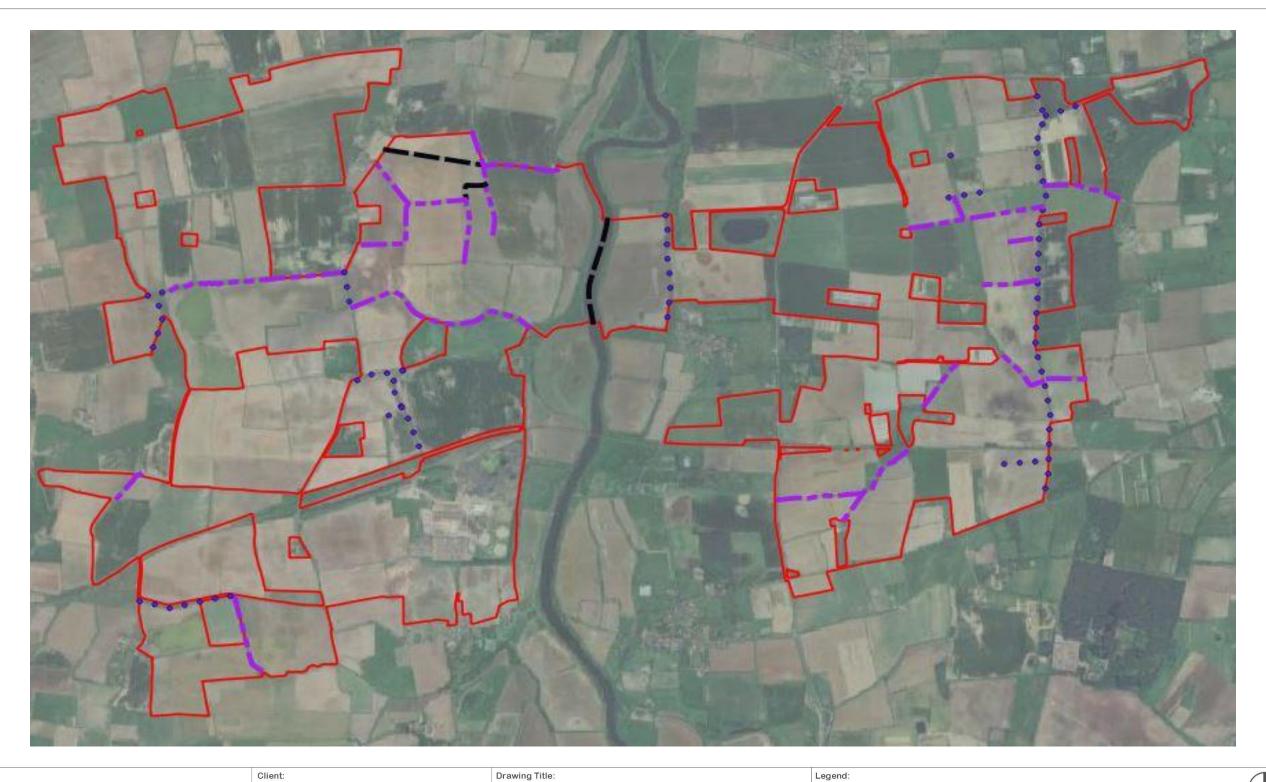
App Ref	Ref	Respondent	Question Summary	Applicant Response
Noise and	Vibration			 Regular monitoring and reporting of progress (quarterly is suggested) against the ESP to accommodate multi-authority oversight (with potential for provision of a monitoring and support fee payable to the Council if this is agreed to be appropriate). During the pre-application period, the Applicant also established a small benefit fund to support local initiatives in advance of the application decision, and has committed to a large community benefit fund if the project is consented.
Troise area	Tibration.			
D2R47	Impact of Human Health including Mental Health [REP2-089]	South Clifton Parish Council	We would point out that, even now, we are still unaware of where the inverters, BESS and substations are to be sited and this is affecting the mental health of many residents. The noise associated with these structures has been proved to be noticeable (at the least) and the applicants' unwillingness to inform us of the final detailed plan has not helped mitigate these considerable concerns. We ask that this is remedied as soon as possible.	Updates to the Outline Design Parameters have been submitted by the Applicant at Deadlines 1 and 2, in part to clarify the minimum distances between items of plant and residential receptors [REP1-022 and REP2-023]. To be clear on the distances from residential properties and noise restrictions that are included in the Application for the Proposed Development: • The BESS equipment will be located at a distance of at least 300m from residential properties. • The substation equipment will be located at a distance of at least 300m from residential properties. • Where practicable, PCS units (which include inverters) will not be located within 100m of residential properties and will not be located within 50m of PRoW.



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				In all cases, this equipment will be designed to ensure that noise rating levels experienced at night at residential receptors does not exceed 35dB(A), regardless of distance from the receptor.
				With regard to the operational noise limit referenced above, this is controlled by Requirement 16 of the draft DCO, the latest version of which was submitted at Deadline 2 [REP2-010], although with no changes to Requirement 16 from previous versions of the draft DCO. Requirement 16 requires that the applicant submit an operational noise assessment to the relevant planning authority for approval prior to commencement of the relevant Works Nos. The Applicant will therefore be required to demonstrate that operational noise levels meet the appropriate limit, to the satisfaction of the relevant planning authority, prior to works commencing. This should provide comfort to nearby residents that wherever these components are placed within the areas identified inside the Order Limits, they will be required to meet these noise limits.



Appendix A Ditch Condition





Onone.	Drawing rido.	
One Earth Solar Farm Ltd	Baseline Watercourse Conditions	
Project:	1	
One Earth Solar Farm	Drawing Number:	Rev:
	Internal Ref 11	01
Planning Inspectorate Scheme Ref:EN010159	Drawn Date:	-
Environmental Statement Volume 2	2025-09-09	

