# Meridian Solar Farm

EN010169

**Volume 5**

**Consultation**

**5.1 Appendix H: Section 42 Applicant's Responses**

APFP Regulation 5(2)(q)

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

**March 2026**

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# 1. Introduction

## 1.1. Section 42 Stage Two Consultation

1.1.1. The Applicant received 31 responses during Stage Two consultation in accordance with Section 42(1)(a) and Section 42(1)(b) of the PA2008, and 26 responses under Section 42(1)(d).

1.1.2. Section 2 of this appendix presents the Applicants' response to the feedback received.

# 2. Appendix H-1.1 Section 42 Consultee Applicant's Response Table

## 2.1. Active Travel England

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
|---|---|---|---|
| Active Travel England | In relation to the above planning consultation and based on the information available, Active Travel England does not wish to make any comments at this time. The views of the local highway authority should be appropriately considered prior to determining this application. | N | Consultation and engagement with the local highway authority has been undertaken in relation to the DCO Application. This consultation and engagement with local highway authorities will continue following the submission of the DCO Application to consider their views regarding the Scheme. |

## 2.2. Anglian Water Services Ltd

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
|---|---|---|---|
| Anglian Water Services Ltd | We have investigated the attached "Scheme Development Area Boundary" from an above ground assets and formal easement perspective only.<br><br>Following, I can see a portion of our client freehold site, under the Title Number LL255158 is located within the scheme boundary. I can also see our clients formal right of way in relation to their water site, held under Title Numbers LL252420 and LL18190, is affected.<br><br>Please note we have not checked for below ground apparatus not laid under formal easement. Instead, spatial Information regarding Anglian Water's underground apparatus is available via DigDat (https://utilities.digdat.co.uk/Account/) | N | Consultation and engagement with AWS has been undertaken in relation to the DCO Application. This consultation and engagement with AWS will continue following the submission of the DCO Application. The Applicant anticipates being able to negotiate and agree on appropriate protective provisions with AWS to protect AWS's apparatus and statutory functions, and to regulate the exercise of DCO powers so as to minimise interference with the operation and maintenance of existing utilities. |
| Anglian Water Services Ltd | AWS works to support the construction and operation of national infrastructure projects that are conducted in accordance with the Water Industry Act 1991. AWS works with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers, wastewater and water supply infrastructure are planned to be undertaken with the minimum of disruption to the project and customers.<br><br>We would encourage ongoing engagement to ensure that AWS and the Applicant have reached agreement on the approach to assets and connections in order that these matters are not drawn out during the Examination stage. | N | Consultation and engagement with AWS has been undertaken in relation to the DCO Application. This consultation and engagement with AWS will continue following the submission of the DCO Application. The Applicant anticipates being able to negotiate and agree appropriate protective provisions with AWS to protect AWS's apparatus and statutory functions, and to regulate the exercise of DCO powers so as to minimise interference with the operation and maintenance of existing utilities. |
| Anglian Water Services Ltd | We would expect the Environmental Statement (ES) to include reference to any existing infrastructure managed by AWS and the provision of replacement infrastructure. Reference is made in the PEIR Volume 1 Chapter 14: Other Environmental Topics on the risks of utilities failure through a Major Accidents and Disasters Assessment including in Tables 14-6-3; 14-6-4; and 14-6-5 as set out below:<br><br>*"Risk in relation to utilities failure will be designed out of the Scheme. Constraints within the Site will be identified by a desk-based assessment to be appended to the ES, with infrastructure within the Scheme micro-sited away from utilities… Further details will be included within the ES."* | N | The Scheme has been designed to minimise disruption to existing utilities. Protective provisions are included within the **Draft DCO** (Doc Ref. 3.1). The Scheme is not expected to directly interact with existing AWS infrastructure. This has been identified through desk-based assessment and engagement with AWS. Where practicable, infrastructure has been micro-sited to avoid existing utilities. At detailed design, where interaction cannot be avoided, appropriate measures will be secured to protect existing apparatus and maintain AWS's statutory undertaking.<br><br>In addition, protective provisions are included within the **draft DCO** (Doc Ref. 3.1) for statutory undertakers whose assets may be affected. The Applicant is engaging with AWS and anticipates agreeing bespoke protective provisions, where necessary, to ensure the protection of AWS's assets and regulate the exercise of DCO powers. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Anglian Water Services Ltd | There are existing AWS assets including water mains within the project area such as within the highway or its verges which link to the various settlements. Water abstraction locations may also be within the project area. In addition, AWS has sewerage assets (drainage networks and above ground facilities including pumping stations and water recycling centres/ sewage treatment works), connected to these are pipe connections to the corresponding settlements, including sewers and rising mains which can be in areas beyond the highway verges. This also needs to be factored in terms of the potential access points, route options and key junctions (transport and access plans in PEIR Volume 1 Chapter 13: Traffic Access). | N | The Scheme has been designed to minimise disruption to existing utilities, including in the development of access points, construction routes, and junctions. Consultation and engagement with AWS will continue following the submission of the DCO Application. The Applicant anticipates being able to negotiate and agree appropriate protective provisions with AWS to protect AWS's apparatus and statutory functions, and to regulate the exercise of DCO powers so as to minimise interference with the operation and maintenance of existing utilities. |
| Anglian Water Services Ltd | Within the red line boundary, there are two water recycling centres (sewage treatment works) known as Cowbit WRC and Moulton WRC located near to the villages of Moulton Chapel and Moulton as well as a water storage site at Weston, with pipe connections to these settlements.<br><br>There will also be planned new/ upgraded asset investments to be delivered in our Business Plan in the AMP8 period of 2025 – 2030 (and potentially beyond this date) which need to be considered. These may not all be covered in the PEIR Volume 1 Chapter 15: Cumulative Effects; Appendix 15-1: Long List of Other Developments; and Appendix 15-2: Short List of Other Developments. | N | The long and short list of developments considered in the cumulative assessment are presented in **ES Appendix 4-1: List of Cumulative Schemes** (Doc Ref. 6.1). The upgrades to Cowbit and Moulton WRC are not included within ES Appendix 4-1 as no information is available in the public domain meaning the cumulative effects with the Scheme cannot be assessed.<br><br>The Applicant is open to engaging with Anglian Water further on the integration of such works as Anglian Water develops these proposals further.<br><br>The Applicant anticipates being able to negotiate and agree appropriate protective provisions with AWS to protect AWS's apparatus and statutory functions, and to regulate the exercise of DCO powers so as to minimise interference with the operation and maintenance of existing utilities. |
| Anglian Water Services Ltd | One of AWS's four environmental pillars is to tackle climate change as through project design we have reduced capital (embedded) carbon emissions by 63% and AWS is on track to achieve net zero operational emissions by 2030, partly through the companies own renewable energy generation of some 40% of our energy consumption. Our target is to reduce capital carbon by 70% by 2030 and this is one of our drivers to minimise the impact of other projects on AWS assets. | N | The Scheme has been designed to minimise the need for utility diversion and/or protection works, thereby reducing additional GHG emissions.<br><br>Consultation and engagement with AWS has been undertaken in relation to the DCO Application. This consultation and engagement with AWS will continue following the submission of the DCO Application. The Applicant anticipates being able to negotiate and agree appropriate protective provisions with AWS to protect AWS's apparatus and statutory functions, and to regulate the exercise of DCO powers so as to minimise interference with the operation and maintenance of existing utilities. |
| Anglian Water Services Ltd | With reference to PEIR Volume I Chapter 5: Climate Change, the design of the project should seek to avoid such conflicts and minimise the need for asset diversion and protection works which generate greenhouse gases (GHG). | N | The Scheme has been designed to minimise disruption to existing utilities, including in the development of access points, construction routes, and junctions. Consultation and engagement with AWS will continue following the submission of the DCO Application. The |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | AWS would want to ensure the location and nature of these assets is identified and protected. To reduce the need for diversions and the attendant carbon impacts of those works, ground investigation would enable the promoter to design out these potential impacts and so also reduce the potential impact on services if construction works cause a pipe burst or damage to all supporting infrastructure.<br><br>Utilities searches should, therefore, be undertaken to establish the extent of AWS's assets within the scheme's application boundary. These should be mapped to establish interactions with assets and the scheme designed to avoid impacts upon those assets.<br><br>Maps of our assets are available to view at the following link: http://www.digdat.co.uk/<br><br>For land investigation questionnaires relating to AWS's existing above ground assets and formal easements, you should contact the Estates Team on: awsestates@savills.com | | Applicant anticipates being able to negotiate and agree appropriate protective provisions with AWS to protect AWS's apparatus and statutory functions, and to regulate the exercise of DCO powers so as to minimise interference with the operation and maintenance of existing utilities. |
| Anglian Water Services Ltd | The Meridian project's utilities team should engage with AWS to consider design changes to reduce asset interactions and then agree design options for the diversion and protection of assets. This will include above ground assets and land interests as well as future projects which could have cumulative impacts. It is for the project to identify, assess and design out interactions with utility assets and to seek to reduce the impacts of construction and operation of the project. AWS's preference is to work with the Applicant during the pre-application phase to reach agreement on design changes, mitigation and protection measures in the application prior to submission. We would welcome on-going engagement to ensure that AWS and the Applicant have reached agreement on the approach to assets and connections in order that these matters are not drawn out during the Examination.<br><br>Our National Infrastructure team can assist in identifying assets in relation to the Development Consent Order (DCO) process. This engagement typically includes:<br>• Clash detection and resolution<br>• Early design and technical assurance<br>• Asset protection and diversion planning<br>• Coordination with AWS investment schemes (current and planned)<br>• Review of red line boundary implications. | N | Consultation and engagement with AWS has been undertaken in relation to the DCO Application. This consultation and engagement with AWS will continue following the submission of the DCO Application. The Applicant anticipates being able to negotiate and agree appropriate protective provisions with AWS to protect AWS's apparatus and statutory functions, and to regulate the exercise of DCO powers so as to minimise interference with the operation and maintenance of existing utilities. |
| Anglian Water Services Ltd | Sharing data - via a Shapefile format - enables timely clash detection and coordination. There is an initial chargeable cost to cover a high-level desktop assessment of each interface between the NSIP and AWS assets or projects, but this can depend on project size, complexity and requirement from the NSIP. Additional costs will be charged as further scope, design, and construction activities are agreed.<br><br>We strongly recommend that a clash detection and asset assessment be undertaken. This ensures clarity, reduces risk, and supports the timely and efficient delivery of your project. | N | Consultation and engagement with AWS has been undertaken in relation to the DCO Application. This consultation and engagement with AWS will continue following the submission of the DCO Application to consider their views regarding the Scheme including their recommendation for a clash detection and asset assessment to be undertaken. |

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| Anglian Water Services Ltd | Reference is made in the PEIR to the use of both trenches and trenchless work methods for installation of cables. AWS requires the following standoff distances are applied for working each side of the medial line of pipes. This information is taken from our Protective Provisions template which will need to be agreed with AWS for the DCO submission:<br>• 4 metres where the diameter of the pipe is less than 250 millimetres;<br>• 5 metres where the diameter of the pipe is between 250 and 400 millimetres<br>• A distance to be agreed on a case-by-case basis and before the submission of the plan under sub-paragraph (1) is submitted where the diameter of the of the pipe exceeds 400 millimetres.<br>I attach our template provisions for legal teams' inclusion in a draft DCO and for progression and agreement of the draft DCO before submission of the Meridian NSIP application. | N | Consultation and engagement with AWS has been undertaken in relation to the DCO Application. This consultation and engagement with AWS will continue following the submission of the DCO Application. The Applicant anticipates being able to negotiate and agree appropriate protective provisions with AWS to protect AWS's apparatus and statutory functions, and to regulate the exercise of DCO powers so as to minimise interference with the operation and maintenance of existing utilities. The Applicant is currently negotiating Protective Provisions to cover interactions between the Scheme and AWS assets. These will be added to Schedule 13 of the **Draft Development Consent Order** (Doc Ref. 3.1). |
| Anglian Water Services Ltd | We welcome the intention to produce a CEMP (PEIR Volume 1 Chapter 14: Other Environmental Topics). This should include steps to remove the risk of damage to AWS IEA1 assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings. Further advice on minimising and then relocating (where feasible) AWS existing assets will need to be further assessed, as set out above. | N | The Scheme has been designed to minimise disruption to existing utilities. Protective provisions are included within the **Draft DCO** (Doc Ref. 3.1) for statutory undertakers whose assets may be affected. In addition, the Applicant anticipates being able to negotiate and agree appropriate bespoke protective provisions with AWS to protect AWS's apparatus and statutory functions, and to regulate the exercise of DCO powers so as to minimise interference with the operation and maintenance of AWS's existing assets.<br>Good practice measures to minimise vibration from construction works in accordance with BS 5228 are included in the **Outline CEMP** (Doc Ref. 7.10). These measures would limit the risk of damage to AWS assets from compaction and vibration. |
| Anglian Water Services Ltd | AWS notes the absence of full explanations given in the PEIR or consultation material on the following points:<br>• If water recycling/ sewerage services are required from AWS for the construction or operation of the scheme – see further comment below.<br>• If a water supply is required for the construction and operation of the scheme<br>• Whether the management of surface water will require a public sewer connection.<br>In view of the guidance in the National Policy Statements e.g. Overarching National Policy Statement for Energy (EN-1) (November 2023) and 2024 IAQM guidance15, AWS requests that these points are assessed in the EIA to set out how the project will be supplied with water, its wastewater managed, how water assets serving residents and business will be protected and how design has been altered to reduce the need for new water infrastructure or the diversion of existing assets. This is relevant for the construction, operation and de-commissioning stages. | N | During construction, the provision for water supply will be from commercial sources. It is not proposed that water supply is drawn from mains water for the construction of the Scheme, unless otherwise agreed by Anglian Water (mains water supplier). Measures to ensure water use are minimised would be considered further at detailed design.<br>During the operational period, only a relatively small supply is needed to support approximately 10 site staff, which is considered would have a negligible impact on water supply, even if sourced from mains water. The ES contains an estimate of likely water usage during operation. This is included under 'Water Supply and Water Resources' in Section 11.4 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). |

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| | | | In terms of water recycling/sewerage, as stated in **ES Chapter 2: The Scheme** (Doc Ref. 6.1) water would be disposed to a cess pit emptied by specialist licenced contractor and therefore no water recycling / sewerage services are required from AWS.<br><br>**ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) sets out the design principles for surface water drainage. The design would ensure compliance with planning policy with runoff from the Scheme to be attenuated to ensure no increase in surface water discharge rates and to provide water quality treatment of runoff water. Attenuation in the form of Sustainable Drainage Systems (SuDS) has been incorporated to control any increase in the rate of flow towards the receiving watercourses, and therefore a public sewer connection is not required.<br><br>Decommissioning activities would follow a similar approach to construction, with any temporary water requirements met from commercial sources and foul water managed via temporary facilities, such that no permanent water supply, sewerage services or public sewer connections would be required. |
| Anglian Water Services Ltd | For water recycling/ sewerage services Section 14.5.97 of the PEIR Volume 1 Chapter 14: Other Environmental Topics states *"For all phases of the Scheme, wastewater and sewage from welfare facilities would be stored on-Site and removed by tanker to an approved wastewater and sewage treatment centre. Associated waste is anticipated to be of a low volume and therefore is not considered likely to give rise to significant effects and not considered further."*<br><br>Whilst it is not expected to make any connections into existing AWS infrastructure, it is not explicitly clear if the foul water would be directed to an AWS facility and any agreement sought on this. The ES should also demonstrate agreement with the relevant consultation bodies. | N | No connection to the public sewer is proposed for foul sewage. The foul water flows will be dealt with via a sealed cesspit (with no overflow to ground pipe system). The cesspit would be regularly emptied by a licensed contractor to a facility which has capacity to accept the wastewater. The relevant contracts and agreements for this activity would be sought post-DCO consent.<br><br>The Proposed Foul Water Drainage Strategy for the Scheme is detailed in **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref 6.3). |
| Anglian Water Services Ltd | AWS does not consider that sufficient information has been provided to reach a conclusion on the project impacts regarding water supply. Impacts of climate change in terms of water availability are also of relevance. AWS requests that these points are covered in the EIA for all three stages. | N | During construction and decommissioning, the provision for water supply is expected to be from commercial sources. It is not proposed that water supply is drawn from mains water for the construction of the Scheme, unless otherwise agreed by Anglian Water (mains water supplier). Climate change is unlikely to influence the water supply needed during construction as it is temporary and over a short period of time.<br><br>During the operational period, only a relatively small supply is needed to support approximately 10 site staff, which is considered would have a negligible impact on water supply, even if sourced |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | | | from mains water. Therefore, it has been scoped out from further assessment.<br><br>The ES contains an estimate of likely water usage during operation. This is included under 'Water Supply and Water Resources' in Section 11.4 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). |
| Anglian Water Services Ltd | The project should not assume that water will be available for construction and operation. If that water supply is not available from AWS, then alternative supplies through local abstraction may cause environmental harm and so not be consented by the Environment Agency. The construction of alternative water supplies may themselves generate GHG. | N | During construction, the provision for water supply is expected to be from commercial sources. It is not proposed that water supply is drawn from mains water for the construction of the Scheme or from direct / local abstraction at the Site, unless otherwise agreed by Anglian Water (mains water supplier). Any water tankered in is assumed to be sourced in accordance with appropriate permits at its source. Therefore, impacts of construction water supply have been scoped out from further assessment, as the effects of that abstraction would have been considered in the permitting of the abstraction source.<br><br>During operation, the provision for water supply will be from commercial sources with dedicated clean water tanks provided. It is not proposed that water supply is drawn from mains water for the operation of the Scheme, unless otherwise agreed by Anglian Water (mains water supplier). This includes any maintenance activities during operation, including panel cleaning. However, connection to the mains supply for potable water for the permanent on-site offices remains an option to be considered in consultation with Anglian Water during detailed design post DCO consent. Based on the small number of employees to be present at the operational Scheme (10 full time equivalent (FTE)), it is considered the Scheme would cause no significant impact to the area of water stress, even if mains supply is utilised. Therefore, it has been scoped out from further assessment.<br><br>The ES contains an estimate of likely water usage during operation. This is included under 'Water Supply and Water Resources' in Section 11.4 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1).<br><br>Water use during construction has been considered within the GHG emissions assessment contained within **ES Chapter 7: Climate Change** (Doc Ref. 6.1) as a potential source of emissions. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Anglian Water Services Ltd | The Meridian project is located within the Water Resource Zones (WRZ) of Lincolnshire Bourne and designated as being within a 'seriously water stressed' region. In view of the potential impacts on water resources, the Applicant is advised to consider the published Water Resources East Regional Plan which sets out the collective water companies position. The AWS draft Water Resource Management Plan (WRMP) is available on our website Water resources management plan (anglianwater.co.uk). The WRMP should therefore be added to the data sources listed.<br><br>In summary, AWS has a statutory duty to supply water for domestic purposes. This means we are legally obliged to supply water to all household properties as well as any domestic requirements (e.g., drinking water, hand-basins, toilets and showers) of non-household properties. In many cases, domestic demand will be the only requirement for non-household properties (e.g., schools, hospitals, offices, shops and hairdressers). Non-domestic demand refers to water use for industrial processes, (e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type of water usage where it might put at risk our ability to supply water for domestic purposes. | N | The Anglian Water draft WRMP as referred to in the consultation response has been considered within Section 11.4 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). |
| Anglian Water Services Ltd | Although AWS does not have a statutory obligation to supply for non-domestic purposes in these circumstances, we factor this into our WRMP and we do everything we can to support businesses in the region, with the help of the water retail market. However, the situation is now changing, due to water supply being squeezed by abstraction reduction, climate change and a fast-growing population. Therefore, where new and unplanned non-domestic requests are received, which exceed 20,000 litres per day (0.020 Ml/d) (this may be less dependent on the availability of water in that area), or where there is a cumulative impact from a significant number of smaller requests, there might be the need to decline to protect existing supplies and the environment.<br><br>AWS has adopted a 'Non-Domestic Water Requests Policy - December 2024' (copy attached) which states that requests over 20m3/day will be declined. However, for NSIPs that are requesting over 20m3/day of non-domestic water (as defined above) for a scheme, a Water Resources Assessment (WRA) form must be completed. This is so we 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. | | The Scheme is not expected to require a supply from Anglian Water during construction, with any water requirements to be tankered in from commercial sources (unless otherwise agreed by Anglian Water) as stated in the **Outline CEMP** (Doc Ref. 7.10). This remains the case for any maintenance activities during operation, including panel cleaning. However, connection to the mains supply for potable water for the permanent on-site offices remains an option to be considered in consultation with Anglian Water during detailed design post DCO consent. Based on the small number of employees to be present at the operational Scheme (10 FTE), it is considered the Scheme would cause no significant impact to the area of Water Stress, even if mains supply is utilised. Therefore, it has been scoped out from further assessment.<br><br>The ES contains an estimate of likely water usage during operation. This is included under 'Water Supply and Water Resources' in Section 11.4 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). |
| Anglian Water Services Ltd | Our new position on non-household supply is due to our joint aim with the Environment Agency of reducing abstraction to protect sensitive environments. AWS now advise that new non household water supply requests (construction and operational phases) may be declined as these could compromise our regulatory priority of supplying existing and planned domestic growth.<br><br>To support appropriate water resource planning, AWS now requires that significant new non domestic water demands be set out in a WRA. For applications under the 2008 Act the WRA (or its summary) should form part of the EIA sufficient to enable regulators including the Environment | | The Scheme is not expected to connect into Anglian Water mains supply during construction and any water requirements will be tankered in from commercial sources (unless otherwise agreed by Anglian Water). Potential connection for site offices during occupation of the Site will be considered post DCO consent. However, based on the small number of employees to be present at the operational Scheme (10 FTE), it is considered the Scheme would |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | Agency to advise the Examining Authority and the Secretary of State that the supply of water to the project is deliverable and sustainable. A WRA would include setting out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses. AWS recommends that the WRA is an integral part of the PEIR Volume 1 Chapter 8: Hydrology, Flood Risk and WFD.<br><br>The flows needed to fill water storage tanks for example (if rainwater harvesting on site is not used to meet non-potable demand) will need to be assessed by AWS to advise whether a supply is feasible, when assessed in terms of the potential to jeopardise domestic supply or at a significant financial or environmental cost. | | cause no significant impact to the area of Water Stress, even if mains supply is utilised. Therefore, it has been scoped out from further assessment. |
| Anglian Water Services Ltd | AWS recommends that new water supply connections are not sought during construction and that potable water supply for welfare facilities, for example, are served by tanker to reduce the embedded (capital) carbon from providing new connections. The Applicant should confirm that there will be no temporary concrete batching facilities with consequent water demands and would be offsite and so not require an on-site supply. Water requirements for firefighting measures and construction traffic (dust suppression/ wheel washing areas) should also be explained.<br><br>We would advise you to contact planningliaison@anglianwater.co.uk to discuss the need for water and wastewater connections. The team can take you through the Inflow registration process InFlow \| Development Services, the need to submit a pre-planning enquiry request and the requirement to complete a WRA form which will also need to be included in the project's EIA. This should set out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses. A copy of our WRA template is attached with this letter. | N | No connection to Anglian Water mains is anticipated to be required during construction. It is anticipated that any concrete required for the construction would be obtained from a local batching plant. In addition, it is anticipated that the use of water for concrete curing and internal road construction may not be required where rainfall can be utilised.<br><br>The provision of fire water is a one-off demand and does not represent an ongoing supply need. It would only need to be replaced if the water is used in an emergency. If water for the water storage tanks for firefighting is to be obtained from the mains supply, a water supply request would be made to Anglian Water, accompanied by a Water Resource Assessment. The need for the mains supply connection will be confirmed at detailed design stage. Further details will be established through the detailed Battery Safety Management Plan (BSMP) and Emergency Response Plan ERP (ERP) to be prepared in accordance with the OBSMP post-DCO consent. See the **Outline Battery Safety Management Plan (OBSMP)** (Doc Ref. 7.18) for further details. |
| Anglian Water Services Ltd | AWS welcomes that the Flood Risk Assessment (FRA) will assess all applicable sources of flooding to and identify any mitigation measures required to ensure flood resilience, taking climate change into account, and to prevent any off-site impacts. We consider that this should help to avoid increased risk of ground water infiltration/ surface water ingress to our wastewater networks.<br><br>AWS welcomes that the surface water drainage has been scoped into the EIA (PEIR Volume 1 Chapter 8: Hydrology, Flood Risk and WFD) as referenced in Table 14-6-5 Preliminary Assessment of Major Accidents and Disasters - *"Surface water flooding would be managed through a Drainage Strategy, development in alignment with the EIA."* | N | **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3) considers all applicable sources of flooding, including fluvial, surface water, groundwater and tidal flooding, and identifies appropriate mitigation measures to ensure resilience of the development. Climate change has been factored into the assessment in line with current guidance, and the Environment Agency has been consulted on the hydraulic modelling to confirm approach and findings. **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) has been developed alongside this work to manage surface water runoff effectively and ensure there is no increase in flood risk within the Order limits or in surrounding areas. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Anglian Water Services Ltd | We consider that SuDS and the potential for rainwater harvesting to serve any non-potable water requirements, should be used. Notwithstanding the lead roles of the Lead Local Flood Authority, the Environment Agency and the Internal Drainage Boards, AWS would welcome clarification on how consequent impacts on the local drainage/ sewerage network will be designed as part of the scheme for both construction and operational stages.<br><br>As a result, we would want to ensure that there should be no right to connect powers included within the draft DCO on a temporary or permanent basis. AWS reserves its position on the need to be a consultee pre commencement Requirement on the final drainage strategy for the scheme to be submitted to the Councils, until the FRA is produced alongside the detailed design. | N | **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) incorporates sustainable drainage systems to manage surface water runoff. No connection will be made into the foul sewer network, and no discharges to the public foul system are proposed.<br><br>In terms of the potential for rainwater harvesting, as stated in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) the buildings within the substations will be investigated for the viability of rainwater harvesting during detailed design. The reuse of water captured on-site is also referred to within the **Outline CEMP** (Doc Ref. 7.10).<br><br>No right to connect powers have been included in the **draft DCO** (Doc Ref. 3.1), and Anglian Water have been added as a consultee to the drainage strategy requirement. |
| Anglian Water Services Ltd | AWS would welcome the instigation of discussions with the Meridian project team, in line with the requirements of the 2008 Planning Act and guidance. Experience has shown that early engagement and agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination.<br><br>On the basis that fuller consideration of water supply and water recycling matters does identify resources, assets and services may be impacted by the project we would recommend discussion on the following issues:<br><br>1. Impact of development on AWS's assets and the need for mitigation.<br>2. The design of the project to minimise interaction with AWS assets/critical infrastructure/ sewer and flood easements and landownership and specifically to avoid the need for diversions which have associated carbon costs<br>3. Requirement for potable and raw water supplies (if any)<br>4. Requirement for water recycling (surface water/ foul drainage) connections (if any)<br>5. Confirmation of the project's cumulative impacts with AWS's own infrastructure projects<br>6. Draft Protective Provisions<br><br>Please do not hesitate to contact us should you require clarification on the above response or during the pre- application to decision stages of the project. I suggest it would be worthwhile setting up a meeting to progress discussions. | N | Consultation and engagement with AWS has been undertaken in relation to the DCO Application. This consultation and engagement with AWS will continue following the submission of the DCO Application.<br><br>In response to the 6 points mentioned in the comment:<br><br>1& 2) The Scheme has been designed to minimise disruption to existing utilities. The Scheme is not expected to directly interact with existing AWS infrastructure. This has been identified through desk based assessment and engagement with AWS. Where practicable, infrastructure has been micro sited to avoid existing utilities. At detailed design, where interaction cannot be avoided, appropriate measures will be secured to protect existing apparatus and maintain AWS's statutory undertaking through the **Draft DCO** (Doc Ref. 3.1).<br><br>3) As stated above, during construction, the provision for water supply will be from commercial sources. It is not proposed that water supply is drawn from mains water for the construction of the Scheme, unless otherwise agreed by Anglian Water (mains water supplier). During the operational period, only a relatively small supply is needed to support approximately 10 site staff, which is considered to have a negligible impact on water supply, even if sourced from mains water. Therefore, it has been scoped out from further assessment. The ES contains an estimate of likely water usage during operation. This is included under 'Water Supply and |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | | | Water Resources' in Section 11.4 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1).<br><br>4) **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) sets out the design principles for surface water management. It incorporates Sustainable Drainage Systems (SuDS) to manage surface water runoff and provide water quality treatment. No connection will be made into the public foul sewer network, and no discharges to the public foul system are proposed.<br><br>5) Where relevant, cumulative schemes promoted by Anglian Water (such as Lincolnshire Reservoir) have been included within **ES Appendix 4-1: List of Cumulative Schemes** (Doc Ref. 6.3) and, where appropriate, scoped into further cumulative assessments presented within the ES topic chapters, no likely significant effects have been identified. As set out above, the Applicant is open to engaging with Anglian Water further on any proposed works to Anglian Water infrastructure in the vicinity of the Scheme.<br><br>6) The Applicant is engaging with AWS in relation to the inclusion of protective provisions within the **Draft DCO** (Doc Ref. 3.1). The Applicant anticipates being able to negotiate and agree appropriate protective provisions with AWS to protect AWS's apparatus and statutory functions, and to regulate the exercise of DCO powers so as to minimise interference with the operation and maintenance of existing utilities. |

## 2.3. Boston Borough Council

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Boston Borough Council | Whilst the applicant will seek permission for the proposals directly from the Secretary of State for a DCO under section 37 of the Planning Act 2008, there are still a number of local and national planning policies which are considered relevant and should be taken account of as part of the development process. These plans and local knowledge have been formed over several years and have come from a significant evidence base.<br><br>The South East Lincolnshire Local Plan 2011-2036 (SELLP) was adopted jointly by South Holland and Boston Borough Council on the 8 March 2019.<br><br>The relevant policies within the South East Lincolnshire Local Plan 2011-2036 are:<br>• Policy 2 'Development Management' – requires proposals to demonstrate sustainable development considerations have been met through a number of criteria.<br>• Policy 3 'Design of New Development' – requires development to create distinctive places through the use of high quality and inclusive design, demonstrating compliance with a number of considerations.<br>• Policy 4 'Approach to Flood Risk' – developments must satisfy the sequential test and be supported by a site-specific flood risk assessment covering risk from all sources of flooding including the impacts of climate change. It must be demonstrated that surface water from the development can be managed and will not increase the risk of flooding to third parties<br>• Policy 28 'The Natural Environment' – Requires the protection, enhancement and management of natural assets, by ensuring all development proposals provide an overall net gain in biodiversity.<br>• Policy 29 'The Historic Environment' - Distinctive elements of the South East Lincolnshire historic environment will be conserved and, where appropriate, enhanced.<br>• Policy 30 'Pollution' Development proposals will not be permitted where, taking account of any proposed mitigation measures they would lead to unacceptable adverse impacts upon:<br>• health and safety of the public;<br>• the amenities of the area; or<br>• the natural, historic and built environment;<br>• by way of:<br>• air quality, including fumes and odour;<br>• noise including vibration;<br>• light levels; and quality and condition; | N | Within the **Planning Statement** (Doc Ref. 7.1) the relevant national and local policy has been considered in the assessment of the proposals. The **Planning Statement Appendix C (**Doc Ref. 7.1) provides an assessment table for the relevant policies within the NPPF and local policy including consideration of the Southeast Lincolnshire Local Plan 2011-2036.<br><br>This table provides a specific policy response to each of the relevant policies within the Local Plan including: Policy 2 Development Management, Policy 3 Design of New Development, Policy 4 Approach to Flood Risk, Policy 5 Meeting Physical Infrastructure and Service Needs, Policy 6 Developer Contributions, Policy 28 The Natural Environment, Policy 29 The Historic Environment, Policy 30 Pollution, Policy 31 Climate Change and Renewable and Low Carbon Energy, Policy 32 Community, Health and Wellbeing, Policy 33 Delivering a More Sustainable Transport Network, ad  Policy 36 Vehicle and Cycle Parking. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | • or surface and groundwater quality.<br>• Planning applications, except for development within the curtilage of a dwellinghouse as specified within Schedule 2, Part 1 of The Town and Country Planning (General Permitted Development) (England) Order 2015, or successor statutory instrument, must include an assessment of:<br>• impact on the proposed development from poor air quality from identified sources;<br>• impact on air quality from the proposed development;<br>• impact on amenity from existing uses<br>• Policy 31 'Climate Change and Renewable and Low Carbon Energy' - All development proposals will be required to demonstrate that the consequences of current climate change has been addressed, minimised and mitigated.<br>• Policy 32 'Community, Health and Wellbeing' - Development shall contribute to the creation of socially-cohesive and inclusive communities; reducing health inequalities; and improving the community's health and well-being.<br>• Policy 33 'Delivering a More Sustainable Transport Network' – reinforces the national approach to promoting sustainable alternatives to the car through new development, making the best use of, and seek improvements to, existing transport infrastructure and services. Solutions that are based on better promotion and management of the existing network and the provision of sustainable forms of travel are supported. To achieve this, a Transport Assessment and associated Travel Plan will be submitted with proposals. | | |
| Boston Borough Council | The NPPF was originally implemented in 2012, with the most recent revision being 2019 and an update in 2024. The NPPF sets out the UK Government's planning policies for England and how these are expected to be applied<br>The NPPF does not contain specific policies for NSIPs (for which particular considerations apply, determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant NPSs) but may be considered as a relevant consideration as below:<br>• Paragraph 124 - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. Footnote 49 of the NPPF states except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity.<br>• Paragraph 125 - Planning policies and decisions should: | N | Within the **Planning Statement** (Doc Ref. 7.1) the relevant national and local policy has been considered in the assessment of the proposals. The **Planning Statement Appendix C** (Doc Ref. 7.1) provides an assessment table for the relevant policies within the NPPF and local policy.<br>This table provides a specific policy response to each of the relevant paragraphs within the NPPF (updated February 2025), including: Paragraphs 8, 85, 88, 96, 103, 105, 109, 116, 118, 124, 125, 131, 135, 137, 139, 161, 164, 168, 170, 181, 182, 187, 189, 192, 193, 198, 199, 207, 213, 216. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | • a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;<br>• b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;<br>• c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;<br>• d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure;<br>• e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers.<br>• Paragraph 161 - The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.<br>• Paragraph 170 - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.<br>• Paragraph 187 - Planning policies and decisions should contribute to and enhance the natural and local environment by:<br>• a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);<br>• b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; | | |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | • c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;<br>• d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;<br>• e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans<br>• f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate. | | |
| Boston Borough Council | Boston Borough Council are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses have been sought internally from department officers, parish councils and Councillors. All consultees have the ability to respond direct to the applicant as part of this process however we have presented any responses received.<br>Boston Borough Council do not have in house specialists or advisers for all areas therefore the below list of representations sets out the comments and advice received from internal consultees as well as external consultants employed by the Council. Where no comments have been received and no external consultant employed, this response will seek to comment generally on the topic areas where appropriate, however it is acknowledged that comments may be sent directly by the County Council and these will be endorsed by the Council.<br>As the Council do not have a Landscape Officer, an external company was sought to respond on behalf of the Council, Terra Loci, who are Landscape Architects and specialise in Landscape Planning. This forms the main part of our consideration as the landscape impacts are particularly important to the Council<br>The comments received from consultees are summarised as follows. Please note that for transparency the wording of each response is at is has been received as it is important that these are taken into account by the Applicant in their entirety, unless specified: | N | The Applicant notes this comment. |
| Boston Borough Council | Comments on Landscape and Visual Chapter and Figures (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)<br>*Structure and Methodology*<br>The chapter presents a logically structured preliminary assessment in accordance with GLVIA3 and relevant technical guidance. The separation between landscape and visual effects is clearly expressed, and the use of worst case parameters is welcomed and appropriate at this stage. | N | The Applicant notes this comment. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Boston Borough Council | *Study Areas and Viewpoints*<br>Viewpoints for the grid connection corridor should be submitted and agreed, these should include viewpoints within the administrative areas of Boston Borough Council. | N | Viewpoints 28 and 29 have been included, as shown on **ES Figures 12-19 and 12-20** (Doc Ref. 6.2), to provide long distance views of the Scheme. They are approximately 6km and 10km from the Scheme respectively. These viewpoint locations are sites within the administrative boundary of Boston Borough Council and have been assessed within the LVIA. The locations of these viewpoints were consulted on and agreed with LCC, SHDC and BBC. |
| Boston Borough Council | *Landscape Receptors*<br>Figure 10 6 shows the landscape character types mapped for the assessment. No landscape character types from the Landscape Character Assessment of Boston Borough Council – these character types should be mapped and included within the assessment in order to understand the potential for indirect landscape effects, particularly those arising from the Grid Connection Corridor. | N | As stated within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) the northernmost part of the 10km Grid Connection Route study area intersects with the southern part of the Boston Borough and four of its landscape character areas (LCAs). These landscape character areas have been mapped **ES Figure 12-6 (**Doc Ref. 6.2) and considered within the assessment. |
| Boston Borough Council | *Zone of Theoretical Visibility (ZTV)*<br>The ZTVs appear thorough, and the use of LiDAR based DSM and DTM data is appropriate. That said, the ES should comment on the age and consistency of the screening dataset (given some data is up to nine years old), particularly where vegetation growth or removal may influence visibility. | N | The barrier earth viewshed analysis, presented within **ES Figures 12-12 to 12-18** (Doc Ref. 6.2) has been generated using Environment Agency Digital Terrain Model (DTM), dated 2025, with a 2m resolution.<br>To provide evidence of theoretical screening, two additional databases have been included:<br>• OS Open Data (2025) with assumed height for buildings of 8m; and<br>• The Forestry Commission National Forestry Inventory (2025) and Ancient Woodland (2025), with an assumed vegetation height of 12m.<br>These datasets represent the most up-to-date available information and provide a consistent basis for assessing potential screening effects. |
| Boston Borough Council | *Baseline and Future Baseline*<br>There is no apparent consideration of the future baseline, either in terms of landscape change (e.g. planned developments, habitat maturation, climate adaptation plans) or likely future land use. This is a key gap and should be addressed in the ES to ensure assessments remain valid over the 40+ year lifetime of the scheme. | N | The future baseline is addressed within Section 12.6 within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1), which considers the likely evolution of the landscape in the absence of the Scheme which acknowledges that the future landscape and visual baseline across the study area is anticipated to remain broadly unchanged. However, built development within the study area is expected to increase, in particular, the number of residential receptors, predominantly around the existing settlements, notably larger settlements identified as Sub-Regional and Main Service Centres within the Local Plan. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Boston Borough Council | *Stakeholder Consultation*<br>There is no reference to the joint consultation response submitted on behalf of the Local Planning Authorities in June 2024. While it is evident that the majority of comments from that response have been addressed, this omission should be corrected for transparency and to demonstrate due regard to statutory consultees. | N | The consultation response is referenced within the Table 12-3 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |
| Boston Borough Council | *Landscape Mitigation Strategy*<br>Mitigation should focus on reinforcing local landscape pattern linear hedgerows, field boundary enhancements, and scattered trees rather than introducing elements out of character with the receiving landscape. | N | The **OLEMP** (Doc Ref. 7.16) describes the landscape and ecological strategy for planting across the Site which has been designed to provide screening whilst ensuring that the planting proposals are in keeping with the surrounding landscape character (e.g. linear hedgerows, field boundary enhancements and scattered trees). |
| Boston Borough Council | *Lighting*<br>The PEIR includes limited commentary on lighting, noting only that lighting will be sensor activated and limited to key infrastructure. In such a rural, low light baseline, even temporary lighting may result in noticeable visual intrusion.<br>A more detailed assessment of night time visual effects is recommended at the ES stage, with clarity on lighting locations, specification, timing, and mitigation. | N | Night-time visual effects from lighting have been considered within **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3) and Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). During the construction and decommissioning phases, temporary lighting may be required to enable safe working where activities are undertaken outside of daylight hours. Temporary lighting will be designed as far as practical to reduce the potential for light spillage and glare outside of the Scheme.<br>Lighting will not be required for the solar PV modules during the operational phase. Non-continuous sensor triggered infrared lighting would be positioned around critical electrical infrastructure within the BESS and On-Site Substation Compounds and Cable Sealing End Compounds for security purposes and emergency maintenance. Directional lighting would be used, directed away from Site boundaries. As such, lighting will be limited and unlikely to result in significant visual effects at night-time.<br>Good practice measures to minimise light spill off-site have been included within the **OCEMP** (Doc Ref. 7.10), **OLEMP** (Doc Ref. 7.16) and **ODEMP** (Doc Ref. 7.12). |
| Boston Borough Council | *Cumulative Effects*<br>The approach to cumulative assessment is appropriate in scope but currently underdeveloped. The ES should provide a clear matrix of cumulative landscape and visual effects, distinguishing between cumulative landscape character impacts and cumulative visual impacts from key receptor locations. | N | The cumulative assessment for landscape and visual has been further developed and is presented in Section 12.11 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). This distinguishes between cumulative landscape character impacts and cumulative visual impacts from key receptor locations. |
| Boston Borough Council | Comments on Landscape and Visual Assessment Tables (PEIR Volume III, Appendices 10 1 & 10 2)<br>*Landscape Assessment Tables (Appendix 10 1)* | N | The Applicant notes this comment. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | *Clarity and Structure*<br>The tables are well structured, following a consistent format across receptors and phases. The distinction between the PV Area, Inter Array Areas, and Grid Connection Corridor is helpful for clarity | | |
| Boston Borough Council | *Operational Phase Assessments*<br>Commentary on how much mitigation moderates character change over time is relatively limited. Statements such as "effects remain as per Year 1" potentially understate the impact of 15 years of vegetation growth, and this should be elaborated on. | N | The effects of proposed mitigation on landscape character and visual amenity, including how mitigation moderates character change over time, have been assessed within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided in Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). These assessments consider the nature, timing, and anticipated success of mitigation measures, including the establishment and growth of planting, and how these influence the degree of change and residual effects over the operational period. Commentary is provided on the extent to which mitigation reduces effects and the limitations on reversibility, ensuring that the assessment does not overstate the potential for full restoration. |
| Boston Borough Council | *Mitigation and Long-Term Residual Effects*<br>There is a need for more detailed commentary on the nature and success of mitigation over time. For example, while planting is said to "slightly reduce openness", the degree to which this creates a new character baseline or modifies perceptual qualities is left vague. The ES should expand on this to avoid overstating reversibility.<br>As stated above, indirect effects on Landscape Character Types as defined within The Landscape Character Assessment of Boston Borough Council should be considered. | N | The effects of proposed mitigation on landscape character and visual amenity, including how mitigation moderates character change over time, have been assessed within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided in Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). These assessments consider the nature, timing, and anticipated success of mitigation measures, including the establishment and growth of planting, and how these influence the degree of change and residual effects over the operational period. Commentary is provided on the extent to which mitigation reduces effects and the limitations on reversibility, ensuring that the assessment does not overstate the potential for full restoration.<br>As stated within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) the northernmost part of the 10km Grid Connection Route study area intersects with the southern part of the Boston Borough and four of its landscape character areas (LCAs). These landscape character areas have been mapped **ES Figure 12-6 (**Doc Ref. 6.2) and considered within the assessment. |
| Boston Borough Council | *Visual Assessment Tables (Appendix 10 2)* | N | Viewpoints 28 and 29 have been included, as shown on **ES Figures 12-19** and **12-20** (Doc Ref. 6.2), to provide long distance views of |

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| | *Viewpoint Coverage and Selection*<br>The tables document a robust range of receptor types and distances. However, as previously noted, no viewpoints are presented beyond 10km. While effects beyond this distance are unlikely to be significant, inclusion of some representative viewpoints from 10–15km (especially near sensitive settlements or designated landscapes) would help confirm this and improve confidence. | | the Scheme. They are approximately 6km and 10km from the Scheme respectively. The locations of these viewpoints were consulted on and agreed with LCC, SHDC and BBC. |
| Boston Borough Council | *Receptor Grouping and Sensitivity*<br>Sensitivity ratings generally appear appropriate, though some footpath users (e.g. long-distance trails) might warrant higher sensitivity ratings than currently shown depending on context. Specific justification for ratings should be confirmed in the ES. | N | Sensitivity ratings of visual receptors have been explained in detail in **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), considering the links between visibility, viewer expectations, and landscape context.<br>Photomontages showing both winter and summer conditions are provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2).<br>Effects of proposed mitigation have been considered as part of the Operational Year 15 assessment within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |
| Boston Borough Council | *Operational and Residual Effects*<br>For several viewpoints, especially closer to the PV Area and pylons, the magnitude of change is reported as 'Medium', but the supporting commentary downplays visual transformation. A clearer link between visibility, viewer expectations, and landscape context is needed to justify conclusions. | N | Sensitivity ratings of visual receptors have been explained in detail in **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), considering the links between visibility, viewer expectations, and landscape context. |
| Boston Borough Council | *Lack of Photomontages*<br>No photomontages are included at this stage. While this is acceptable for the PEIR, their inclusion will be essential in the ES for receptors experiencing 'Significant' effects. These should include both winter and summer conditions and align with relevant technical guidance (e.g. LI Visualisation Standards, 2019). | N | Photomontages have been produced in accordance with TGN 06/19 Visual Representation of Development Proposals[1] and are presented in **ES Figures 12-21 and 12-22** (Doc Ref. 6.2). |
| Boston Borough Council | *Mitigation Commentary*<br>Similar to the landscape assessment, mitigation effects are sometimes described vaguely. Statements such as "vegetation will establish" should be substantiated with timelines, species detail, and visual screening potential. For visual receptors in particular, perceptibility and seasonal variation of planting success should be explicitly acknowledged. | N | These details are set out within the **OLEMP** (Doc Ref. 7.16) which presents the proposed landscape management strategy for the Scheme. |
| Boston Borough Council | Concerns Regarding Landscape and Visual Impacts from the Grid Connection Corridor Pylons | N | The landscape and visual effects of the Grid Connection Route and associated infrastructure within the existing context have been |

[1] Landscape Institute (2019) TGN 06/19 Visual representation of development proposals. Available at: https://www.landscapeinstitute.org/visualisation/. [Accessed 01/11/2025]

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | The introduction of a new lattice pylon line as part of the Grid Connection Corridor represents one of the most visually and physically prominent elements of the proposed development. The associated landscape and visual effects arising from this infrastructure raise a number of concerns that warrant closer scrutiny:<br><br>*Landscape Context and Character Effects*<br><br>The erection of large-scale pylons through open landscapes introduces a vertical, engineered typology that is fundamentally out of scale and character with the flat, expansive and predominantly horizontal qualities of the area.<br><br>While the assessment acknowledges 'significant' effects on landscape character during operation, the commentary does not fully engage with the transformative nature of this infrastructure, particularly its potential to introduce a more industrialised character along an otherwise rural corridor.<br><br>The assertion that effects remain unchanged between Year 1 and Year 15, despite the implementation of planting, suggests either an underestimation of residual impact or a lack of effective mitigation. This should be more critically examined and clarified in the ES. | | assessed in detail within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1).<br><br>Photomontages, provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2), include views of the proposed Grid Connection Route.<br><br>In terms of the comment that effects in Year 1 and Year 15 remain despite the implementation of planting, this is because there is very limited visual mitigation which can be used to screen the pylons which is reflected in the assessment. |
| Boston Borough Council | *Visual Amenity and Receptor Sensitivity*<br><br>Several visual receptors including residential properties, PRoW users, and settlement edge locations are likely to experience prolonged and unavoidable views of the proposed pylons. This is especially pertinent given the limited screening capacity within the flat landscape.<br><br>Further photomontage testing is required to demonstrate this with confidence. | N | The landscape and visual effects of the Grid Connection Route and associated infrastructure within the existing context have been assessed in detail within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1).<br><br>Photomontages, provided within **ES Figures 12-21** and **12-22** (Doc Ref. 6.2), include views of the proposed Grid Connection Route. |
| Boston Borough Council | *Cumulative Effects*<br><br>The presence of other vertical infrastructure in the wider area (e.g. existing pylons, wind turbines) is noted, but the cumulative visual and landscape impact of introducing an entirely new pylon corridor of this scale has not been robustly addressed.<br><br>There is potential for the proposed infrastructure to tip the balance from a rural to semi-industrial visual character in some localities, which could have implications for settlement setting and local amenity. | N | Cumulative effects assessment is presented within **ES Appendix 12-7: LVIA Cumulative Effects** (Doc Ref. 6.3) and summarised within Section 12.11 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). Photomontages reflecting views of the proposed Grid Connection Route within the context of existing infrastructure and proposed cumulative overhead lines have been provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2).<br><br>**ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) has considered the landscape and visual effects of the industrialisation of a predominantly rural area and change of use of agricultural land, as set out within **ES Appendix 12-4: Landscape Assessment** (Doc Ref 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3). |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Boston Borough Council | *Justification and Alternatives*<br><br>At this stage, the PEIR provides limited information on the design rationale for the pylon alignment, tower type, and why alternative connection methods (e.g. undergrounding in visually sensitive areas) were dismissed.<br><br>A clearer justification is required in the ES, particularly for sections of the route that pass close to sensitive receptors or intersect open, exposed fenland landscapes. | N | **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) provides information on the alternatives considered and justification for selecting the design for the Grid Connection Route.<br><br>Following the identification of the Site for the Solar Development Area, work was undertaken to inform the siting of the Grid Connection Route for connecting to the future NGET Weston Marsh Substation. In accordance with the starting presumption for overhead lines set out in paragraph 2.9.21 of NPS EN-5, the routeing assessment was based on the assumption that the Grid Connection Route would comprise an overhead line supported by lattice-style pylons. A comparison of the environmental effects of an underground cable and an overhead line is provided within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). When reviewed in combination with engineering feasibility, constructability and cost considerations, a 400kV overhead line was taken forward as the preferred option over an underground cable.<br><br>Holford Rules provide guidelines to seek to avoid adverse impacts through careful routeing of overhead lines. They formed part of the underlying design principles for the Grid Connection Route and the siting of pylons. Further discussion on how the Holford Rules were followed as part of the siting and design of the Scheme is included within the **Design Approach Document** (Doc Ref. 7.3), submitted as part of this DCO Application. |
| Boston Borough Council | *Environmental protection*<br><br>No comment has been received during the consultation period. | N | The Applicant notes this comment. |
| Boston Borough Council | <u>Forward Planning (Planning Policy) – joint response for South Holland DC and Boston BC</u><br><br>The local plan contains Policy 31: Climate change and renewable and low carbon energy. Part B relates to renewable energy and contains a list of criteria. One relates to land take and this proposal covers about 600H plus the inter array links. It seems that about 26% is not best and most versatile land. The layout of the solar panels also indicates that the best quality land has not been used for the erecting solar panels. However, a lot of grade 2 and 3a land will be used and given the growing concerns about agricultural land loss this impact is still significant.<br><br>The layout seeks to limit impact on heritage assets by setting the proposal back from scheduled monuments.<br><br>The cable connections between the parcels of land across the 'inter array' land may be buried cables or overhead cables. Overhead cables clearly have a greater impact although the size of the supporting structures appear to be quite normal in our landscape (15m). However, of much more | N | An assessment of impacts and effects on agriculture and soils is presented within Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) . As secured through Requirement 21 of the **Draft DCO** (Doc Ref. 3.1) and described within **ES Chapter 2: The Scheme** (Doc Ref. 6.1), all above ground infrastructure associated with the Scheme will be decommissioned at the end of the 40-year operational period. While the duration of operation is long term, the assessment of impacts on agriculture and soils distinguishes between reversible and irreversible land-use change. As no permanent soil sealing is proposed and all infrastructure will be removed, the Scheme does not result in the permanent loss of agricultural land. |

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| | concern is the size of the pylons that will take the electricity to the proposed Weston Marsh substation. These are likely to be 50m high and around 350m apart and extend for 13 km. This will add to the concerns on the Grimsby to Walpole grid upgrade impact on the landscape. I have been involved with the Heckington Fen solar farm (granted) and the Beacon Fen solar farm that has been submitted to PINS (both in North Kesteven). Both use underground cabling to the substation at Bicker Fen in Boston Borough. Beacon Fen to Bicker is similar to this site connecting to Weston Marsh substation. Why can't this proposal go underground to the Weston marsh substation?<br><br>This area of South Holland, although not totally devoid of trees in the landscape, is not well treed. The viewpoint photos show this and the proposals show quite significant planting proposals to soften the impact of the scheme. Heckington Fen and Beacon Fen have a single uniform site for the solar farm rather than three in this case and do not have the visual impact for the grid connection. Beacon Fen decided not to progress a second site in their proposal. Heckington Fen and Beacon Fen, therefore, have a more simple case of loss of best and most versatile land V renewable electricity. This scheme also includes landscape impact in the planning balance owing to the lack of trees and the overhead cable connection to Weston Marsh. | | The **OSMP** (Doc Ref. 7.14) includes measures to protect soil structure and function throughout construction and operation, including careful handling, storage, and reinstatement of soils. These measures are designed to ensure that the soil resource is safeguarded and that agricultural capability is not degraded over the lifetime of the Scheme.<br><br>Following decommissioning, the land will be restored so far as reasonably practicable to its pre-construction condition, with the aim of returning it to its existing ALC grade. Post-restoration monitoring is secured within the **OSMP** (Doc Ref. 7.14), and any minor variability from baseline ALC grades identified at that stage would be investigated and addressed to ensure the land is capable of productive agricultural use once reinstated.<br><br>On this basis, while a substantial proportion of the Site comprises BMV land, the majority of the effects from land-take are long-term but reversible, and do not constitute a permanent loss of agricultural land.<br><br>However, there is some uncertainty around whether Grade 1 and 2 land which has been temporarily sealed under hardstanding can be restored to the same ALC grade following decommissioning. As such for a worst-case assessment of impacts, the temporary use of any Grade 1 and 2 land for infrastructure which requires hardstanding to be established has been considered to result in a permanent loss of these grades. In addition, the establishment of trees and shrubs along field boundaries has been assessed as permanent loss of agricultural land.<br><br>In terms of why an overhead line is proposed rather than an underground cable, as stated within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) overhead lines are the preferred technology as guided by national policy contained in the NPS for Electricity Networks, EN-5. Paragraph 2.9.20 states that it is the Government's position that overhead lines should be the strong starting presumption for electricity networks in general. This presumption is reversed where an overhead line would cross a nationally designated landscape; however, the Scheme would neither directly or indirectly impact one of these sites and therefore the presumption of an overhead line for the connection is considered wholly appropriate. |

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| | | | Impacts from the Scheme on the local landscape and visual amenity of the surrounding area have been fully assessed within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). That chapter within the environmental statement provides a full assessment of the effects of the Scheme on various receptors. The conclusions drawn from the assessment have been used to inform the most effective mitigation measures and therefore to decrease the impact of the Scheme on the environment as much as reasonably practicable.<br><br>Regarding the planning balance and the assessment of Local Plan Policy 31 Climate Change and Renewable and Low Carbon Energy, section 5 of the **Planning Statement** (Doc Ref. 7.1) provides a comprehensive planning assessment. This section analyses the results of the ES Chapters, including **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) and **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1), and assesses how the identified residual significant effects, if any, effects the overall planning balance. This section's assessment is conducted with consideration of both national and local policy where relevant. |
| Boston Borough Council | Conservation Assistant (Tree Preservation)<br><br>No comment has been received during the consultation period. | N | The Applicant notes this comment. |
| Boston Borough Council | Conservation Officer (Heritage)<br><br>No comment has been received during the consultation period. | N | The Applicant notes this comment. |
| Boston Borough Council | Parish Councils<br><br>Due to parish council meeting dates, it is not always possible for them to comment in time. we have received comments from Gedney Parish and others are likely to comment directly. | N | The Applicant notes this comment. |
| Boston Borough Council | Review of the Preliminary Environmental Report<br><br>At this stage the following comments are offered in connection with the topic areas as listed. As stated in the aforementioned section, where no opinion has been received from in-house advisors at the Council nor has there been an external consultant employed to provide comment then general observations have been put forward at this stage. We acknowledge that the built form is based in South Holland District boundary however there are visual impacts on Boston Borough Council and so the response is predominately based upon landscape visual impacts, as best demonstrated by the submitted ZTV (Zone of Theoretical Visibility) which was submitted as part of the PEIR documents which the visual impacts of the grid infrastructure to the north of the development site area including overhead pylons and substations. | N | The Applicant notes this comment. |

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| Boston Borough Council | Comments on Landscape and Visual Chapter and Figures (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)<br>*Structure and Methodology*<br>The chapter presents a logically structured preliminary assessment in accordance with GLVIA3 and relevant technical guidance. The separation between landscape and visual effects is clearly expressed, and the use of worst case parameters is welcomed and appropriate at this stage. | N | The Applicant notes this comment. |
| Boston Borough Council | *Study Areas and Viewpoints*<br>The study areas defined for both the PV Area and the Grid Connection Corridor are appropriate in extent and rationale. The tiered approach to the visual assessment providing a detailed review within 0–5km, grouped assessment from 5–10km, and summary review from 10–15km is supported. This is a proportionate strategy that rightly prioritises the most likely areas of significant effect.<br>However, while it is accepted that significant effects are less likely beyond 10km, the omission of any viewpoints in the 10–15km range is a concern. Inclusion of at least some viewpoints within this outer range would aid transparency and understanding of either the potential for effects or the confidence with which a lack of effects is asserted. Their inclusion would be especially useful in demonstrating how the tallest elements (e.g. pylons) relate to distant sensitive receptors.<br>Viewpoints for the grid connection corridor should be submitted and agreed, these should include viewpoints within the administrative areas of Boston Borough Council. | N | Viewpoints 28 and 29 have been included, as shown on **ES Figures 12-19 and 12-20** (Doc Ref. 6.2), to provide long distance views of the Scheme. They are approximately 6km and 10km from the Scheme respectively. The locations of these viewpoints were consulted on and agreed with LCC, SHDC and BBC. |
| Boston Borough Council | *Landscape Receptors*<br>Figure 10 6 shows the landscape character types mapped for the assessment. No landscape character types from the Landscape Character Assessment of Boston Borough Council – these character types should be mapped and included within the assessment in order to understand the potential for indirect landscape effects, particularly those arising from the Grid Connection Corridor. | N | As stated within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) the northernmost part of the 10km Grid Connection Route study area intersects with the southern part of the Boston Borough and four of its landscape character areas (LCAs). These landscape character areas have been mapped **ES Figure 12-6 (**Doc Ref. 6.2) and considered within the assessment. |
| Boston Borough Council | *Zone of Theoretical Visibility (ZTV)*<br>The clarification provided on building heights used for ZTV modelling is helpful, and the inclusion of both bare earth and screened ZTVs is good practice.<br>The ZTVs appear thorough, and the use of LiDAR based DSM and DTM data is appropriate. That said, the ES should comment on the age and consistency of the screening dataset (given some data is up to nine years old), particularly where vegetation growth or removal may influence visibility. | N | The barrier earth viewshed analysis, presented within **ES Figures 12-12 to 12-18 (Doc Ref. 6.2)** has been generated using Environment Agency Digital Terrain Model (DTM), dated 2025, with a 2m resolution.<br>To provide evidence of theoretical screening, two additional databases have been included:<br>• OS Open Data (2025) with assumed height for buildings of 8m; |

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| | | | • and the Forestry Commission National Forestry Inventory (2025) and Ancient Woodland (2025), with an assumed vegetation height of 12m.<br><br>These datasets represent the most up-to-date available information and provide a consistent basis for assessing potential screening effects. |
| Boston Borough Council | *Baseline and Future Baseline*<br><br>The baseline review appears comprehensive and is informed by a sound range of data sources and site visits.<br><br>However, there is no apparent consideration of the future baseline, either in terms of landscape change (e.g. planned developments, habitat maturation, climate adaptation plans) or likely future land use. This is a key gap and should be addressed in the ES to ensure assessments remain valid over the 40+ year lifetime of the scheme. | N | The future baseline is addressed within Section 12.6 within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1), which considers the likely evolution of the landscape in the absence of the Scheme which acknowledges that the future landscape and visual baseline across the study area is anticipated to remain broadly unchanged. However, built development within the study area is expected to increase, in particular, the number of residential receptors, predominantly around the existing settlements, notably larger settlements identified as Sub-Regional and Main Service Centres within the Local Plan. |
| Boston Borough Council | *Stakeholder Consultation*<br><br>The PEIR chapter references consultation responses from the Planning Inspectorate and Gedney Hill Parish Council, which is appropriate.<br><br>However, it makes no reference to the joint consultation response submitted on behalf of the Local Planning Authorities in June 2024. While it is evident that the majority of comments from that response have been addressed, this omission should be corrected for transparency and to demonstrate due regard to statutory consultees. | N | This consultation response is referenced within the Table 12-3 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |
| Boston Borough Council | *Landscape Mitigation Strategy*<br><br>The planting proposals are noted as indicative and still under development, which is reasonable at this stage. The intention to avoid archaeological constraint areas is supported.<br><br>Mitigation should focus on reinforcing local landscape pattern linear hedgerows, field boundary enhancements, and scattered trees rather than introducing elements out of character with the receiving landscape. | N | The landscape strategy presented within the **OLEMP** (Doc Ref. 7.16) has been developed in liaison with heritage specialists to avoid significant effects on below ground archaeology.<br><br>The **OLEMP** (Doc Ref. 7.16) describes the landscape and ecological strategy for planting across the Site which has been designed to provide screening whilst ensuring that the planting proposals are in keeping with the surrounding landscape character (e.g. linear hedgerows, field boundary enhancements and scattered trees). |
| Boston Borough Council | *Lighting*<br><br>The PEIR includes limited commentary on lighting, noting only that lighting will be sensor activated and limited to key infrastructure. In such a rural, low light baseline, even temporary lighting may result in noticeable visual intrusion. | N | Night-time visual effects from lighting have been considered within **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3) and Section 12.8 of this chapter. During the construction and decommissioning phases, temporary lighting may be required to enable safe working where activities are undertaken outside of daylight hours. |

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| | A more detailed assessment of night time visual effects is recommended at the ES stage, with clarity on lighting locations, specification, timing, and mitigation. | | Temporary lighting will be designed as far as practical to reduce the potential for light spillage and glare outside of the Scheme.<br><br>Lighting will not be required for the solar PV modules during the operational phase. Non-continuous sensor triggered infrared lighting would be positioned around critical electrical infrastructure within the BESS and On-Site Substation Compounds and Cable Sealing End Compounds for security purposes and emergency maintenance. Directional lighting would be used, directed away from Site boundaries. As such, lighting will be limited and unlikely to result in significant visual effects at night-time.<br><br>Good practice measures to minimise light spill off-site have been included within the **OCEMP** (Doc Ref. 7.10), **OLEMP** (Doc Ref. 7.16) and **ODEMP** (Doc Ref. 7.12). |
| Boston Borough Council | *Cumulative Effects*<br><br>The approach to cumulative assessment is appropriate in scope but currently underdeveloped. The ES should provide a clear matrix of cumulative landscape and visual effects, distinguishing between cumulative landscape character impacts and cumulative visual impacts from key receptor locations. | N | The cumulative assessment for landscape and visual has been further developed and is presented in Section 12.11 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). This distinguishes between cumulative landscape character impacts and cumulative visual impacts from key receptor locations. |
| Boston Borough Council | Comments on Landscape and Visual Assessment Tables (PEIR Volume III, Appendices 10 1 & 10 2)<br><br>*Landscape Assessment Tables (Appendix 10 1)*<br><br>*Clarity and Structure*<br><br>The tables are well structured, following a consistent format across receptors and phases. The distinction between the PV Area, Inter Array Areas, and Grid Connection Corridor is helpful for clarity. | N | The Applicant notes this comment. |
| Boston Borough Council | *Operational Phase Assessments*<br><br>Many landscape receptors are assessed as having 'Medium' magnitude of change with 'Significant' effects during operation (Years 1 and 15), especially within HLCAs and HLCZs. However, commentary on how much mitigation moderates character change over time is relatively limited. Statements such as "effects remain as per Year 1" potentially understate the impact of 15 years of vegetation growth, and this should be elaborated on. | N | The impacts of proposed mitigation on the existing landscape character and the provision of screening have been considered within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). In terms of the comment that effects in Year 1 and Year 15 remain despite the implementation of planting, this is because there is very limited visual mitigation which can be used to screen the pylons which is reflected in the assessment. |
| Boston Borough Council | *Mitigation and Long Term Residual Effects* | N | The impacts of proposed mitigation on the existing landscape character and the provision of screening have been considered within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) |

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| | There is a need for more detailed commentary on the nature and success of mitigation over time. For example, while planting is said to "slightly reduce openness", the degree to which this creates a new character baseline or modifies perceptual qualities is left vague. The ES should expand on this to avoid overstating reversibility.<br><br>As stated above, indirect effects on Landscape Character Types as defined within The Landscape Character Assessment of Boston Borough Council should be considered. | | and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). In terms of the comment that effects in Year 1 and Year 15 remain despite the implementation of planting, this is because there is very limited visual mitigation which can be used to screen the pylons which is reflected in the assessment.<br><br>As stated within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) the northernmost part of the 10km Grid Connection Route study area intersects with the southern part of the Boston Borough and four of its landscape character areas (LCAs). These landscape character areas have been mapped **ES Figure 12-6 (**Doc Ref. 6.2) and considered within the assessment. |
| Boston Borough Council | *Visual Assessment Tables (Appendix 10 2)*<br><br>*Viewpoint Coverage and Selection*<br><br>The tables document a robust range of receptor types and distances. However, as previously noted, no viewpoints are presented beyond 10km. While effects beyond this distance are unlikely to be significant, inclusion of some representative viewpoints from 10–15km (especially near sensitive settlements or designated landscapes) would help confirm this and improve confidence. | N | Viewpoints 28 and 29 have been included, as shown on **ES Figures 12-19 and 12-20** (Doc Ref. 6.2), to provide long distance views of the Scheme. They are approximately 6km and 10km from the Scheme respectively. These viewpoint locations are sites within the administrative boundary of Boston Borough Council. The locations of these viewpoints were consulted on and agreed with LCC, SHDC and BBC. |
| Boston Borough Council | *Receptor Grouping and Sensitivity*<br><br>Sensitivity ratings generally appear appropriate, though some footpath users (e.g. long distance trails) might warrant higher sensitivity ratings than currently shown depending on context. Specific justification for ratings should be confirmed in the ES. | N | Sensitivity ratings of visual receptors have been explained in detail in **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), considering the links between visibility, viewer expectations, and landscape context. |
| Boston Borough Council | *Operational and Residual Effects*<br><br>For several viewpoints, especially closer to the PV Area and pylons, the magnitude of change is reported as 'Medium' but the supporting commentary downplays visual transformation. A clearer link between visibility, viewer expectations, and landscape context is needed to justify conclusions. | N | Sensitivity ratings of visual receptors have been explained in detail in **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), considering the links between visibility, viewer expectations, and landscape context. |
| Boston Borough Council | *Lack of Photomontages*<br><br>No photomontages are included at this stage. While this is acceptable for the PEIR, their inclusion will be essential in the ES for receptors experiencing 'Significant' effects. These should include both | N | Photomontages have been produced in accordance with TGN 06/19 Visual Representation of Development Proposals[2] and are presented in **ES Figures 12-21 and 12-22** (Doc Ref. 6.2). |

[2] Landscape Institute (2019) TGN 06/19 Visual representation of development proposals. Available at: https://www.landscapeinstitute.org/visualisation/. [Accessed 01/11/2025]

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| | winter and summer conditions and align with relevant technical guidance (e.g. LI Visualisation Standards, 2019). | | |
| Boston Borough Council | *Mitigation Commentary*<br>Similar to the landscape assessment, mitigation effects are sometimes described vaguely. Statements such as "vegetation will establish" should be substantiated with timelines, species detail, and visual screening potential. For visual receptors in particular, perceptibility and seasonal variation of planting success should be explicitly acknowledged. | N | These details are set out within the **OLEMP** (Doc Ref. 7.16) which presents the proposed landscape management strategy for the Scheme. |
| Boston Borough Council | Comments Regarding Landscape and Visual Impacts from the Grid Connection Corridor Pylons<br>The introduction of a new lattice pylon line as part of the Grid Connection Corridor represents one of the most visually and physically prominent elements of the proposed development. The associated landscape and visual effects arising from this infrastructure raise a number of concerns that warrant closer scrutiny<br>*Landscape Context and Character Effects*<br>The erection of large scale pylons through open landscapes introduces a vertical, engineered typology that is fundamentally out of scale and character with the flat, expansive and predominantly horizontal qualities of the area.<br>While the assessment acknowledges 'significant' effects on landscape character during operation, the commentary does not fully engage with the transformative nature of this infrastructure, particularly its potential to introduce a more industrialised character along an otherwise rural corridor.<br>The assertion that effects remain unchanged between Year 1 and Year 15, despite the implementation of planting, suggests either an underestimation of residual impact or a lack of effective mitigation. This should be more critically examined and clarified in the ES.<br>*Visual Amenity and Receptor Sensitivity*<br>Several visual receptors including residential properties, PRoW users, and settlement edge locations are likely to experience prolonged and unavoidable views of the proposed pylons. This is especially pertinent given the limited screening capacity within the flat landscape.<br>While mitigation planting is proposed along parts of the route, its effectiveness in screening tall lattice towers is questionable and may offer only minimal visual relief. Further photomontage testing is required to demonstrate this with confidence. | N | The landscape and visual effects of the Grid Connection Route and associated infrastructure within the existing context have been assessed in detail within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1).<br>Photomontages, provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2), include views of the proposed Grid Connection Route.<br>In terms of the comment that effects in Year 1 and Year 15 remain despite the implementation of planting, this is because there is very limited visual mitigation which can be used to screen the pylons which is reflected in the assessment. |
| Boston Borough Council | *Cumulative Effects*<br>The presence of other vertical infrastructure in the wider area (e.g. existing pylons, wind turbines) is noted, but the cumulative visual and landscape impact of introducing an entirely new pylon corridor of this scale has not been robustly addressed. | N | Cumulative effects assessment is presented within **ES Appendix 12-7: LVIA Cumulative Effects** (Doc Ref. 6.3) and summarised within Section 12.11 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). Photomontages reflecting views of the proposed Grid Connection Route within the context of existing infrastructure and |

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| | There is potential for the proposed infrastructure to tip the balance from a rural to semi industrial visual character in some localities, which could have implications for settlement setting and local amenity. | | proposed cumulative overhead lines have been provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2).<br><br>**ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) has considered the landscape and visual effects of the industrialisation of a predominantly rural area and change of use of agricultural land, as set out within **ES Appendix 12-4: Landscape Assessment** (Doc Ref 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3). |
| Boston Borough Council | *Justification and Alternatives*<br><br>At this stage, the PEIR provides limited information on the design rationale for the pylon alignment, tower type, and why alternative connection methods (e.g. undergrounding in visually sensitive areas) were dismissed.<br><br>A clearer justification is required in the ES, particularly for sections of the route that pass close to sensitive receptors or intersect open, exposed fenland landscapes. | N | **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) provides information on the alternatives considered and justification for selecting the design for the Grid Connection Route.<br><br>Following the identification of the Site for the Solar Development Area, work was undertaken to inform the siting of the Grid Connection Route for connecting to the future NGET Weston Marsh Substation. In accordance with the starting presumption for overhead lines set out in paragraph 2.9.21 of NPS EN-5, the routeing assessment was based on the assumption that the Grid Connection Route would comprise an overhead line supported by lattice-style pylons. A comparison of the environmental effects of an underground cable and an overhead line is provided within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). When reviewed in combination with engineering feasibility, constructability and cost considerations, a 400kV overhead line was taken forward as the preferred option over an underground cable.<br><br>Holford Rules provide guidelines to seek to avoid adverse impacts through careful routeing of overhead lines. They formed part of the underlying design principles for the Grid Connection Route and the siting of pylons. Further discussion on how the Holford Rules were followed as part of the siting and design of the Scheme is included within the **Design Approach Document** (Doc Ref. 7.3), submitted as part of this DCO Application. |
| Boston Borough Council | In summary we have significant concerns over the landscape impacts of the proposal and in particular those surrounding the impacts of the proposed overhead pylons and substation infrastructure. We would strongly urge and recommend alternative options are explored if the application was to proceed such as consideration of below ground gables and reduced sizes of substation and other above ground infrastructure. | N | The landscape and visual effects of the Grid Connection Route and associated infrastructure within the existing context have been assessed in detail within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |

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| | | | Photomontages, provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2), include views of the proposed Grid Connection Route.<br><br>The landscape and visual effects of the On-Site Substations and BESS Compound are summarised within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and detailed within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3).<br><br>Mitigation is presented in Section 12.7 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and is secured through the **OCEMP** (Doc Ref. 7.10), **OOEMP** (Doc Ref. 7.11), **ODEMP** (Doc Ref. 7.12 and **OLEMP** (Doc Ref. 7.16).<br><br>**ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) provides information on the alternatives considered and justification for selecting the design for the Grid Connection Route. A comparison of the environmental effects of an underground cable and an overhead line is provided within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). When reviewed in combination with engineering feasibility, constructability and cost considerations, a 400kV overhead line was taken forward as the preferred option over an underground cable.<br><br>Holford Rules provide guidelines to seek to avoid adverse impacts through careful routeing of overhead lines. They formed part of the underlying design principles for the Grid Connection Route and the siting of pylons. Further discussion on how the Holford Rules were followed as part of the siting and design of the Scheme is included within the **Design Approach Document** (Doc Ref. 7.3), submitted as part of this DCO Application. |
| Boston Borough Council | <u>Economy and Social impact</u><br><br>From an economic and social perspective, the Council would like to see the development doing as much as it possibly can to maximise the benefits for local people and businesses for hosting this infrastructure. We also have concerns surrounding the temporary impacts on accommodation by contractors during construction and the possible impacts this could have with the accommodation requirements needed by the council for interim social housing opportunities (i.e. bridging accommodation for people waiting on social housing and the homeless in temporary accommodation).<br><br>Whilst we acknowledge and welcome the proposed Community benefit fund we are concerned about its management and accessibility and would strongly urge that this is clarified and made | N | Potential impacts of the Scheme on local accommodation services within a 60-minute drive are considered in **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1). It is anticipated that construction staff will be housed together in establishments which can accommodate large groups and are also near public transport nodes, where possible, to allow quick access to the Order Limits. It is concluded that the Scheme would have no effect on the tourism sector as a result of using hotel, bed and breakfast, and inns accommodation.<br><br>In terms of the impact of the Scheme on interim social housing opportunities, this has not been assessed as no information has |

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| | transparent as we are aware from other similar sized projects that the community fund is often unattainable for many groups. | | been provided regarding the level of demand the Council is currently using within the hotel/BnB sector, but given the assessment has been made on current occupancy rates, any current demand will have been accounted for in the assessment.<br><br>The Applicant is committed to establishing a Community Benefit Fund which is a voluntary commitment designed to provide additional support and tangible benefits to local communities impacted by the Scheme, rather than a formal element of the DCO application. The exact details of the Community Benefit Fund are not yet established because it is intended to be developed in liaison with residents' representatives, so that it best serves their requirements. |
| Boston Borough Council | <u>Concluding Remarks</u><br><br>Whilst we appreciate many associated stakeholders will comment directly to the Applicant on the project, we wanted to provide a robust and inclusive response by giving all internal stakeholders (and some external with direct affiliation) the opportunity to comment that may not be fully aware of the proposals.<br><br>Whilst some elements of the proposal are clear in its aims, others such as the extent and requirement of above ground structures and chosen routes and substation connection are still to be clarified. It is not until this time that the full effects on Boston Borough Council can be fully appreciated and therefore commented upon. It is only when the full EIA submission is made that comments on specific impacts will be made. | N | The Applicant notes this comment. |
| Boston Borough Council | As stated, we have significant concerns over the landscape impacts of the proposal and in particular those surrounding the proposed overhead pylons and substation infrastructure. We would strongly urge and recommend alternative options are explored if the application was to proceed such as consideration of below ground gables and reduced sizes of substation and other above ground infrastructure. We are also concerned over other aspects discussed earlier in this response such as the accessibility of the proposed Community Development Fund. | N | In terms of the concern regarding the proposed overhead pylons and substation infrastructure, this has been assessed in detail within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1).Photomontages, provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2), include views of the proposed Grid Connection Route. Mitigation is presented in Section 12.7 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and is secured through the **OCEMP** (Doc Ref. 7.10), **OOEMP** (Doc Ref. 7.11), **ODEMP** (Doc Ref. 7.12 and **OLEMP** (Doc Ref. 7.16).<br><br>Following the identification of the Site for the Solar Development Area, work was undertaken to inform the siting of the Grid Connection Route for connecting to the future NGET Weston Marsh Substation. In accordance with the starting presumption for overhead lines set out in paragraph 2.9.21 of NPS EN-5, the |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | | | routeing assessment was based on the assumption that the Grid Connection Route would comprise an overhead line supported by lattice-style pylons. A comparison of the environmental effects of an underground cable and an overhead line is provided within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). When reviewed in combination with engineering feasibility, constructability and cost considerations, a 400kV overhead line was taken forward as the preferred option over an underground cable.<br><br>Holford Rules provide guidelines to seek to avoid adverse impacts through careful routeing of overhead lines. They formed part of the underlying design principles for the Grid Connection Route and the siting of pylons. Further discussion on how the Holford Rules were followed as part of the siting and design of the Scheme is included within the **Design Approach Document** (Doc Ref. 7.3), submitted as part of this DCO Application.<br><br>The Applicant is committed to establishing a Community Benefit Fund which is a voluntary commitment designed to provide additional support and tangible benefits to local communities impacted by the Scheme, rather than a formal element of the DCO application. The exact details of the Community Benefit Fund are not yet established because it is intended to be developed in liaison with residents' representatives, so that it best serves their requirements. |
| Boston Borough Council | We note your community engagement to date however we would welcome future discussions over any proposed community benefits as well as any proposed employment and skills schemes that could be provided to the local workforce as well as any other potential grid infrastructure improvements that may be facilitated by the development. | N | Consultation and engagement with Boston Borough Council will continue following the submission of the DCO Application to ensure its views are considered. The Applicant remains open to suggestions for ideas to integrate into community benefit schemes which could enhance the local environment and communities. |
| Boston Borough Council | This advice is based upon the information available at this time. Please note that the advice is given without prejudice to any future comments made by the Local Planning Authority upon the receipt of further information, whether during or before the submission of a full DCO application.<br><br>We kindly ask that the comments received from stakeholders listed are taken into consideration as you can see there is in part strong feelings about the proposal. | N | The Applicant notes this comment. |
| Boston Borough Council | If you have any queries, please do not hesitate to contact me on the details provided and I would appreciate it if all future correspondence could be made directly to myself as I have been instructed by the Local planning Authority to act on their behalf until the end of the application process. This | N | The Applicant notes this comment. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | will avoid any delays in our response as we have struggled to allow internal consultees sufficient time to get back to us. | | |

## 2.4. Cadent Gas Limited

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Cadent Gas Limited | **Retained Assets:**<br>In respect of existing Cadent infrastructure, Cadent will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus, Cadent has identified the following apparatus within the vicinity of the proposed works:<br>• Low and Medium pressure (below 2 bar) gas pipes and associated equipment. (As a result, it is highly likely that there are also gas services and associated apparatus in the vicinity, these are not shown on plans, but their presence should be anticipated)<br>*Note: No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission.* | N | The Applicant acknowledges Cadent Gas Limited's comments in relation to retained apparatus, potential diversions and the need for appropriate protection of Cadent's assets.<br>The Scheme has been designed to minimise interaction with existing utilities where reasonably practicable. Protective Provisions for statutory undertakers are included within the draft Development Consent Order (Doc Ref. 3.1). In addition, the Applicant is engaging with Cadent Gas Limited regarding their assets, including the scope and wording of any bespoke Protective Provisions required to protect retained apparatus and to govern works in proximity to Cadent infrastructure.<br>At this stage, no diversions of Cadent apparatus are anticipated. However, should any diversions be required, these would be progressed in accordance with Cadent's requirements, including early engagement, agreement of diversion routes, securing of necessary land rights and consents, and the entering into appropriate agreements.<br>The Applicant will continue to engage with Cadent Gas Limited throughout the pre-examination and examination stages to ensure that Cadent's assets and rights are appropriately protected and that any necessary agreements or approvals are progressed in a timely manner. |
| Cadent Gas Limited | **Diversions:**<br>Where diversions of apparatus are required to facilitate the scheme, Cadent will require adequate notice and discussions should be started at the earliest opportunity. Please be aware that diversions for high pressure apparatus can take more than two years to plan and procure materials.<br>Cadent will require the party requesting the diversion works to obtain any necessary land rights, planning permissions and other consents to enable the diversion works to be carried out. Details of these consents should be agreed in writing with Cadent before any application is made. Cadent requires a minimum of C4/ Design study to have been carried out to establish an appropriate diversion route, temporary and permanent land take ahead of any application being made.<br>Where diversions sit outside the highway boundary the party requesting the diversion will be responsible for obtaining at their cost and granting to Cadent the necessary land rights, on Cadent's standard terms, to allow the construction, maintenance, and access of the diverted apparatus. As such adequate land rights must be granted to Cadent (e.g. following the exercise of compulsory powers to acquire such rights included within the DCO) to enable works to proceed to Cadent's satisfaction.<br>Cadent's approval to the land rights powers included in the DCO prior to submission is strongly recommended to avoid later substantive objection to the DCO. Land rights will be required to be obtained prior to construction and commissioning of any diverted apparatus, in order to avoid any delays to the project's timescales. A diversion agreement may be required addressing responsibility for works, timescales, expenses, and indemnity. | | |
| Cadent Gas Limited | **Protection/ protection provisions**<br>Where the Promoter intends to acquire land, extinguish rights, or interfere with any of Cadent's apparatus, Cadent will require appropriate protection for retained apparatus and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. | | |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | Operations within Cadent's existing easement strips are not permitted without approval and will necessitate a Deed of Consent or Crossing Agreement being put in place. Any proposals for work in the vicinity for Cadent's existing apparatus will require approval by Plant Protection under the Protective Provisions/Asset Protection Agreement and early discussions are advised | | |
| Cadent Gas Limited | **Key Considerations**<br>• Cadent has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.<br>• Please be aware that written permission is required before any works commence within the Cadent easement strip and a Crossing Agreement may be required if any apparatus needs to cross the Cadent easement strip.<br>• The below guidance is not exhaustive, and all works in the vicinity of Cadent's asset shall be subject to review and approval from Cadent's plant protection team in advance of commencement of works on site. | N | The Applicant notes these comments. |
| Cadent Gas Limited | Geneal notes on pipeline safety:<br>• You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and Cadent's specification for Safe Working in the Vicinity of Cadent High Pressure gas pipelines and associated installations - requirements for third parties GD/SP/SSW22. Digsafe leaflet Excavating Safely - Avoiding injury when working near gas pipes. There will be additional requirements dictated by Cadent's plant protection team.<br>• Cadent will also need to ensure that our pipelines remain accessible throughout and after completion of the works.<br>• The actual depth and position must be confirmed on site by trial hole investigation under the supervision of a Cadent representative. Ground cover above our pipelines should not be reduced or increased.<br>• If any excavations are planned within 3 metres of Cadent High-Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a Cadent representative. A safe working method agreed prior to any work taking place to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline. | N | The Applicant notes these comments. |
| Cadent Gas Limited | • Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with Cadent's Plant Protection team is essential: | N | The Applicant notes these comments. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | ▪ Demolition<br>▪ Blasting<br>▪ Piling and boring<br>▪ Deep mining Surface mineral extraction<br>▪ Landfilling<br>▪ Trenchless Techniques (e.g. HDD (Horizontal Directional Drilling), pipe splitting, tunnelling etc.)<br>▪ Wind turbine installation<br>▪ Solar farm installation<br>▪ Tree planting schemes<br>• Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.<br>• The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.<br>• The type of raft shall be agreed with Cadent prior to installation.<br>• No protective measures including the installation of concrete slab protection shall be installed over or near to the Cadent pipeline without the prior permission of Cadent.<br>• Cadent will need to agree the material, the dimensions and method of installation of the proposed protective measure.<br>• The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to Cadent.<br>• A Cadent representative shall monitor any works within close proximity to the pipeline. | | |
| Cadent Gas Limited | New Service Crossing:<br>• New services may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.<br>• Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.<br>• A new service should not be laid parallel within an easement strip<br>• A Cadent representative shall approve and supervise any new service crossing of a pipeline.<br>• An exposed pipeline should be suitable supported and removed prior to backfilling | N | The Applicant notes these comments and confirms the Scheme would cross the existing pipeline with new services. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | • An exposed pipeline should be protected by matting and suitable timber cladding<br>• For pipe construction involving deep excavation (<1.5m) in the vicinity of grey iron mains, the model consultative procedure will apply therefore an integrity assessment must be conducted to confirm if diversion is required | | |

## 2.5. Crowland Parish Council

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Crowland Parish Council | Climate change is an important issue: Strongly agree.<br>Energy security is an important issue: Strongly agree.<br>Moving away from fossil fuels is important: Neutral.<br>The UK needs more renewable energy: Agree.<br>The UK needs more energy storage: Agree.<br>Please tell us your views on solar energy: Support.<br>Please let us know the reasons for your responses and any other comments you have: See comments.<br>Based on the information presented as part of our stage two consultation, how supportive are you of our proposals for Meridian Solar?: I am neither supportive nor unsupportive. | N | The Applicant notes these comments. |
| Crowland Parish Council | In principle the Council objects to the industrialisation of the countryside from this proposal and particularly when one considers the cumulative effect of vast areas of PV panels, some in place some planned, pylons associated with this proposal and two or three routes of even larger pylons already planned to transmit power to other areas of the country through South Holland. What is referred to as a small percentage of land to be lost together with the cumulative effect of other similar projects and feed for biomass renewable energy production results in a significant acreage of land being lost to food production endangering food security into the future. No evaluation has been undertaken to understand the amount of land already and potentially out of food production. | N | The UK Government has identified through its energy policy, most recently in the National Policy Statement (NPS) EN-1[3] and NPS EN-3[4], that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure in the UK, including solar technology. Developing the Scheme at its proposed size will be an important contribution to meeting this need.<br>The LVIA has considered the landscape and visual effects of the industrialisation of a predominantly rural area and change of use of agricultural land, as set out within **ES Appendix 12-4: Landscape Assessment** (Doc Ref 6.3) and summarised within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1).<br>The Cumulative Effects section within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) considers the cumulative impact of the Scheme and other proposed solar schemes in Lincolnshire on loss of BMV land and food production which concludes there would be no impact on food security. |

[3] DESNZ (2025). Overarching NPS for Energy (NPS EN-1). Available at: https://assets.publishing.service.gov.uk/media/6915ba42bc34c86ce4e6e726/overarching-national-policy-statement-for-energy-en-1-web-accessible.pdf [Accessed 28/11/2025]
[4] DESNZ (2025). NPS for Renewable Energy Infrastructure (NPS EN-3). Available at: https://assets.publishing.service.gov.uk/media/6915b78bbc34c86ce4e6e71f/national-policy-statement-for-renewable-energy-infrastructure-en-3-web-accessible.pdf [Accessed 28/11/2025]

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
|---|---|---|---|
| Crowland Parish Council | The effect of the likely construction traffic will potentially be overwhelming for Crowland. The use of Cloot Drove from the south is unacceptable particularly as an alternative temporary access is possible from Spalding Road. In event of permission being given an enforceable traffic management scheme, ensuring traffic is kept to a minimum in the town, should be a conditional requirement with contact details, including telephone numbers, being widely available. | Y | **ES Chapter 15: Traffic and Access Chapter** (Doc Ref. 6.1) sets out the proposed construction routing (see **ES Figure 15-3** (Doc. Ref. 6.2)). Following statutory consultation, the proposed construction routing has been revised, so that no HGV routes pass through Crowland via Cloot Drove. Instead, an access has been provided from Spalding Road.<br><br>The **Outline CTMP** (Doc. Ref. 7.13) provides further information on the proposed construction traffic management during the construction phase. Appropriate routing of vehicles and HGVs will be adopted to minimise the impact on more sensitive and rural roads. This approach was discussed and agreed with the LHAs in the Transport scoping meeting in September 2025. Construction traffic will adopt the most appropriate routes to and from the Scheme via the A16 and A151 for the Grid Connection Route, with internal movements undertaken via internal access tracks to reduce the movements (other than crossing) on more rural/ sensitive roads (where practical). |
| Crowland Parish Council | What types of projects/sectors should community benefit funds be targeted to?: Capital (new villages halls)<br><br>What types of projects/sectors should community benefit funds be targeted to?: Capital projects for new, improvement, replacement of existing public buildings that are for the benefit/use of the community. Relief from energy costs for running public properties.<br><br>How would you like community benefit funds to be managed/administered?: Through relevant parish councils. Those parish council impacted should be consulted and make recommendations. | N | The Applicant notes this comment and confirms that it is currently investigating how a Community Benefit Fund could be managed and delivered independently.<br><br>Once the Scheme is operational and the Community Benefit Fund is established, funds will be available for recommendations on where money could be used. |
| Crowland Parish Council | Community Benefit - Whilst it does not form part of the actual application the council welcomes the enhanced proposals concerning community benefit. The latest indicated sum is much improved from the original proposals but should be further enhanced. As it is not a compulsory element some form of agreement needs to be in place to ensure that in the event of the application being granted provision of the fund would be guaranteed. The sum agreed should be index linked and made available in proportion to the area to be developed in each parish affected. However, there should be a clause to allow virement with all parties' agreement to enable major projects to be assisted where necessary. Annual under spend should not be subject to claw back but retained and invested for future projects. As they are an established elected body which has been around for a long time and are likely to continue to exist any administration body should include parish councils. A wide range of interests and organisations should be eligible for consideration for funding. Consideration should be given to assisting public buildings with energy costs as part of any future community benefit arrangement. | N | The Applicant notes this comment and confirms that it is currently investigating how a Community Benefit Fund could be managed and delivered independently.<br><br>Once the Scheme is operational and the Community Benefit Fund is established, funds will be available for recommendations on where money could be used.<br><br>The Applicant also confirms that it would be open to further engagement regarding the delivery of the Community Benefit Fund. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Crowland Parish Council | Please let us know how you heard about the consultation by ticking one or more of the following boxes: Received an email from Meridian Solar<br><br>Did you attend our in person consultation events or watch an online information presentation?: Yes, only in person<br><br>How informative did you find our consultation events and/or our consultation materials?: Quite informative<br><br>Please rate the information included as part of this consultation in terms of how clearly it was presented and how easy it was to understand: Good | N | The Applicant notes this comment. |

## 2.6. Deeping St. James Parish Council

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Deeping St. James Parish Council | After looking at the information provided, Deeping St James Parish Council would like to object to this proposal at land north of Crowland and east of Spalding, due to loss of high-quality arable land. | N | The Applicant notes this comment. The impact of the loss of high-quality arable land has been assessed in **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1). The Cumulative Effects section within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) considers the cumulative impact of the Scheme and other proposed solar schemes in Lincolnshire on loss of BMV land and food production which concludes there would be no impact on food security. |

## 2.7. Environmental Agency

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Environment Agency | Thank you for consulting us on the Preliminary Environmental Information Report (PEIR) for Meridian Solar.<br><br>Further information is required for the Environment Agency (EA) to provide a definitive response to relevant environmental impacts. This is important so we can provide the best possible advice to the Planning Inspectorate (PINS). It is strongly recommended that any further reports, statements or surveys that require our review and/or agreement are submitted as soon as possible to resolve any issues before the Development Consent Order (DCO) is submitted.<br><br>We look forward to continuing to work with you as the detailed proposals continue to develop, and to reviewing and providing advice on relevant supporting documents as these are generated. If you have any questions about any of our advice, please contact us. | N | The Applicant notes this comment. |
| Environment Agency | Any requests to disapply any permits or consents should be sent to us in writing as soon as possible, to allow us sufficient time for their consideration (minimum 6 months). Please note this response does not represent our final view in relation to any future DCO, or any environmental permit applications made to us. Our final views will be based on all relevant information including applications and guidance available at the time of submission. Our advice has been provided under our chargeable service agreement: ENVPAC/1/NIT/00030. | N | The Applicant has been engaging with the EA on the disapplication of relevant permits/consents and their management via protective provisions. Those negotiations remain ongoing at the point of application. |
| Environment Agency | **Document Reference : PEIR Vol1 Chapter 8. Table 8-5 Magnitude of impact page 17**<br><br>**Issue**<br><br>Flood risk impact categorisation could be inappropriate for the "negligible" classification<br><br>In terms of Flood Risk, the table states that 'negligible' would constitute no consequences in terms of flood risk. The table then states that change in flood risk causes more frequent inconvenience and triggering of emergency response measures but does not result in increased risk of damage to property and infrastructure. The EA considers that more frequent tiggering of emergency response measures and inconvenience would not be deemed a 'negligible' impact.<br><br>**Impact**<br><br>Underestimation of impact of flood risk<br><br>**Solution**<br><br>Please clarify if the statement "Change in flood risk causes more frequent inconvenience and triggering of emergency response measures but does not result in increased risk of damage to property and infrastructure" is deemed a negligible impact. Such impacts are more likely to fall within the minor impact category. Negligible in the context of flood risk would be no discernible impacts on flood risk. | N | Table 11-5 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) sets out the updated definition for negligible impact. Negligible impact is considered to result in impact on attribute, but of insufficient magnitude to affect the use or integrity. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Environment Agency | **Document Reference : PEIR Volume 1 Chapter 8 Paragraph 8.8.41 page 34**<br>**Issue**<br>This paragraph notes that flood sensitive infrastructure would be elevated above the peak water level associated with breach of defences or pumping station failure during a 1 in 1000 year plus climate change flood event. This is welcomed. This paragraph notes that this may necessitate localised ground raising which has the potential to reduce storage volume within the floodplain<br>**Impact**<br>Evidence is required within the Flood Risk Assessment to demonstrate that the impacts of any ground raising on flood risk would be negligible.<br>**Solution**<br>Whilst there is no expectation to provide floodplain compensation for residual flood risk scenarios such as breaching or pumping station failure, please provide evidence within the flood risk assessment which clearly demonstrates any impacts to third parties which may arise from loss of floodplain. This could be through presenting volumetric calculations or alternatively testing the impact of any ground modifications using the hydraulic modelling which is currently under development. | N | **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3) includes volumetric loss calculations to quantify the minimal floodplain storage displacement associated with the PV panels and solar stations, where these are located within Flood Zone 3b. |
| Environment Agency | **Document Reference : PEIR Volume 1 Chapter 8 : Paragraph 8.8.42 page 35**<br>**Issue**<br>This paragraph notes that the receptors are considered to be of low sensitivity and the magnitude of impact would be negligible on account of the significant extent of floodplain relative to the localised scale of any ground raising. No evidence is presented regarding impact magnitude within the PEIR<br>**Impact**<br>The impacts of flood risk to third parties could be inaccurate or underestimated if a quantitative assessment is not undertaken and presented within the Flood Risk Assessment<br>**Solution**<br>Please provide clear quantitative evidence within the Flood Risk Assessment to demonstrate that the impacts of any ground raising on flood risk would be negligible. Furthermore, please also provide similar supporting quantitative evidence for the solar panel support frames in terms of their impact on flood risk | N | **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3) includes volumetric loss calculations to quantify the minimal floodplain storage displacement associated with the PV panels and solar stations, where these are located within Flood Zone 3b. |
| Environment Agency | **Document Reference: Volume 2 Figure 8-4 Surface Water Flood Risk and Abstraction Locations**<br>**Issue**<br>Potential errors within figure 8-4. The outlines presented look more extensive than the existing (January 2025) and previous Risk of Flooding from Surface Water (RoFSW) mapping outputs for this area. | N | All mapping and figures have been reviewed and updated to ensure consistency with the latest surface water flood risk data and modelling outputs. Figures relating to flood risk are available as **ES Figure 11-3: Fluvial Flood Risk** and **ES Figure 11-4: Surface Water Flood Risk** (Doc Ref. 6.3). |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | **Impact**<br>The assessment of surface water flood risk could be inaccurate<br>**Solution**<br>Confirm if the mapping presented in figure 8-4 is reflective of the RoFSW dataset as the outputs presented don't appear to align with the latest published data in this area (check if this is another dataset, for example the Susceptibility of Flooding from Ground Water dataset?) | | |
| Environment Agency | **Document Reference : PEIR Volume 1 Chapter 8 :**<br>**Issue**<br>The report states that building floor levels would be set at an appropriate freeboard above modelled flood levels but the height of this freeboard has not been specified.<br>**Impact**<br>An insufficient freeboard may be implemented putting flood-sensitive infrastructure at risk.<br>**Solution**<br>We would expect to see a 600mm freeboard between design level and infrastructure. This is a 300mm freeboard to account for modelling inaccuracies and 300mm for blockage risks. | N | **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3) specifies appropriate freeboard allowances that have been confirmed in engagement with the Environment Agency. |
| Environment Agency | **Document Reference : PEIR Volume 1 Chapter 8 :**<br>**Issue**<br>The applicant has not committed to undertaking an assessment of the credible maximum scenario.<br>**Impact**<br>This may cause the development to not be resilient to future flood risk.<br>**Solution**<br>The applicant should undertake an assessment of the credible maximum scenario and implement the necessary resilience. | N | The credible maximum scenario has been assessed as part of the hydraulic modelling for the Site, and the results are included within **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3). |
| Environment Agency | **Document Reference: PEIR Vol.1 Chapter 7 Ch 7.8.4 and Chapter 8:**<br>**Issue**<br>There is no commitment to avoid culverts where new watercourse crossings may be required.<br>**Impact**<br>Culverting can have an adverse effect on aquatic habitat, habitat connectivity, flow regime and flood risk.<br>**Solution** | N | Crossings associated with existing farm tracks will be used, where practicable, to reduce the number of new tracks and crossings. New haul route of stone construction will be required for the overhead line in the Grid Connection Route. For new access crossings, options for culverting and bridge crossings will be considered at detailed design stage. No culverting of main rivers is proposed (there are no main rivers within the Order Limits). Where bridge crossings are provided, Environment Agency's proposed design principles will be applied. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | Include a commitment to avoid culverting of all watercourses wherever possible, and to follow EA best practice to avoid culverts to main rivers.<br>All new crossings should be clear-span bridges in line with the following requirements:<br>• Soffit height of the bridge must be a minimum of 600mm above the 1 in 100yrs + Climate change allowance flood level<br>• All abutments must be set back a minimum 1m from the top of bank and as minimal as possible<br>• Any loss of floodplain due to abutments and ramps will need to be compensated for.<br>All parapets and railings need to be permeable and open as possible with a minimum 100mm spacing. | | For a worst-case assessment, the use of culverts has been assumed. It will be expected that where culverts are necessary, the least impacting design that is reasonably practicable is proposed (e.g. arch rather than box culverts, and box culverts in preference to pipes etc.).<br>Where channel will be lost for a temporary access track crossing, or for a trenched crossing, a pre-works hydromorphological and riparian corridor survey will be undertaken to record channel features and provide the baseline against which reinstatement will be provided. Reinstatement will aim to provide an improved channel form with enhancement works to be carried out (where relevant and appropriate to do so) between 5 and 15 m upstream and downstream of the open trench or access track crossing (within an easement of up to 15 m either side) to ensure the reinstated improved channel form merges into the existing channel form. However, any enhancement would need the permission of the IDBs and be compatible with their current and future management and maintenance requirements.<br>Section 11.8 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) identifies likely significant effects to the water environment. Embedded mitigation for culverts is included in Section 11.7 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). |
| Environment Agency | **Document Reference: PEIR Volume 1 Chapter 2 – The Scheme**<br>**Issue**<br>The schemes discusses both trenched and trenchless crossings of watercourses and there is no clarity regarding which techniques will be used in different circumstances<br>**Impact**<br>Open cut crossing techniques can have adverse impacts on watercourses<br>**Solution**<br>Trenchless techniques should be used under watercourses wherever possible. | N | An indicative crossing schedule has been produced which outlines which crossing techniques will be used at each water crossing location. This is presented in **ES Appendix 2-1 Indicative Watercourse Crossing Schedule** (Doc Ref 6.3). |
| Environment Agency | **Document Reference: Chapter 7, 7.6.7**<br>**Issue**<br>Fish habitat unknown in grid connection corridor.<br>**Impact** | N | Surveys for fish have been scoped out but potential impacts during all phases have been considered within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1) and **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3), as appropriate. The **Outline CEMP** (Doc Ref. 7.10) addresses avoidance of impacts on watercourses |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | There are a number of ditches that network across the site which are hydrologically connected to the River Welland and South Holland Main Drain. European eel are often found in wet ditches and drains that are closely connected to main watercourses. The same applies to juvenile fish that seek refuge from a main watercourse. Furthermore, there are records of river lamprey in the River Welland (Annex II and V species of the Habitats Directive). Juvenile river lamprey are often found within fine sediment substrate associated with ditches/drains connected to main watercourses. By not including fish in the subsequent EIA, there is the risk that impacts on fish from construction, operation and decommissioning will be missed.<br>**Solution**<br>The EIA should aim to assess the fish baseline conditions through a desk study and habitat assessment within the red line boundary of the grid corridor. This will enable an assessment of impact-pathways on fish from all development phases of the scheme. Such impacts could include open cut trenching, culverting, crossing of watercourses, increased pollution and noise disturbance.<br>**Additional narrative/explanation:**<br>Comments were raised at scoping and have yet to be addressed. The desk study should include freely available EA fish survey data, available at EA Ecology & Fish Data Explorer. | | ensuring habitat integrity for notable fish species such as European eel and river lamprey. |
| Environment Agency | **Document Reference: Chapter 7 Section 7.2**<br>**Issue**<br>PEIR omits reference to Salmon and Freshwater Fisheries Act (SAFFA) and Eels Regulations.<br>**Impact**<br>Failure to consider SAFFA and Eels Regulations risks non-compliance and inadequate protection for fish species including eel.<br>**Solution**<br>Address SAFFA and Eels Regulations in the assessment to ensure legal compliance and effective mitigation of impacts to connected watercourses. | N | The **Outline CEMP (Doc Ref. 7.10)** includes measures to avoid impacts on notable fish species such as European eel and river lamprey by ensuring habitat integrity in line with SAFFA and Eels Regulations. |
| Environment Agency | **Document Reference: Chapter 7**<br>**Issue**<br>Further information is required to support the conclusion that there will not be any significant effects on aquatic habitats and associated biodiversity (including aquatic local wildlife sites), especially regarding impacts from watercourse crossing points.<br>**Impact**<br>In the absence of adequate baseline information, the conclusion of no significant impact/ WFD compliance cannot be supported. | N | As stated within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) measures are included within the **Outline Construction Environmental Management Plan** (OCEMP) (Doc. Ref. 7.10) to minimise impacts through trenchless methods where practicable, maintaining connectivity for aquatic species where crossings are unavoidable, and pre-works hydromorphological surveys to inform extent of impacts and remediation. |

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| | **Solution**<br>We note the intention that the baseline will continue to evolve as further surveys are undertaken and will be presented in full within the ES. Baseline surveys should be used to inform impact assessments (including impact of watercourse crossings) and also to inform Biodiversity Net Gain proposals. Assessment of habitats should include river/ ditch condition assessments and consider aquatic species including macrophytes and macroinvertebrates. Provide clarity regarding the design of watercourse crossing points, taking into account the EA's view that culverts should be avoided. | | |
| Environment Agency | **Document Reference: Chapter 7 Table 7-10 and Paras 7.4.31 and 7.8.13**<br>**Issue**<br>Ditch habitats were dry at the time of surveying, and seasonal wetness was not assessed therefore potential water vole habitat may be under recorded. Beyond the provision of a 100m buffer zone around crossing points, there is a lack of detail regarding proposed measures to reduce disturbance to watervoles<br>**Impact**<br>In the absence of data regarding seasonal wetness of ditches and detail regarding mitigation measures, there is a risk that any water vole mitigation measures may be unsuccessful.<br>**Solution**<br>Ensure all ditches across the site are assessed for seasonal wetness to confirm the water vole survey extent captures all potential habitats and contributes towards data relating to potential receptor site suitability, if required. Measures set out within CEMP would reduce disturbance to a level that is not significant. | N | A detailed assessment of ditch habitats including seasonal wetness and consideration of potential water vole habitats has been included within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). The **Outline CEMP** (Doc Ref. 7.10) includes measures to ensure effective mitigation and reduce disturbance, ensuring compliance and successful implementation. |
| Environment Agency | **Document Reference: Chapter 7 and chapter 8 (Hydrology, Flood Risk and WFD)**<br>**Issue**<br>There is an inconsistency regarding intended water course stand-off distance. E.g. 7.7.1 states: 'This [embedded mitigation] includes the retention of drainage ditches with a minimum 10m stand-off. 8.7.2 States: 'With the exception of potential cable crossings and watercourse crossings e.g. bridge/culvert no infrastructure will be located within 9m of watercourses'.<br>**Impact**<br>Insufficient riparian buffers may hinder the free movement of riparian mammals and may not allow for the natural river corridor to be maintained.<br>**Solution**<br>Ensure documentation consistently refers to 10m. Note that encroachment into 10m riparian zone of rivers, streams and canals would need to be considered within Biodiversity Net Gain assessment.<br>**Additional narrative** | N | **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref 6.1) has been updated to consistently refer to the 10m stand-off distance, thereby ensuring compliance with the Biodiversity Net Gain assessment and mitigation hierarchy to achieve effective protection of watercourses and surrounding ecologies. |

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| | During the construction phase, temporary construction compounds within 15m of watercourses should be screened with fencing adjacent to the watercourse and work lighting should be positioned to avoid light-spill onto sections of the watercourse | | |
| Environment Agency | **Document Reference: Chapter 7 Para.7.9.3**<br>**Issue**<br>There is a lack of detail regarding the proposed specific enhancement measures for water courses, and no information regarding when/where this detail will be put forward.<br>**Impact**<br>Lack of certainty regarding what enhancements, such as for Biodiversity Net Gain, may be delivered, and how these will be secured in the DCO.<br>**Solution**<br>Ensure specific measures form part of the DCO submission. Ensure that proposed measures take into account the strategies set out in relevant guidance: *Mayer, L., Moodie, I., Carson, C., Vines, K., Nunns, M., Hall, K., Redding, M., Sharman, P. & Bonney, S. (2017) Good Ecological Potential in Fenland Waterbodies: A Guide to Management Strategies and Mitigation Measures for achieving Good Ecological Potential in Fenland Waterbodies.*<br>Ensure enhancement measures align with both WFD measures and the Local Nature Recovery Strategy (LNRS) to deliver multiple environmental benefits. | N | As set out within the **OCEMP** (Doc Ref. 7.10), a Water Framework Directive (WFD) Mitigation and Enhancement Strategy will be produced to accompany the detailed CEMP. This will be informed by a pre-works hydromorphological and riparian corridor survey to be undertaken pre-construction to record channel features/ habitats and provide the baseline against which reinstatement will be designed. Any reinstatement would be undertaken between 5 and 15m upstream and downstream of the watercourse crossings, subject to agreement with the Internal Drainage Boards.<br>The **Draft DCO** (Doc Ref. 3.1) Schedule 2 Requirement 8 includes a commitment for the Scheme to achieve BNG in accordance with the **BNG Report** (Doc Ref. 7.9) and the **OLEMP** (Doc Ref. 7.16). Habitat management measures aimed at improving biodiversity through optimal plant species selection and management practices are detailed in **the OLEMP** (Doc Ref. 7.16). |
| Environment Agency | **Document Reference: Chapter 8, Section 8.6.22**<br>**Issue**<br>North Level Main Drain (ID: GB205032050395) is proposed to be screened out of WFD assessment – with the reasoning that Land Parcel C and the nearest crossing point are both located upstream (north) of this water body and are unlikely to impact the water body. However, there is the potential risk that contaminated drainage from Land Parcel C and from the crossing point could move downstream and affect the waterbody<br>**Impact**<br>Risk of water quality and morphological impacts to a WFD waterbody have been underestimated.<br>**Solution**<br>Check whether "upstream" is the correct terminology here. Re-consider the scoping-out of this watercourse from the WFD screening assessment. | N | There are no crossing points located within the land parcel closest to North Level Main Drain WFD water body. Therefore, it appropriate for it to be scoped out as it is highly unlikely that there are any impacts that would propagate downstream and impact on the North Level Main Drain.<br>An assessment against WFD requirements (including ensuring no deterioration or prevention of future improvement in WFD elements of water bodies) is provided in **ES Appendix 11-2: Water Framework Directive Assessment** (Doc Ref 6.3). This includes justification of screening of WFD water bodies. |
| Environment Agency | **Document Reference: Chapter 8, Table 8-8**<br>**Issue** | N | Terminology has been updated to 'Not Good' in reference to Hydromorphological Supporting elements for South Holland Main Drain and for Moulton River where relevant in **ES Chapter 11:** |

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| | Incorrect terminology ('Supports Good') used in reference to Hydromorphological Supporting elements for South Holland Main Drain and for Moulton River.<br><br>**Impact**<br><br>Use of old terminology may imply that the hydromorphology of a watercourse does not need improvement and that no actions need to be undertaken to achieve uplift.<br><br>**Solution**<br><br>Edit document to reflect the updated terminology.<br><br>**Additional narrative**<br><br>A recent change in terminology from "Supports Good" to "Not High" has been made to the Hydromorphological Supporting Elements/Regime. This is due to the "Supports Good" terminology implying that the condition of the river was "OK" and nothing needed to be done to improve the hydromorphology. The new term "Not High" seeks to encourage actions to improve/uplift the quality of the hydromorphology. | | **Hydrology and Flood Risk** (Doc Ref. 6.1) and **ES Appendix 11-2: WFD Assessment** (Doc Ref 6.3). |
| Environment Agency | **Document Reference: PEIR Ch 8, Para 8.8.48**<br><br>**Issue**<br><br>The use of culverts for watercourse crossings has been recognised as a worst case in terms of impacts but has not been ruled out.<br><br>**Impact**<br><br>The installation of culverts or other in-channel modifications may negatively impact hydromorphic and biological quality elements of the WFD assessment<br><br>**Solution**<br><br>The assessment recognises that a culvert would represent the worst case in terms of impacts on the water bodies. Proposals should avoid culverts for new crossings and should seek to enhance the watercourse by replacing any existing culverts/pipe crossings with open span crossings (or with 3-side/arched culverts as a minimum).<br><br>**Additional narrative**<br><br>The following are general guiding principles to consider when designing watercourse crossings to avoid negatively affecting geomorphology and natural processes:<br><br>• Avoid unnecessary interference with natural processes. For instance, encourage use of trenchless techniques such as Horizontal Directional Drilling (HDD) to minimise the likelihood of cables entering the water environment. | N | The use of culverts has been assessed as the worst-case scenario and appropriate mitigation outlined should they be included in the final detailed design. Likely significant effects from the use of culverts are described in Section 11.8 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). Culverts cannot be ruled out in their entirety, until detailed design is progressed with the construction contractor appointed for the Scheme. Measures are included within the **Outline CEMP** (Doc Ref. 7.10) to limit impacts associated with the construction of culverts including a WFD Mitigation and Enhancement Strategy.<br><br>Furthermore, EA's guiding principles have been referred to in the preparation of the DCO Application and these have been reflected in the preparation of the **Design Parameters** (Doc Ref. 7.4), for example through the specification of a minimum depth for trenchless crossings underneath watercourses and the design principles for culvert and bridge access track crossings.<br><br>The Applicant considers that the assessment presented within **ES Appendix 11-2: Water Framework Directive Assessment** (Doc Ref. 6.3) and **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) complies with the notes on the assessment and watercourse sensitivity presented by the EA. Determination of watercourse sensitivity has been informed by a walkover survey. |

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| | • Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.<br>• Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by future river movement, becoming an impediment to natural processes.<br>• Consider opportunities to deliver WFD mitigation measures as part of the design.<br>• Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration.<br>**Notes:**<br>i. WFD applies to all surface waterbodies, not just those designated for monitoring purposes.<br>i. Small watercourses and WFD – watercourses with a catchment less than 10km/2 connected to a downstream WFD waterbody take the classification of that waterbody.<br>i. BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric.<br>*[BNG guidance is mentioned here because our [EA] usual easement for structures, operations, launch pits is to be at least 8m away from the watercourse bank or landward base of fluvial defence structure/embankment (16m if defence structure is for tidal purposes). As stated in the note above, BNG watercourse metric considers anything within 10m of banktop to be encroaching on the watercourse.]*<br>• Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WFD Assessment to the satisfaction of the EA.<br>• Any infrastructural developments on river/floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.<br>• Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook (Flood Estimation Handbook (FEH) \| UK Centre for Ecology & Hydrology (ceh.ac.uk). Therefore, any infrastructure developments should also take some account of the likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. 'a flood-rich epoch') over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/behaviour). | | |

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| | • If river crossings (bridges, culverts, and buried cables) are required as part of the development, we [EA] would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.<br><br>Further guidance in regard to river crossings can be found in the following document:<br><br>SEPA, 2010. Engineering in the water environment: good practice guide River crossings Second edition. SEPA<br><br>**Water course sensitivity**<br><br>• Care should be taken by applicants when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.<br><br>• WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated.<br><br>• Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment. | | |
| Environment Agency | **Document Reference : PEIR Vol I Chapter 2 Section 2.14.1, Chapter 8 Section 8.5.3**<br><br>**Issue**<br><br>Insufficient detail is presented about the risks posed by retaining below ground cables following decommissioning.<br><br>**Impact**<br><br>Decommissioning workers may not follow intentions correctly if information is missing. Cable breakdown over long periods of time could pose a risk to land quality and controlled waters.<br><br>**Solution**<br><br>Confirm extent of cables to be left in situ. Present a study of the risks of leaving them in-situ compared to total removal, with consideration to ground conditions and controlled waters. Consider and present a plan for the worst-case scenario for all receptors.<br><br>**Additional narrative** | N | The **Environmental Statement** (Doc Ref. 6.1) assesses decommissioning on a conservative basis, including the complete removal of underground cables, to ensure that the reasonable worst-case effects are appropriately considered.<br><br>As stated within **ES Chapter 2: The Scheme** (Doc Ref. 6.1), the final approach to underground cable decommissioning would be determined at the time of decommissioning, having regard to Government policy, best practice and landowner agreement. While complete removal has been assessed within the ES, it is recognised that, subject to agreement with landowners and regulators, cables may be left in situ where this represents the most environmentally acceptable option, as this avoids disturbance to overlying land, habitats, and watercourses.<br><br>If the cables are agreed to be removed, 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 up the entire length of the cable route. The decommissioning approach |

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| | The Applicant states: "It is assumed that any below ground infrastructure would be left in situ following decommissioning, subject to best industry practice, obligations to landowners and the relevant statutory requirements."<br><br>Many developments propose a depth below which cables will be left in-situ. This could affect subsequent use of the land. Ploughing or other disturbance of cables left in-situ could result in micro-plastics and metals contaminating the land and groundwater.<br><br>The list of effects given in PEIR Sections 8.8.52 to 8.8.55 does not include reductions in water quality due to cables being left in situ and degrading over time. We consider this should be assessed.<br><br>The applicant has stated an intention to consider worst case scenarios in this report (PEIR Chapter 2, Section 2.5.10 and elsewhere). If total removal of all cables and underground infrastructure is the worst case, then this should be included. Given that it is not proposed, we consider that is likely to be an undesirable case but cannot be ruled out.<br><br>We recommend that the applicant makes allowance to consider best practice guidance and legislation at the time of decommissioning, as the current proposals may not be considered suitable then. It may be prudent to design with decommissioning in mind, as the most practical method of construction could mean the most effective decommissioning technique becomes less viable. | | will be further refined through the detailed Decommissioning Environmental Management Plan (DEMP), secured through the DCO, and will be prepared in accordance with the standards and guidance at the time of decommissioning, including consideration of land quality and controlled waters. |
| Environment Agency | **Additional Points for consideration**<br><br>**Piling and foundations**<br><br>No foundation design information is provided for the proposed overhead line towers in the Grid Connection Corridor and Inter Array Areas, or for security infrastructure such as CCTV and fencing.<br><br>It is assumed that foundations for pole mounted CCTV cameras and fencing would be similar to that for the PV Panel Arrays, and that overhead line towers would be piled or established on concrete pad foundations extending to depths similar to that for the proposed BESS and On-Site Substation Compounds. | N | Assessment assumptions for the foundation design for the proposed Grid Connection Route, Overhead Inter-Array Connection and security infrastructure are provided **ES Chapter 2: The Scheme** (Doc Ref. 6.1).<br><br>With regard to the Grid Connection Route, each leg of the pylon would be supported by a foundation. Depending on ground conditions, this may comprise either a pad and column foundation or a piled foundation. Worst-case design assumptions used in the ES for both types of foundations are as follows (to be confirmed following further ground investigation and detailed design):<br><br>• Pad and column foundation (for each leg)– 4.3m x 4.3m footprint, 4.8m deep.<br><br>• Piled foundation (for each leg) – 4.6m x 4.6m concrete pad up to 2.1m deep and 8 piles with 60mm diameter up to 20m deep.<br><br>For the Overhead Inter-Array Connection, this states that the poles would be installed to a maximum depth of 2.5m. The diameter of the poles would be up to 500mm.<br><br>In terms of pole mounted cameras and fencing these would be directly driven into the ground using a standard post driver with |

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| | | | no excavation of foundations. 'Concreting in' of posts would be used in limited circumstances such as tension posts and/or corners. |
| Environment Agency | **Use of PFAs**<br>We strongly recommend that all solar panels are PFAS-free. Some solar panels are treated with a PFAS coating. PFAS is not mentioned in PEIR. If panels containing PFAS are used, we suggest that there is consideration of this is required in the OEMP and DEMP.<br>For example, if PFAS coating is damaged there is a risk of persistent chemicals entering the natural environment during heavy rainfall, washing, maintenance, and removal.<br>The OEMP should also incorporate measures to minimise the risk of panel coatings becoming damaged via 'thermal shock' such as if cleaned whilst at a high temperature due to prolonged exposure to sunlight. | N | There will be no pollution risk from runoff as solar PV panels do not contain any liquid (hazardous or not) that could contaminate rainwater. Where materials containing per-and polyfluoroalkyl substances (PFAS) are used, they will be embedded inside sealed layers that are not susceptible to leaching. These are chemically inert solid fluoropolymers and would not contaminate rainwater. As set out within the **OOEMP** (Doc Ref. 7.11), solar PV panels are required to be cleaned once a year and would be subject to regular inspection and repairs. This will use clean water with no added chemicals, sourced from local, third party, commercial potable water suppliers. |
| Environment Agency | **Panel Cleaning methodology**<br>There is no detail regarding the proposed methodology for cleaning the PV Panel Arrays during the operational phase. We urge the Applicant to consider panel cleaning using clean deionised water only, at intervals selected to prevent excessive use of water. The use of cleaning products (chemicals) may also cause damage to, and/or void the manufacturer's warranty for, PV panels. | N | The **OOEMP** (Doc Ref. 7.11) provides details of water use during the operational phase. This confirms that Solar PV Panels will be cleaned once a year using clean water with no additional chemicals. |
| Environment Agency | **Revised Source Protection Zones**<br>The hydrogeological setting of the site has been established by reference to Source Protection Zones (SPZs) as shown on Defra's MAGiC Map. The Environment Agency's SPZ were revised in April 2025, with some SPZ boundaries altering, and this updated information is not presently shown on the MAGiC mapping system. SPZ shapefiles can be accessed at the following location: Source Protection Zones [Merged]. Note that our data do not show the presence of any SPZ within 1km of the Proposed Development boundary. | N | The revised April 2025 SPZ boundaries were used in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). It is agreed that there are no SPZ within 1km of the Order Limits. |
| Environment Agency | **Historic Landfill sites records**<br>The distances given to historic landfill sites from the PV Area and Inter-Array Area are inconsistent with our records.<br>The PRA lists five historic landfill sites within 250m of the PV Area and Inter-Array Areas. Two of these landfills (Drain adjacent to Lutton Gate Road and New River Drove) are situated between 250m and 500m of the PV and Inter-Array Areas, not within 250m. In addition, Parsons Lane landfill site (532200E, 313400N), which is located within 250m, is not listed at all, although this is shown on Figure 4-1.<br>Only two historic landfill sites (Holbeach Drove Gate and Mole Drove Farm) are listed within 501m and 1km of the PV and Inter-Array Areas in the report. However, our records indicate Peacock House | N | **ES Appendix 5-4: Contaminated Land Assessment** (Doc Ref. 6.3) has been updated to include the landfill sites mentioned in the comment. The updates do not change the conclusions of the preliminary risk assessment. |

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| | (533600E, 311600N), Land off Little Dog Grove (533900E, 317000N) landfill sites are also located within 501m and 1km of this area.<br><br>The report also lists landfills within 250m and between 500m and 1km from the PV Area and Inter-Array Area but omits discussion of the 250m to 500m search area. | | |
| Environment Agency | **Document Reference: PEIR Vol.1 Ch8 para 8.8**<br><br>**Issue**<br><br>Further detail is required regarding mitigation of potential risks to water quality arising from the development, operational and decommissioning phases of the development.<br><br>**Impact**<br><br>There is potential risk of impacts to water quality arising from all phases of the development<br><br>**Solution**<br><br>Table of Commitments should be secured through Outline Environmental Management Plans and supporting topic-specific plans, to be submitted as supporting documents with the DCO. We request early engagement in the preparation of these Outline Plans prior to submission. Topics should include, but not be limited to:<br><br>• Management of surface water drainage from compounds<br>• Management of Fire water from BESS and substation compounds<br>• Foul effluent treatment and discharge (NB Any foul sewage discharge may require an environmental permit.)<br>• Emergency Response Plan – Management of potentially polluting substances and plant, to include a fuel/chemical spill plan and spill kit provision<br>• Design and management of trenchless crossings to ensure protection of water quality and watercourse integrity, including Bentonite Breakout Pan.<br><br>**Additional narrative**<br><br>The following measures are included for the construction and decommissioning phases, and should also be incorporated during the operational phase where fuels and other potential chemical pollutants are used and stored (i.e. substations and BESS Compounds):<br><br>• Best practice working methods to prevent both water pollution and adverse impacts upon the surface water drainage regime.<br>• Appropriate storage of hydrocarbons and petrochemicals in accordance with Control of Substances Hazardous to Health (COSHH) Regulations 2002 and Control of Pollution (Oil Storage) (England) Regulations 2001 | N | The mitigation of potential risks to water quality arising from the construction, operation and decommissioning phases of the Scheme have been summarised in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). Embedded mitigation, including mitigation of the potential risks to water quality is included within Section 11.7 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1).<br><br>Engagement with the EA on the key impacts and proposed mitigation associated with the Scheme has been ongoing throughout the pre-application stage.<br><br>The Outline Plans referred to are contained within the following documents:<br><br>• **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3); and<br>• **Outline Battery Safety Management Plan** (Doc Ref. 7.18).<br><br>In terms of foul effluent treatment and discharge, **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) incorporates sustainable drainage systems to manage surface water runoff. No connection will be made into the foul sewer network, and no discharges to the public foul system are proposed.<br><br>The Emergency Response Plan and design and management of trenchless crossings including a Bentonite Breakout Plan are to be prepared post-DCO consent, as set out within the **OCEMP** (Doc Ref. 7.10).<br><br>In terms of site runoff and chemical spillages from maintenance activities as stated in the **Outline OEMP** (Doc Ref. 7.11) the detailed OEMP(s) will include measures to manage the risk of pollution from any spillages and maintenance activities, such as correct storage in appropriately bunded areas of any hazardous materials and appropriate, regular inspection and maintenance of all equipment on-site. This may include additional measures to control, intercept and treat site runoff from working areas, any excavations and temporary access tracks, as well as the |

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| | • Appropriate storage of hydrocarbons and petrochemicals in accordance with Control of Substances Hazardous to Health (COSHH) Regulations 2002 and Control of Pollution (Oil Storage) (England) Regulations 2001<br><br>These measures should be included in the Operational Environmental Management Plan.<br><br>It is good practice to carry out baseline monitoring of the watercourses, upstream and downstream monitoring during construction, and complete some postconstruction sampling to demonstrate the good site management practices have been effective in the protection of the water environment. | | application of good practice measures to manage the risk of chemical spillages (e.g. fuel) during the works. |
| Environment Agency | **Document Reference: PEIR Volume I Chapter 2 Section 2.6.14 and Table 2-1, Chapter 8 Section 8.5.7**<br><br>**Issue**<br><br>The report describes the proposed implementation of automatic fire detection and fire suppression systems at BESS Containers and the placement of above ground water storage tanks at each of the BESS and On Site Substation Compounds. In the event of an incident fire water is stated to be contained within the attenuated subbase of the gravel compound by a penstock valve, to be pumped out and disposed of off-site.<br><br>The Section does not clearly identify that the gravel sub-base at BESS and On-Site Substation Compounds would be lined with an impermeable base or layer to prevent loss of potentially contaminated fire water to ground and would be of sufficient storage capacity to contain the anticipated volumes of fire water.<br><br>**Impact**<br><br>Potentially contaminated fire water could be released to the environment in the event of an incident and could impact controlled waters.<br><br>**Solution**<br><br>The Applicant should clearly identify all the design measures to mitigate loss of fire water from BESS and On-Site Substation Compounds. It is anticipated that this will be established in the proposed Drainage Strategy.<br><br>**Additional narrative**<br><br>Information within the Drainage Strategy for BESS and On-Site Substation Compounds should include, but not be limited to:<br><br>• A detailed drainage plan which demonstrates, in the event of an emergency, that contaminated firewater can be adequately contained within the site to ensure that there is no discharge of polluted water to ground or surface water bodies.<br><br>• The scheme should include an impermeable base or layer beneath the battery unit compound to ensure infiltration beneath the site can be controlled. | N | The proposed attenuation basin located in the BESS area will be lined with an impermeable membrane or similar impermeable barrier to prevent any pollution associated with fire water runoff from entering the ground. Further details regarding this is presented in Section 11.7 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) and within **ES Appendix 11-4 Outline Drainage Strategy** (Doc Ref. 6.3).<br><br>In terms of the fire risk concerns, measures are included within the **Outline Battery Safety Management Plan** (Doc Ref. 7.18) which aligns with the guidance from the National Fire Chief's Council. |

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| | • Any system for the storage of contaminated firewater should have sufficient capacity/headroom for the volumes expected in the event of a fire, even during periods of intense rainfall.<br>• The system for containing firefighting effluent should be automatic with a backup system in place in case of power failure.<br>The National Fire Chief's Council has published detailed guidance on recommended fire protection measures for BESS sites. We recommend the applicant refers to this when designing the scheme: Grid Scale Battery Energy Storage System planning – Guidance for FRS (nfcc.org.uk). The Applicant should note that this guidance is currently in the process of being updated and may not be applicable by the time the DCO application is submitted. | | |
| Environment Agency | **Document Reference : PEIR Vol.1 Ch.8**<br>**Issue**<br>The PEIR does not identify or evaluate the sustainability of sources of water supply for activities which include (but may not be limited to) dust suppression, concrete production; wheel washing; potable and domestic water supply and HDD which will impact on surface water sources via direct abstraction or as a result of increased mains water supply from the water company.<br>**Impact**<br>There may be practical constraints on mains connections in remote areas; limits on increased construction traffic for 58inkering water; and any water abstraction requirements from the surface water drains would also require an abstraction licence. There is high demand for water for summer irrigation in this area and it is likely that any prospective licence will include an upstream flow cessation and/or a level-based condition relating to the locality in the South Holland or the North level IDBs. This would restrict access to surface water to the winter season only which would require careful planning of construction activities not yet covered by the EIA<br>**Solution**<br>We recommend that a water supply strategy is undertaken to assess volumes of water required for consumptive uses and to options appraise the sources of supply that are available to meet demands during construction to include water company/mains supply, 58inkering; surface water or groundwater abstraction. | N | During construction, the provision for water supply will be from commercial sources (i.e. 58inkerin in). It is not proposed that water supply is drawn from mains water for the construction of the Scheme, unless otherwise agreed by Anglian Water (mains water supplier). This includes any maintenance activities during operation, including panel cleaning. However, connection to the mains supply for potable water for the permanent on-site offices remains an option to be considered in consultation with AWS during detailed design post DCO consent. Based on the small number of employees to be present at the operational Scheme (10 FTE), it is considered the Scheme would cause no significant impact to the area of Water Stress, even if mains supply is utilised. Therefore, it has been scoped out from further assessment.<br>Refer to 'Water Supply and Water Resources' in Section 11.4 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). |
| Environment Agency | **Public water supply informative:**<br>The location of this development is in an area of serious water stress (as identified in our report Water stressed areas – 2021 classification (https://www.gov.uk/government/publications/water-stressed-areas-2021-classification). Developments have the potential to increase demand for water and result in increased abstraction from groundwater sources. | N | During construction and operation, the provision for water supply will be from commercial sources which has been factored into the assessment presented in **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1). It is not proposed that water supply is drawn from mains water for the construction of the Scheme, unless otherwise agreed by Anglian Water (mains water supplier). This includes any maintenance activities during operation, including panel cleaning. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | Anglian Water Services Ltd (AWS) who supply the region of this development, is subject to licence reductions (caps) on its groundwater licences to manage the risk of deterioration of the associated water bodies, according to the principles set out in the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD Regulations). The company's 2024 water resources management plan (WRMP24) has set out that it will be reliant on seeking to defer some licence reductions until new strategic supplies can be developed (e.g. via strategic schemes). This means that until these new sustainable supplies are available, supplies to existing customers and those to supply growth will be as a result of deferring some licence changes under Regulation 19 of the Water Framework Regulations.<br><br>AWS's WRMP also sets out that the company may not be able to supply all new non-domestic demands until new supplies are developed. We are not aware of such restrictions applying to this supply zone however we advise that the availability of supply to any non-domestic purposes be explicitly checked with AWS.<br><br>Mains water supply may not be practical in more remote areas of the scheme location and 59inkering water supply may not cover quantities adequately and increases the numbers of HGVs to the local road network.<br><br>Most water related construction activities, including dust suppression, washing, use in drilling fluids for HDD are licensable activities if they abstract more than 20 m3 a day and as such, early consideration should be given regarding where the water can be sourced from, and the water company isn't the provider. New consumptive groundwater licences are not available, and surface water is restricted to high flows only. New dewatering will need to demonstrate that it is non-consumptive to the local environment to obtain an abstraction licence. | | However, connection to the mains supply for potable water for the permanent on-site offices remains an option to be considered in consultation with AWS during detailed design post DCO consent. Based on the small number of employees to be present at the operational Scheme (10 FTE), it is considered the Scheme would cause no significant impact to the area of Water Stress, even if mains supply is utilised. Therefore, it has been scoped out from further assessment. This is included under 'Water Supply and Water Resources' in Section 11.4 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). |
| Environment Agency | **Consents Strategy**<br><br>A number of permits and licenses may be required to facilitate this scheme. Should you wish to disapply any element of these proposals and bring within the scope of the Development Consent Order (DCO) details of this should be provided to the Environment Agency a minimum of 6 months prior to DCO submission.<br><br>We will require a consenting strategy document to be submitted in support of the proposals which outlines what consents are required and a programme of managing the various consents and permits, and confirmation of whether this will be subsumed within the DCO process or as standalone permits.<br><br>We recommend early engagement with our National Permitting Service (NPS) and full use of their enhanced pre-application advice service to ensure the permitting requirements and implications are fully understood and addressed in good time to inform the Planning Inspectorate (PINS) decision making process. Twin tracking is recommended for those applications considered fundamental to the DCO. | N | The Applicant confirms that a **Schedule of Other Consents and Licences** (Doc Ref. 3.3) has been submitted as part of the DCO Application. The Applicant welcomes ongoing engagement with the Environment Agency and has engaged with the enhanced pre-application advice service. |
| Environment Agency | **Flood Risk Activity Permit (FRAP)** | N | The Applicant is proposing to disapply the application of flood risk activity permits within **Article 7 of the draft DCO** (Doc Ref. 3.1), |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:<br>• on or within 8 metres of a main river (16 metres if tidal)<br>• on or within 8 metres of a flood defence structure or culverted main river (16<br>• metres if tidal)<br>• on or within 16 metres of a sea defence<br>• involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert<br>• on the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission | | with the controls they typically capture to instead be managed by the protective provisions to be agreed with the EA. Those protective provisions remain under negotiation between the Applicant and the EA. |
| Environment Agency | **Abstraction and Impoundment**<br>The proposals may require Water Resource Licences in respect of the construction activities required. Advice on regulated activities and licence requirements is given below.<br>Water Resource (Impoundment and Abstraction) Licences are issued by the Environment Agency under the terms of the Water Resources Act 1991 and the provisions of the Water Resources (Abstraction and Impounding) Regulations 2006. No other Environment Agency administered Regulatory Regime provides consent to create or modify an impoundment and / or abstracted water at volumes greater than 20m3/day. You should seek to fully understand the permissions required for your proposal and not assume consent for abstraction and impoundment activity is provided by other regulatory documents. | N | The Applicant recognises that Water Resource Licences for abstraction, transfer or impoundment may be required in connection with certain construction activities, in accordance with the Water Resources Act 1991 and associated regulations.<br>As set out in the **Schedule of Other Consents and Licences** (Doc Ref. 3.3), groundwater pumping or dewatering may be required during construction where intrusive techniques are used, and temporary impounding or diversion of watercourses may also be required. The need for, and scope of, any abstraction or impoundment licence will depend on the detailed construction methodology, volumes and duration of works.<br>No applications have been made at this stage. It is anticipated that the principal contractor will secure any required licence from the Environment Agency prior to construction. The Applicant will continue to engage with the Environment Agency to ensure that appropriate consents are obtained where required. |
| Environment Agency | **Dewatering, Abstraction and Discharges**<br>If dewatering is required, you may require an abstraction licence if it doesn't meet the exemption in The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works. Temporary dewatering from excavations to surface water: RPS 261 – GOV.UK (www.gov.uk)<br>If you do not meet the exemption and requires a full abstraction licence, they should be aware that some aquifer units may be closed for new consumptive abstractions in this area. More information can be found on our website: Abstraction licensing strategies (CAMS process) – GOV.UK (www.gov.uk) | N | The Applicant acknowledges that dewatering activities associated with construction may require abstraction and/or water discharge consents, unless exemptions or relevant Regulatory Position Statements (RPS's) apply.<br>As identified in the **Schedule of Other Consents and Licences** (Doc Ref. 3.3), dewatering requirements will depend on the detailed construction methodology and site-specific conditions. In some cases, small-scale or temporary dewatering activities may be |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | Please note that the typical timescale to process a licence application is 9-12 months. You may wish to consider whether a scheme-wide dewatering application rather than individual applications would be beneficial. We suggest talking to our National Permitting Service early in the project planning.<br><br>Temporary dewatering of wholly or mainly rainwater that has accumulated in an excavation may be exempt from an Environmental Permit for a Water Discharge Activity. More information can be found on our website: https://www.gov.uk/government/publications/temporary-dewatering-from-excavations-to-surface-water. Note that this does not permit discharge of groundwater from a passive or active dewatering activity or permit the abstraction of groundwater.<br><br>You may also need to consider discharge of groundwater, especially if it is contaminated. More information can be found on our website: https://www.gov.uk/guidance/discharges-to-surface-water-and-groundwater-environmental-permits<br><br>The use of drilling muds for any necessary directional drilling may require a groundwater activity permit unless the 'de minimis' exemption applies. Early discussion about this is also recommended.<br><br>It is worth considering the likely infrastructure required to meet any potential discharge permit requirements to ensure that there is sufficient space within the Order Limits. For example, infrastructure required to treat any contaminated groundwater which may need to be discharged to surface waters. Insufficient space is a common constraint which can result in permit non-compliance, non-permitted discharges or expensive/complex treatment methods. | | exempt or covered by RPS's, subject to compliance with their conditions.<br><br>Where exemptions or RPS do not apply, any necessary abstraction licences or water discharge permits will be secured by the contractor prior to construction. The Applicant will continue to engage with the Environment Agency, including the National Permitting Service where appropriate, to confirm the applicable permitting route and ensure compliance with relevant requirements. |
| Environment Agency | **Impounding Licence Requirement**<br><br>If you intend to impound a watercourse then you are likely to need an impounding licence from the Environment Agency. An impoundment is any dam, weir or other structure that can raise the water level of a water body above its natural level. 'On-line' impoundments hold back water in rivers, stream, wetlands and estuaries, and consequently affect downstream flows, sediment transport and migration of fish. Impoundments could be created through works to modify or change existing watercourses. An Impoundment Licence could also be required if you amend, modify or remove existing in channel structures. More information is available on gov.uk: https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence | N | The Applicant acknowledges that any works that constitute the impoundment of a watercourse, including the temporary or permanent modification of in-channel structures, may require an impoundment licence from the Environment Agency.<br><br>As set out in the **Schedule of Other Consents and Licences** (Doc Ref. 3.3), the need for an impoundment licence will depend on the detailed design and construction methodology, including whether temporary diversions or impounding structures are required.<br><br>No application has been made at this stage. Where an impoundment licence is required, it is anticipated that this will be secured by the contractor prior to construction, following engagement with the Environment Agency. |
| Environment Agency | **Discharge of Trade Effluent**<br><br>Effluent discharged from any premises carrying on a trade or industry and effluent generated by a commercial enterprise where the effluent is different to that which would arise from domestic activities in a normal home is described as trade effluent. If you are not able to discharge effluent, it will be classed as waste, and you must then comply with your duty of care responsibilities. | N | The Applicant acknowledges the Environment Agency's advice in relation to the regulation of trade effluent discharges under the Water Industry Act 1991 and the Environmental Permitting (England and Wales) Regulations 2016.<br><br>The Applicant is proposing to disapply the requirement for consent under section 118 of the Water Industry Act 1991 (consent for discharge of trade effluent into a public sewer) |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | If you wish to discharge effluent, after appropriately treating it, to groundwater or surface water a permit under the Environmental Permit Regulations will be required. Full characterisation of the effluent will be required, and modelling may be required at the planning stage to determine the impact of the effluent on the receiving watercourse.<br><br>A trade effluent consent or a trade effluent agreement with your water and sewerage company must be obtained before you discharge trade effluent to a public foul sewer or a private sewer that connects to a public foul sewer. Further guidance is available at: https://www.gov.uk/guidance/pollution-prevention-for-businesses | | through Article 7 of the **Draft DCO** (Doc Ref. 3.1). The controls that would otherwise be secured through that regime will instead be managed through protective provisions to be agreed with the relevant statutory bodies, including the Environment Agency (and the relevant sewerage undertaker where applicable).<br><br>Those protective provisions remain under negotiation. Any discharge of effluent would be subject to appropriate controls, treatment and approval mechanisms secured through the DCO, and no discharge would take place unless authorised in accordance with those provisions. |
| Environment Agency | **Water Quality Permit requirements**<br><br>You do not require a permit if you are only discharging uncontaminated surface runoff. If you intend to discharge to surface water for dewatering purposes, this may be covered by a Regulatory Position Statement (RPS) for water discharge activities. If you can comply with all the conditions within the RPS, then a permit is not required for this activity. Please find the RPS conditions here: https://www.gov.uk/government/publications/temporary-dewatering-from-excavations-to-surface-water<br><br>If any discharges do not fully comply with the RPS, then a bespoke discharge permit will be required. Please find guidance on applying for a bespoke water discharge permit here: https://www.gov.uk/guidance/discharges-to-surface-water-and-groundwater-environmental-permits | N | The Applicant acknowledges that water discharge permit requirements will depend on the nature and quality of any discharges. As noted by the Environment Agency, uncontaminated surface water runoff may not require a permit, and certain temporary dewatering discharges may be covered by Regulatory Position Statements, subject to compliance with their conditions.<br><br>As set out in the **Schedule of Other Consents and Licences** (Doc Ref. 3.3), where water discharge activities to controlled waters are required and are not exempt or covered by an RPS, an application for a bespoke water discharge permit will be made by the contractor prior to discharge.<br><br>The Applicant will continue to engage with the Environment Agency to confirm the appropriate permitting route and ensure that sufficient space and infrastructure are available within the Order Limits to support any necessary treatment or discharge arrangements. |
| Environment Agency | **Waste On-Site**<br><br>Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.<br><br>Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.<br><br>The Environment Agency recommends that developers should refer to our: | N | The **Outline Site Waste Management Plan (OSWMP)** (Doc Ref. 7.19) states that excavated material reuse would be determined via a Materials Management Plan (MMP) in accordance with the CL:AIRE Definition of Waste: Code of Practice (DoW CoP), exemption or environmental permission. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | • Position statement on the Definition of Waste: Development Industry Code of Practice and;<br>• website at https://www.gov.uk/government/organisations/environment-agency for further guidance | | |
| Environment Agency | **Waste to be taken off-site**<br>Contaminated soil that is, or must be disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:<br>• Duty of Care Regulations 1991<br>• Hazardous Waste (England and Wales) Regulations 2005<br>• Environmental Permitting (England and Wales) Regulations 2010<br>• The Waste (England and Wales) Regulations 2011<br>Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste – Sampling of Waste Materials – Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to our website at www.gov.uk/government/organisations/environment-agency for more information. | N | The **Outline Site Waste Management Plan (OSWMP)** (Doc Ref. 7.19) sets out the principles for the management of construction waste. |
| Environment Agency | **Movement of waste off-site**<br>The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes.<br>The code of practice applies to you if you produce, carry, keep, dispose of, treat, import or have control of waste in England or Wales.<br>The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly and only given to businesses authorised to take it. The code of practice can be found here: https://www.gov.uk//uploads/system/uploads/attachment_data///waste-duty-care-code-practice-2016.pdf<br>If you need to register as a carrier of waste, please follow the instructions here: https://www.gov.uk/register-as-a-waste-carrier-broker-or-dealer-wales | N | The **Outline Site Waste Management Plan (OSWMP)** (Doc Ref. 7.19) sets out the principles for the management of construction waste. |
| Environment Agency | **Characterisation and classification of waste**<br>In order to meet your objectives for the waste hierarchy and obligations under the duty of care, it is important that waste is properly classified. Some waste (e.g. wood and wood based products) may be | N | The **Outline Site Waste Management Plan (OSWMP)** (Doc Ref. 7.19) sets out the principles for the management of construction waste. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | either a hazardous or non-hazardous waste dependent upon whether or not they have had preservative treatments.<br><br>Proper classification of the waste both ensures compliance and enables the correct onward handling and treatment to be applied. In the case of treated wood, it may require high temperature incineration in a directive compliant facility. More information on this can be found here: https://www.gov.uk/how-to-classify-different-types-of-waste | | |
| Environment Agency | **Use of waste on-site**<br><br>If materials that are potentially waste are to be used on-site, you will need to ensure you can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) l) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc…' in order for the material not to be considered as waste. Meeting these criteria will mean waste permitting requirements do not apply.<br><br>Where you cannot meet the criteria, you will be required to obtain the appropriate waste permit or exemption from us.<br><br>A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as:<br><br>• any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.<br><br>• We have produced guidance on the recovery test which can be viewed at https://www.gov.uk/guidance/waste-recovery-plans-and-permits#waste-recovery-activities.<br><br>If you require any local advice or guidance, please contact the National Enquiries Unit on: 03708 506 506 | N | The **Outline Site Waste Management Plan (OSWMP)** (Doc Ref. 7.19) sets out the principles for the management of construction waste. |
| Environment Agency | **The Waste Hierarchy and Resource Management in relation to Construction Wastes**<br><br>The developer must apply the waste hierarchy as a priority order of prevention, re-use, recycling before considering other recovery or disposal options. Government guidance on the waste hierarchy in England can be found here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69403/pb13530-waste-hierarchy-guidance.pdf<br><br>Site Waste Management Plans (SWMP) are no longer a legal requirement, however, in terms of meeting the objectives of the waste hierarchy and your duty of care, they are a useful tool and considered to be best practice. | N | The **Outline Site Waste Management Plan (OSWMP)** (Doc Ref. 7.19) sets out the principles for the management of construction waste. |
| Environment Agency | **Management and reporting systems**<br><br>Where a development involves any significant construction or related activities, we would recommend using a management and reporting system to minimise and track the fate of construction wastes, such | N | The **Outline Site Waste Management Plan (OSWMP)** (Doc Ref. 7.19) sets out the principles for the management of construction waste. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | as that set out in PAS402: 2013, or an appropriate equivalent assurance methodology. This should ensure that any waste contractors employed are suitably responsible in ensuring waste only goes to legitimate destinations.<br><br>You can find more information on the Waste Framework Directive here: https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-framework-directive<br><br>More information on the definition of waste can be found here: https://www.gov.uk/government/publications/legal-definition-of-waste-guidance<br><br>More information on the use of waste in exempt activities can be found here: https://www.gov.uk/government/collections/waste-exemptions-using-waste<br><br>Non-waste activities are not regulated by us (i.e. activities carried out under the CL:ARE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the WFD). The 'Is it waste' tool, allows you to make an assessment and can be found here: https://www.gov.uk/government/publications/isitwaste-tool-for-advice-on-the-by-products-and-end-of-waste-tests | | |

## 2.8. Fenland District Council

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Fenland District Council | The Council supports, in principle, the development of renewable energy infrastructure and acknowledges its important contribution to achieving the UK's net zero targets. However, we wish to raise several matters that we believe require further consideration as the proposal is refined ahead of submission, and to highlight the importance of continued, structured engagement. | N | The Applicant notes this comment. |
| Fenland District Council | **Use of Productive Agricultural Land**<br>The Council notes with concern the growing trend of large-scale solar developments being located on productive agricultural land, particularly in areas such as Fenland, which make a significant contribution to national food production.<br>It appears that the proposed site includes land classified as best and most versatile(BMV). Such land is a valuable national resource for food production, and its loss – especially cumulatively across multiple projects – may have long-term implications for food security, the local economy, and the rural landscape. We therefore encourage the applicant to clearly set out the site's agricultural land classification and to consider how impacts on high-quality farmland can be minimised or mitigated. | N | The cumulative assessment presented in **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) concludes that while there is an additive effect of multiple solar schemes, the proportion of agricultural and BMV land affected at a county scale is small and largely temporary, with permanent loss of BMV land minimal. On this basis, cumulative effects on agricultural land, food production and food security are assessed as not significant.<br>The **OSMP** (Doc Ref. 7.14) commits to the careful stripping, storage and reinstatement of soils, and to decommissioning the Scheme in a manner that seeks to restore all agricultural land to its pre-development condition without degradation of the current ALC grade. Any minor post-restoration variability would be monitored and addressed as necessary. |
| Fenland District Council | **Potential Impacts on Peatlands**<br>The Preliminary Environmental Information Report (PEIR) for the Meridian Solar Farm, specifically Chapter 9: Agriculture and Soils, provides an assessment of the potential impacts on agricultural land and soils within the proposed development area. However, this chapter does not explicitly mention the presence or absence of peat soils within the site. Given that the proposed site is located within the Lincolnshire Fens—a region known for its peat-rich soils—it is plausible that peat soils may be present in certain areas of the development site. The PEIR references Agricultural Land Classification (ALC) surveys and includes figures and appendices detailing soil types and classifications, but without specific mention of peat soils, it is unclear whether these surveys identified peat or assessed its depth and condition. | N | The ALC surveys presented within **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3) did not identify any peat soil within the Scheme boundary. Soil types identified are presented in Section 5.6 of **ES Chapter 5 Agriculture and Soils** (Doc Ref 6.1). |
| Fenland District Council | Peatlands are significant carbon sinks, and their disturbance can lead to the release of stored carbon dioxide, contributing to greenhouse gas emissions. Therefore, understanding the presence and extent of peat soils is crucial for assessing the environmental impact of the proposed solar farm. The installation and operation of solar farms can potentially disturb peatland habitats, primarily through:<br>• Reduction in sunlight and rainfall beneath solar panels, affecting vegetation composition and potentially altering the hydrological function of the peatland. | N | The ALC surveys presented within **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3) did not identify any peat soil within the Scheme boundary. Soil types identified are presented in Section 5.6 of **ES Chapter 5 Agriculture and Soils** (Doc Ref 6.1). |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | • Physical disturbance from construction activities, including the installation of access tracks and ancillary structures.<br><br>Where possible, proposals should avoid peatlands and minimise peatland loss and disturbance. | | |
| Fenland District Council | **Construction Traffic and Cumulative Infrastructure Impact**<br><br>The proposal is being developed in a wider regional context where a number of nationally significant and major infrastructure projects are already progressing or proposed, including:<br><br>• The Fens Reservoir (Anglian Water and Cambridge Water)<br>• National Grid's Eastern GREEN links and Grimsby to Walpole projects<br>• Other solar and renewable energy schemes and associated grid infrastructure<br><br>The cumulative construction impacts of these developments are likely to place increasing pressure on rural roads and local communities. Fenland's highway network is particularly sensitive to increased heavy vehicle movements. We therefore encourage the applicant to work collaboratively with relevant authorities and infrastructure promoters to develop a coordinated traffic management approach, including mitigation of overlapping construction periods, defined routing strategies, and effective communication with residents and businesses. | N | Details of the approach and assessment of the cumulative effects are included in **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) Section 15.11.<br><br>The ES includes a cumulative assessment of other proposed developments in the study area. The list of cumulative proposed developments for review has been agreed with the LHAs and includes the proposed developments listed. |
| Fenland District Council | **Community Benefits and Environmental Education**<br>The scale and national importance of this proposal present an opportunity to deliver meaningful benefits to the local communities affected by its delivery and operation.<br><br>We encourage the applicant to explore potential for community benefit initiatives within Fenland, including:<br><br>• Environmental education programmes for schools and local groups<br>• Biodiversity and sustainability initiatives aligned with the Environment Act 2021<br>• Projects that promote understanding of renewable energy and climate change at the community level<br><br>Such initiatives would support local resilience, improve community awareness and engagement, and help build positive relationships between infrastructure providers and communities. | N | Details of the Applicant's approach to community benefits, education initiatives and wider socio-economic opportunities are provided in the **Planning Statement** (Doc Ref 7.1) and the **Outline Skills, Supply Chain and Employment Plan** (Doc Ref. 7.17). |
| Fenland District Council | **Planning Performance Agreement and Ongoing Engagement**<br>To ensure appropriate and ongoing engagement as the scheme progresses towards submission, the Council invites the applicant to enter into a Planning Performance Agreement (PPA). A PPA would provide a framework for effective dialogue, early resolution of issues, and timely input from local stakeholders.<br><br>Fenland District Council remains committed to constructive engagement and would welcome further discussions with the applicant to ensure that the emerging proposal is refined in a way that addresses both national policy objectives and local priorities. | N | The Applicant welcomes ongoing engagement with Fenland District Council. A Community Liaison Group will be established post-consent to facilitate liaison between representatives of people living in the vicinity of the Scheme and other relevant organisations during construction as per Requirement 4 of the **Draft DCO** (Doc Ref. 3.1). |

## 2.9. Forestry Commission

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Forestry Commission | We note from the documents that the small, fragmented woodlands within the site area would be retained and enhanced, with plans to create scattered isolated woodlands, also with planting of riparian areas and planting of individual trees.<br><br>Fragmentation is one of the greatest threats to mixed deciduous woodland. Habitat connectivity should be considered with both existing woodlands and new planting schemes. | N | The concern regarding woodland fragmentation is acknowledged. Habitat connectivity has been considered through the Scheme design and planting proposals, with the inclusion of scattered shrub and tree planting which is set out in the **OLEMP** (Doc Ref. 7.16) as well as **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) and **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |
| Forestry Commission | While we note from the Landscape Mitigation Plan there appears to be a welcome significant increase in canopy cover planned across the site, connectivity could be improved and enhanced further. Particularly along the northern boundary with the existing tree line where infilling is proposed. Connectivity would be further improved with the inclusion of a linear woodland or thick hedgerow with scattered mature trees. | N | Opportunities for enhanced connectivity (including along the northern boundary) have been considered with the inclusion of proposed scattered shrubs and trees as included within **OLEMP** (Doc Ref. 7.16), as well as **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) and **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |
| Forestry Commission | With the proposed scheme already bringing changes to the landscape, the inclusion of some connected tree belts could help to provide further screening for the project and lower flood risk. Isolated trees are also more likely to suffer from windthrow than when planted in groups and woodlands. | N | Opportunities for connected tree belts to provide screening, lower flood risk and avoid windthrow have been considered as shown within the Outline Landscape Masterplan included within the **OLEMP** (Doc Ref. 7.16) with the inclusion of scattered shrub and tree planting along field boundaries. The planting strategy has been designed to provide screening whilst ensuring that the planting proposals are in keeping with the surrounding landscape character. |
| Forestry Commission | We note that details of protection measures will be provided in the forthcoming CEMP and that existing woodlands will benefit from a 15m buffer. We look forward to seeing further documentation in later consultations, including the detailed planting plans within the LEMP. | N | The **OCEMP** (Doc Ref. 7.10) has been prepared to support the DCO Application. Table 3-5 confirms that at least a 15 m buffer will be applied around all existing woodlands.<br><br>An **OLEMP** (Doc Ref. 7.16) has also been prepared with the DCO Application and provides details of planting and vegetation management across the Scheme. |

## 2.10. GTC Utility Construction Limited

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| GTC Utility Construction Limited | I've just checked and your works boundaries do not intersect with any GTC Assets. | N | The Applicant notes this comment. |

## 2.11. Historic England

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
|---|---|---|---|
| Historic England | The PIER reflects the good communication and context specific approach demonstrated by the project, which is to be commended. The extent of constructive engagement with consultees and the timely deployment of well targeted expertise and resources is proportionate to the complexity of the archaeological and historic landscape context at Crowland. This landscape has undergone dramatic and repeated changes over the last 4000 years creating a rich resource and a special sense of place. This project will necessarily involve further change. It can be successful in delivering its public benefits by the integration of its analysis of the archaeological landscape with a scheme design which evolves pre and post consent. | N | The Applicant notes this comment. |
| Historic England | **Impacts**<br>The assessment of impacts upon buried and above ground remains is as discussed below a work in progress, current methodological approaches to assessment as set out in the PIER appear appropriate and fit for purpose, with the benefits of such refinements during the production of the Environmental Statement as may be prompted by the data and the use of professional judgement and expertise. | N | The assessment of likely significant effects has been informed by the evaluation works being undertaken across the Scheme. See **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) for further details. |
| Historic England | **Fieldwork Written scheme of investigation**<br>We have provided detailed comments on aspects of the fieldwork methodology and in respect of the assessment of visual impacts including the kinetic experience of the landscape. We note that fieldwork is already underway under a Written Scheme of Investigation, building on desk-based assessment, geophysical survey and ongoing deposit modelling work. This is a complex landscape of former wet and dry lands including high potential for waterlogged and salt industry remains.<br>We particularly welcome the use of intrusive fieldwork techniques targeted on those aspects of the site which present the greatest challenges in characterisation and risk management. This focus and adaptive methodological approach (informed by the non-intrusive phase) will ensure you are well placed to address significance and sensitivity through appropriate design as necessary. The use of specialist expertise in the areas of deposit modelling and ancient salt production (both highly relevant to this landscape) is to be applauded and will deliver a better process and more efficiently detailed scheme. | N | Evaluation works have been undertaken to support the assessment stage, understand the cultural significance of the cultural heritage and development of the mitigation and management strategy. While the full trial trenching report is still pending, it will be provided during examination. Consultation has been ongoing and will continue through the development of the archaeological mitigation and management strategy as secured by Requirement 11 of the **Draft DCO** (Doc Ref. 3.1) to ensure significance and sensitivity are appropriately addressed. The impact of the Scheme has been assessed in the meantime on a precautionary basis to provide a reasonable worst-case assessment for the purposes of the DCO Application, see **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) for further details. |
| Historic England | **Roman and Later Prehistoric Scheduled Monuments**<br>The site contains two scheduled monuments identified through aerial photographic work, these sites are visible in the current survey work and can now, with the benefit of integrated aerial photography, geophysical survey and lidar, begin to be understood in their ancient landscape context. We welcome the approach taken to the scheduled sites in the emerging design. Further similar sites identified in scheme may we be best addressed with appropriate design and an understanding of significance and sensitivity (rather than via a reassessment of designation). | N | The Applicant notes this comment. Where archaeological deposits of equivalent significance have been identified this has been addressed with design consideration considered as part of the assessment of potential significant effects. See section 8-5 and 8-9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) for further details. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Historic England | **Setting**<br>We look forwards to exploring setting issues further, in detail, as your assessment work comes through, particularly the work (in relation to Crowland Abbey grade I and scheduled monument and associated boundary markers earthwork features etc), this with a view to the methods in our GPA3 Setting of Heritage Assets. This work will assist in respect of the arrays, the associated infrastructure and the electrical connection. | N | Further engagement with HE in relation to the setting of heritage assets has been undertaken. Assessment of the potential effects on setting has been undertaken. This includes use of the ZTVs and visualisations produced by the Landscape team, further research and a site assessment. See sections 8-6, 8-7 and 8-9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) for further details. |
| Historic England | **Secondary Physical Impacts**<br>Secondary impacts from cable trenches etc where they cross wet deposits should be considered as they can potentially set of decay process which continue past the construction phase, where cable trench's act ad drains for instance. | N | Information compiled in consultation with the drainage and hydrology specialists has been included in Section 8-6 and 8-9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). Consideration of secondary impacts due to changes in ground conditions has been undertaken. |

## 2.12. Health and Safety Executive

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Health and Safety Executive | Will the proposed development fall within any of HSE's consultation distances?<br>According to HSE's records, the proposed DCO application boundary for this Nationally Significant Infrastructure Project is within the consultation zones of **no** major accident hazard site ['MAHS'] and **one** major accident hazard pipeline ['MAHP']. This is based on the boundary lines shown in Figure 1-2 Version 1.0 10/04/2025 of the Preliminary Environmental Information Report April 2025 (hereafter referred to as 'PEIR') [downloaded from: https://meridiansolarfarm.co.uk/wp-content/uploads/2025/stage-twoconsultation/peir-volume-ii/0102%20-%20PEIR%20Volume%20II%20Figure%201-2%20The%20Site.pdf] and the GIS files provided GIS files of the Draft Order Limits provided on 09/05/2025 via WeTransfer. | N | The InterGen major accident hazard pipeline has been included in the baseline and has been subject to an assessment within **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1).<br>The pipeline crosses the Order Limits at the northern end of the Grid Connection Route, where the indicative location of the proposed Weston Marsh Substation and an area of flexibility within the Scheme design have been identified. Subject to the final Scheme design and the precise location of infrastructure, the Applicant is engaging with Intergen, via its subsidiaries Spalding Energy Company Limited and Spalding Energy Expansion Limited, to agree appropriate protection measures and working arrangements in relation to the pipeline.<br>Further information can be found in Section 16.5: Major Accidents and Disasters of **ES Chapter 16 Other Environmental Topics** (Doc Ref 6.1) and **ES Appendix 16-4: Long list of Major Accidents and Disasters** (Doc Ref 6.3). |
| Health and Safety Executive | HSE's records indicate that the major accident hazard pipeline operated by InterGen (UK) Limited, is:<br>• NTS to Spalding Energy PS Pipeline; HSE ref. number 11622.<br>As described within the PEIR Table 14-6-2, the Applicant should contact the above operator to verify the above and to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident. There are three particular reasons for this:<br>i. The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.<br>ii. The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.<br>iii. To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards. | N | The InterGen major accident hazard pipeline has been included in the baseline and has been subject to an assessment within **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1).<br>The pipeline crosses the Order Limits at the northern end of the Grid Connection Route, where the indicative location of Weston Marsh Substation and an area of flexibility within the Scheme design have been identified. The Applicant acknowledges the Health and Safety Executive's advice regarding the potential legal interests of the pipeline operator, operational constraints (including restrictions on traffic routes), and the potential need for alteration or upgrading of the pipeline or its operation.<br>The Applicant is seeking to agree bespoke protective provisions with Spalding Energy Company Limited and Spalding Energy Expansion Limited (subsidiaries of InterGen) to secure appropriate protection of the pipeline and to regulate the exercise of DCO powers in the vicinity of the pipeline. These provisions will ensure that the pipeline operator's interests are |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | | | safeguarded and that construction and operation of the Scheme do not compromise pipeline integrity or safety.<br><br>Further information can be found in Section 16.5: Major Accidents and Disasters of **ES Chapter 16 Other Environmental Topics** (Doc Ref 6.1) and **ES Appendix 16-4: Long list of Major Accidents and Disasters** (Doc Ref 6.3). |
| Health and Safety Executive | HSE's Land Use Planning advice is dependent on the location of areas where people may be present [HSE: Land use planning - HSE's land use planning methodology]. Based on the information in the PEIR it is unlikely that HSE would advise against the development. Please note that the advice is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted. | N | The Applicant notes this comment. |
| Health and Safety Executive | <u>Would Hazardous Substance Consent be needed?</u><br>Hazard classification is relevant to the potential for accidents. Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an "addition rule" in Part 4 of Schedule 1 for below-threshold substances.<br><br>Based on the PEIR it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. This may be because there are no in-scope hazardous substances. If hazardous substances planning consent is required, please consult the relevant Hazardous Substance Authority (usually the Local Planning Authority) on the application. | N | The Scheme does not require the use and storage of chemical or hazardous substances therefore a Hazardous Substances Consent would not be required. |
| Health and Safety Executive | <u>Consideration of Risk Assessments</u><br>Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11 "working with public bodies in the infrastructure planning process" Annex G on the Planning Inspectorate's website: Nationally Significant Infrastructure Projects - Advice on working with public bodies in the infrastructure planning process, Annex G: The Health and Safety Executive - GOV.UK. This document includes the applicant's consideration of risk assessments under the heading "Risk assessments".<br><br>The PEIR Volume 1 Chapter 14 [https://meridiansolarfarm.co.uk/documents/] contains Section 14.6 which is titled 'Major Accidents and Disasters' and is supported by PEIR Volume III Appendix 14-3 titled 'Long list of Major Accidents'. Table 14-6-5 is titled a 'preliminary assessment of major accidents and disasters' and appears to contain a qualitative assessment of the major accident or disaster. | N | The design, construction, operation and decommissioning of the Scheme will be undertaken in accordance with the relevant health and safety legislation and guidance.<br><br>The risk of Major Accidents and Disasters has been assessed in **ES Chapter 16: Other Environmental Topics** of the ES (Doc Ref. 6.1).<br><br>Measures taken to avoid the risk of major accidents during construction, operation, and decommissioning are secured through appropriate risk assessments and management measures, as set out in the **Outline CEMP** (Doc Ref 7.10), **Outline OEMP** (Doc Ref. 7.11) and **Outline DEMP** (Doc Ref. 7.12). |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | There are no requirements for any risk assessments submitted to and approved by the relevant planning authority to also be considered by HSE. We would advise Risk Assessments are considered further in line with Advice Note 11 Annex G taking account of the following: *"it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses."*. | | |
| Health and Safety Executive | Explosives sites<br>HSE has no comment to make as there are no licensed explosives sites in the vicinity | N | The Applicant notes this comment. |
| Health and Safety Executive | Electrical Safety<br>No comment from a planning perspective. | N | The Applicant notes this comment. |

## 2.13. Lincolnshire County Council

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Lincolnshire County Council | Thank you for your email dated 24 April 2025 inviting Lincolnshire County Council's (the Council) comments in respect of the above proposal.<br><br>The Council as host authority has reviewed the information provided and set out the comments below in response to the statutory consultation for the above project held between 24 April and 8 June 2025 pursuant to Section 42 (1) (b) of the 2008 Planning Act.<br><br>This representation sets out the detailed technical comments and advice from the Council's in-house officers and consultants employed by the Council to provide Landscape and Visual Impact advice and Agricultural Land Classification assessment advice based on the information provided at this stage in the Preliminary Environmental Information Report (PEIR). It is noted that further assessment work and information about the development has yet to be presented and this will need to be completed and form part of the final Environmental Statement (ES).<br><br>The Council does not have in-house specialists or advisors for all topic areas covered by the PEIR and general comments are therefore also provided on the other topic areas where it is considered necessary, however, the Council supports comments made by South Holland District Council (SHDC) on topics/areas that fall outside of the Council's statutory remit or expertise at this stage. Further comments will however continue to be provided as the project evolves and as the ES is completed.<br><br>Given the extent and nature of the matters that are being raised by the Council in this response it was not practical for these to be expressed using the format of the Meridian Solar Farm consultation questionnaire.<br><br>The Council has the following comments on the topic chapters as presented in the PEIR. | N | The Applicant notes this comment. |
| Lincolnshire County Council | **Chapter 1: Introduction**<br><br>Since the drafting and publication of the PEIR document the developer's attention is drawn to the reference to the Lincolnshire County Council local planning documents at paragraph 1.4.14 is noted. The Lincolnshire Minerals and Waste Local Plan (2016) (LMWLP), is currently under review and details on its progress can be found on the Council's website here: https://www.lincolnshire.gov.uk/planning/minerals-waste/2<br><br>Attention is also drawn to the Council's Energy Infrastructure Position Statement adopted 5 December 2023. The Council will seek to protect high quality agricultural land in Lincolnshire (Grades 1, 2 and 3a) from development in accordance with its Position Statement. Further comments on agricultural land are made under the section on Chapter 10 below. https://lincolnshire.moderngov.co.uk/documents/s60096/Energy%20Infrastructure%20Position.pdf | N | The Applicant notes the update regarding the review of the Lincolnshire Minerals and Waste Local Plan and the adoption of the Council's Energy Infrastructure Position Statement. These documents have been taken into account, as set out within **ES Chapter 1 Introduction** (Doc Ref 6.1) and the Planning Statement (Doc Ref. 7.1). |
| Lincolnshire County Council | **Chapter 2: The Scheme**<br><br>**Grid Connection** | N | **ES Chapter 2 The Scheme** (Doc Ref 6.1) outlines the updated programme information, including the grid connection route |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | It is noted that the developer has secured grid connection to a proposed new substation at Weston March which will be delivered by the Grimsby to Walpole high-voltage electricity transmission line. The proposed location of the Weston Marsh substation however is yet to be confirmed.<br><br>It is noted from paragraph 2.12.1 that the Meridian construction phase is anticipated to take 24-36 months with the earliest it could commence is 2027 with earliest the construction phase could end, and the operational phase begin, being 2029. It is noted from the National Grid website that it is proposed that construction would start on the Grimsby to Walpole high-voltage electricity transmission line and associated infrastructure in 2029 with the facility being fully operational from 2033. Paragraph 2.12.2 states that details on the construction programme are to be further refined as part of the design process and further details will be outlined within the ES. It is suggested that the construction and operational timelines for the Grimsby to Walpole scheme is referenced within the ES.<br><br>The anticipated operational date should be clarified and further information provided on how this would align with the anticipated date for the Weston Marsh substation coming online. It is assumed that the development could not become operational until such time as the Weston Marsh substation is built and operational, or another alternative connection is found. However, should 2029 be the correct operational date for Meridian, how would this work operationally, what would the alternatives be and what contingencies would be in place should the substation be delayed or in the event it does not go ahead? | | construction and the anticipated earliest operational year of 2033, in line with when the National Grid Weston Marsh B Substation is due to become operational. The Scheme would only become operational once a suitable grid connection becomes available. Further information is contained within the **Grid Connection Statement** (Doc Ref. 7.5). It is considered unlikely that new or materially different effects would arise if operation started later than this date. **ES Chapter 4: Overview of the EIA Process** (Doc Ref. 6.1) provides further information on the consideration of the implications of assessment years changing. |
| Lincolnshire County Council | **Chapter 3: Alternatives and Design Evolution**<br><br>Paragraphs 3.2.7 and 3.2.8 describe the network connection offer which was a factor in the proposed siting of the Meridian Solar Farm. Engagement with National Grid Energy Transmission (NGET) identified a proposed new large scale NGET substation (subsequently called the Weston Marsh Substation). A connection application was submitted and an offer made. The potential location of the proposed Weston Marsh Substation however has not yet been identified, and as such the grid connection corridor provides the extremities of the 3 potential overhead transmission line route to connect the solar array to the proposed substation.<br><br>The statement in NPS EN-5 as referenced in paragraph 3.5.2 of the PEIR is acknowledged, however this is the 'starting' presumption. The introduction of further overhead lines into a flat landscape where additional NGET overhead transmission lines from the Grimsby to Walpole project and the proposed Weston Marsh to East Leicestershire project will also cross the same landscape is of concern to the Council alongside the potential proximity to residential areas. | N | The Applicant notes this comment. In accordance with NPS EN-5, the need for an overhead grid connection has been treated as the starting presumption; however, landscape effects, cumulative impacts and proximity to residential receptors have also informed the assessment and design evolution. Following the receipt of feedback in the EIA Scoping Opinion and non-statutory engagement, a preferred Grid Connection Corridor was selected from the options consulted on. The consideration of alternatives, cumulative context and the evolution of design are set out Section 3.5 of **ES Chapter 3 Alternatives and Design Evolution** (Doc Ref 6.1), with associated landscape effects assessed within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |
| Lincolnshire County Council | **Chapter 6: Cultural Heritage**<br><br>**Built Heritage – Study Area/ Assessment Scope**<br><br>The Council remain concerned by the PEIR's narrow application of study areas for assessing setting impacts, particularly in relation to above-ground infrastructure such as overhead lines, BESS, and substations. While a 5km radius is mentioned for designated heritage assets, the majority of the setting assessment appears to adopt a default 1km study area, with selective appraisal of higher-graded assets | N | Following discussion with LCC's Historic Landscape Officer, the study area for the Grid Connection Route has been expanded to 2km to better reflect potential setting effects. In addition, assets of high importance within a 5km radius have been considered in the assessment. The approach seeks to balance proportionality with the extent and nature of the proposed infrastructure. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | beyond this range. In its current format, this approach is not considered adequate given the extent and nature of the proposed infrastructure.<br><br>The Grid Connection Corridor alone would comprise 12–13km of 400kV overhead lines on towers approximately 50m in height, set at spans of c.350m. Infrastructure of this scale will inevitably result in long-range visual impacts across the flat, open fenland landscape and is likely to affect the setting of both designated and non-designated heritage assets well beyond 1km. It is noted, in particular, the proximity of Moulton, Crowland and Spalding Conservation Areas, as well as numerous Grade I and II* listed buildings. The applicant should give careful consideration to how change in setting and intervisibility between assets is assessed.<br><br>The Council would welcome further dialogue on how key receptors will be selected for detailed assessment in the ES and recommend that a consistent study area of at least 2km be applied to all non-designated above-ground heritage assets and 5km for designated assets. Justification should be provided for any deviation from this approach. | | Consideration of heritage assets of high importance have been considered as part of the impact assessment, including those outside of the 1km and 2km study areas.<br><br>See Section 8-4 and 8-9 of **ES Chapter 8: Cultural Heritage** (Doc Ref 6.1) **and ES Appendix 8-4: Summary of Heritage Setting Assessment** (Doc Ref. 6.3) further details. |
| Lincolnshire County Council | **Inter-Array and Grid Connection Corridors – Tall Infrastructure**<br>The PEIR identifies the potential for additional overhead lines along the Inter-Array routes between land parcels with single-circuit 'trident' poles of up to 15m in height, spaced every 120m. These would impact a number of features within the historic environment. Any potential harm along the proposed route where it meets sensitive receptors should form part of the ES.<br><br>The BESS and on-site substation compounds are anticipated to be 60m x 30m in footprint and up to 15–17.5m high above ground level (accounting for flood mitigation). These elements, particularly where located within otherwise flat open landscapes, may result in substantial change to views and settings of nearby heritage assets and should be properly accounted for within the assessment criteria of the ES. | N | A full assessment of the potential effects on sensitive receptors within the Inter-Array Routes is included within Sections 8-4. 8-9 of **ES Chapter 8: Cultural Heritage** (Doc Ref 6.1) and **ES Appendix 8-4: Summary of Heritage Setting Assessment** (Doc Ref. 6.3).<br><br>A full assessment of the potential effects of the BESS and on-site substation compounds is included within Sections 8-4. 8-9 of **ES Chapter 8: Cultural Heritage** (Doc Ref 6.1) and **ES Appendix 8-4: Summary of Heritage Setting Assessment** (Doc Ref. 6.3). |
| Lincolnshire County Council | **Gazetteer coverage and asset mapping**<br><br>The mapping of heritage assets (PEIR Volume II List of Figures) is helpful but reflects the constrained study area and omits assets that are likely to be impacted by long-range infrastructure beyond 1km. In its current format, the gazetteer underrepresents a number of potential receptors, especially in relation to setting. The Council would welcome the opportunity to discuss how coverage may be extended in light of this issue. | N | Following discussion with LCC's Historic Landscape Officer, the study area for the Grid Connection Corridor has been expanded to 2km. In addition, assets of high importance within a 5km radius have been considered in the assessment. This is reflected in **ES Appendix 8-2 HEDBA** (Doc Ref. 6.3), the assessment of impacts and likely significant effects within **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) and the figures supporting both. A specific appendix addressing the setting of heritage assets has also been included which is contained within **ES Appendix 8-4: Summary of Heritage Setting Assessment**. |
| Lincolnshire County Council | **Use of regional historic environment frameworks**<br><br>While it is acknowledged that the PEIR cites both the Greater Lincolnshire Historic Farmstead Character Statement and the Lincolnshire Historic Landscape Characterisation Project, their application is limited. These resources are standard practice in heritage assessments in the county and | N | The Lincolnshire Historic Landscape Characterisation Project and information on historic farmsteads have been used to inform the baseline for the assessment presented in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). Figures detailing the landscape character are provided. An assessment of the |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | should be used to classify and interpret settlement form, enclosure patterns, and farmstead development.<br><br>There is scope to integrate these frameworks more fully into the baseline appraisal and assessment narrative of the ES, particularly when considering the significance of non-designated rural heritage assets and the wider landscape character context. Mapping of Historic Landscape Characterisation (HLC) zones and application of the farmstead typology would be helpful in this regard for greater context within the ES. | | potential effects on the setting of historic farmsteads has been undertaken. See Section 8-6 and Section 8-9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1), **ES Appendix 8-2: HEDBA** and **ES Appendix 8-4: Summary of Heritage Setting Assessment** for further details. |
| Lincolnshire County Council | **Visual Assessment Methodology**<br><br>A more thorough programme of viewpoint analysis and photomontage production is expected for the ES, particularly where receptors such as Conservation Areas or prominent listed buildings are concerned.<br><br>Zones of Theoretical Visibility (ZTV) should be provided for each major infrastructure element (e.g. grid pylons, substations, BESS compounds, Inter-Array overhead lines) where feasible. Clarification of visual impact methodology would be welcomed in advance of the ES. | N | Figures detailing the ZTV for each major infrastructure element are provided within **ES Figure 12-10 to Figure 12-18** (Doc Ref. 6.3). Landscape photo sheets (**ES Figure 12-21 and 12-22** (Doc Ref. 6-2)) of various viewpoints have been provided as part of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and are referred in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). The methodology was discussed with the Historic Landscape Officer. |
| Lincolnshire County Council | **ES recommendations**<br>To strengthen the forthcoming ES, the following measures as recommended:<br>• Extend the setting study area to 2km for all non-designated above-ground heritage assets and 5km for all designated assets, with justification for any alternative approach.<br>• Provide separate ZTVs and setting appraisals for the Grid Connection Corridor and Inter-Array Areas, particularly where overhead lines are proposed.<br>• Undertake setting assessments for all heritage assets that may be affected by tall infrastructure, including BESS, substations, and pylons.<br>• Expand use of the Lincolnshire HLC and Farmstead Character Statement to inform landscape and rural asset analysis<br>• Incorporate photomontages and visualisations from key viewpoints, particularly from sensitive receptors such as Conservation Areas<br>• Ensure cumulative/combined visual impacts are fully addressed in relation to the number and distribution of vertical structures proposed across the site.<br>The Council would be pleased to discuss the proposed scope of heritage assessment ahead of ES submission and welcome continued engagement as the project develops. | N | Following discussion with LCC's Historic Landscape Officer, the study area for the Grid Connection Route has been expanded to 2km to better reflect potential setting effects. In addition, assets of high importance within a 5km radius have been considered in the assessment. The approach seeks to balance proportionality with the extent and nature of the proposed infrastructure. See Section 8-4 and 8-9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1).<br><br>ZTV figures have been prepared for each major infrastructure element, including the Grid Connection Route and Inter-Array Connections, as presented within the ES. Landscape photo sheets and visualisations from selected viewpoints, including sensitive receptors, have been provided as part of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and are referred to in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). The methodology was discussed with the Historic Landscape Officer.<br><br>The Lincolnshire Historic Landscape Characterisation Project and information on historic farmsteads have been used to inform the baseline for the assessment presented in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). Figures detailing the landscape character are provided. An assessment of the potential effects on the setting of historic farmsteads has been undertaken. See Section 8-6 and Section 8-9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1), **ES Appendix 8-2: HEDBA** and |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | | | **ES Appendix 8-4: Summary of Heritage Setting Assessment** for further details. |
| Lincolnshire County Council | **Archaeology**<br><br>The Applicant has undertaken a number of consultation meetings with the Council regarding historic environment considerations relating to the proposed Meridian Solar Scheme. The Applicant has provided the geophysical survey and aerial assessment reports in a timely fashion, and this has facilitated early consideration of the approach to integrating the historic environment into design parameters.<br><br>There is some concern that fieldwork is being undertaken fairly late within the overall project programme as the DCO submission is anticipated to be November 2025 and intrusive trenching has not yet commenced. However, a Written Scheme of Investigation (WSI) has been provisionally agreed, and trenching should start shortly so the Council's concern is relatively minor. The evaluation trenching results will form the baseline site-specific evidence and should be used both to inform the design process and to minimise the impact on the historic environment through an appropriate program of archaeological mitigation. This is in accordance with the National Policy Statement for Renewable Energy Infrastructure (EN-3) which states that '*The results of pre-determination archaeological evaluation inform the design of the scheme and related archaeological planning conditions*.'<br><br>The WSI includes trenching across known or suspected archaeology to determine their presence or absence, depth, extent and significance and also across the 'blank' areas to obtain baseline evidence where previous non-intrusive evaluation techniques have not identified archaeological remains. This will allow a full understanding of the archaeology which may be present across the full impact zone and will inform the archaeological mitigation strategy which will be agreed as part of the DCO process. Significant areas of archaeology have been identified in these blank areas in every other NSIP across Lincolnshire and it is anticipated that this will be the case at the Meridian scheme.<br><br>Historic England Advice Note 17: Planning and Archaeology2 states that 'Appropriate evaluation can support the smooth and speedy progression of the development and help to manage the developer's risk early in the planning process' (section 131). It also states that '*Data gathered can also help to inform a costed mitigation strategy, the benefits of which include a reduction in the chances of unexpected risks and associated costs, and potentially the scope to allocate the cost of archaeology appropriately into financial forecasts'* (section 132). | N | Archaeological evaluation trenching has been undertaken to support the application. This work has been undertaken in consideration of the ground conditions and cropping cycle. At the time of application submission full results of the evaluation available and so preliminary results have been used to inform the assessment which are sufficient for the application submission. Post-excavation assessment and reporting is ongoing, and the results will be available within the DCO examination period. Consultation with LCC has been ongoing throughout the evaluation trenching process and results will be provided to the Archaeological Advisor as they become available. |
| Lincolnshire County Council | **Archaeology**<br><br>There is some concern regarding the hydrological impacts that may occur during the operational phase of the development and how this may be monitored and assessed during this phase. The Applicant has been asked to consider this as part of the evaluation process, including the geoarchaeological investigations, so that an understanding of the archaeological and paleoenvironmental significance can | N | An assessment of the potential effects on the archaeological and paleoenvironmental significance of the area based on the preliminary evaluation trenching and consultation with hydrology and drainage specialists has been undertaken and is reported in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). Further details of the palaeoenvironmental significance will be presented in the final fieldwork report. |

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| | be understood, a baseline established and future monitoring included within the hydrological requirements agreed as part of the DCO. This should be added to the Register of Commitments.<br><br>The Council is pleased that archaeology and cultural heritage is mentioned within the Stage two consultation information booklet, although it is relatively limited. The Council would encourage the Applicant to identify cultural heritage as an opportunity within the community benefits section, as archaeology and heritage can bring great public benefits both locally and to specific groups through targeted engagement. The Council would also like to raise the absence of archaeology and cultural heritage in the 'our vision objectives' set out in the Stage Two Consultation Banners. The scheme design states that avoiding known areas of heritage importance will be a key development but nothing about enhancing the historic environment and identifying public benefit from cultural heritage opportunities. | | |
| Lincolnshire County Council | **Archaeology**<br><br>The project is employing the Rochdale Envelope approach (Peir Volume I Chapter 2: The Scheme Section 2.5). Where the developer proposes the Rochdale Envelope in dealing with their application, for archaeology this approach can only be effective when there is adequate evaluation or commitment to undertaking sufficient evaluation leading to an understanding of the archaeological potential within areas of ground impact, once known. This is essential so that the impacts of the unknown and/or undecided elements, as well as the more fixed components of the development, can be mitigated effectively.<br><br>The Planning Inspectorate's Advice Note 9 states that *'Implementation of the Rochdale Envelope assessment approach should only be used where it is necessary and should not be treated as a blanket opportunity to allow for insufficient detail in the assessment. Applicants should make every effort to finalise details applicable to the Proposed Development prior to submission of their DCO application. Indeed, as explained earlier in this Advice Note, it will be in all parties' interests for the Applicant to provide as much information as possible to inform the Pre-application consultation process.*' (paragraph 5.2). | N | Archaeological evaluation undertaken to date is proportionate to the scale and nature of the Scheme and has been designed to provide the level of detail necessary to inform the assessment and mitigation strategy. Every effort has been made to complete and report on the archaeological evaluation within the scope agreed with the relevant statutory consultees. The findings will ensure that the use of the Rochdale Envelope is supported by a sufficient understanding of archaeological potential across all areas of anticipated ground impact, enabling effective mitigation of both defined and flexible elements of the Scheme. See Section 8-6 and Section 8-9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1), **ES Appendix 8-2: HEDBA** (Doc Ref. 6.3) and **ES Appendix 8-3: Summary of Solar Development Area Heritage** (Doc Ref. 6.3) for further details. |
| Lincolnshire County Council | **Archaeology**<br><br>The Council has substantial concerns regarding the proposed construction methodology for where feet are used for the Solar PV foundations (Table 2-1 Design Parameters for the Preliminary Assessment). These indicate that where feet are proposed, concrete pads would be installed at a depth below ground level up to approximately 0.5m. This would mean that this technique is unsuitable for protecting areas of archaeological remains, most of which would be encountered at this depth and thus harmed during the installation of the concrete pads. Preservation in-situ of archaeological remains would require no intrusive ground works.<br><br>Once the areas of impact resulting from the inter-array areas (paragraph 2.7) and grid connection corridor (paragraph 2.8) are known, targeted archaeological evaluation trenching can be agreed and undertaken. | N | The proposed construction methodology for module mounting structures for the solar PV panels has been considered as part of the impact assessment and development of the archaeological mitigation and management strategy.<br><br>Module mounting structures for the solar PV panels would be mounted via galvanised steel poles installed into the ground. Concrete feet would only be used in areas where steel poles cannot be used due to ground conditions/existing utilities. See Section 8-6 and Section 8-9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1), **ES Appendix 8-2: HEDBA** (Doc Ref. 6.3) and **ES Appendix 8-3: Summary of Solar Development Area Heritage** (Doc Ref. 6.3) for further details. |

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| | | | It is agreed that once the areas of impact resulting from the Inter-Array Connections and Grid Connection Route are known, targeted archaeological evaluation trenching will be undertaken at detailed design. |
| Lincolnshire County Council | **Archaeology**<br><br>Regarding the Surface Water Drainage, the Council would anticipate archaeological impacts would be included within the Drainage Strategy, which will be agreed prior to the construction phase (paragraph 2.10.2). Drainage mitigation has the potential to cause harm to archaeological remains and therefore adequate and appropriate consideration of the historic environment within the Strategy is essential to avoiding unnecessary harm. Where ground raising is required for flood risk (paragraph 2.5.12), potential archaeological impacts from compaction should be considered.<br><br>Where trenchless installation methods are proposed (paragraph 2.7.7), archaeological impacts should be considered at the entry and exit pits.<br><br>The Council is pleased to see that the Construction Environmental Management Plan (CEMP)(paragraph 2.12.22) will include cultural heritage. However, archaeology and cultural heritage should also be included in the Landscape and Ecological Management Plan (paragraph 2.12.24) and the Decommissioning Environmental Management Plan (paragraph2.14.5) and potentially the Operational Environment Management Plan (paragraph 2.13.8). | N | **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) has been prepared as part of the DCO Application. The Scheme design has been developed in consideration of potential effects on the archaeological deposits.<br><br>Potential effects on archaeological deposits as a result of **ES Appendix 11-4 Outline Drainage Strategy** (Doc Ref. 6.3) has been considered. See Section 8-6 and Section 8-9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1), and **ES Appendix 8-3: Summary of Solar Development Area Heritage** (Doc Ref. 6.3) for further details.<br><br>Trenchless installation methods have been considered as part of the impact assessment and appropriate mitigation will be included in the archaeological mitigation and management strategy secured by Requirement 11 as part of the **Draft DCO** (Doc Ref. 3.1). See Section 8-9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1).<br><br>Cultural Heritage has been considered in the **OCEMP** (Doc Ref. 7.10); **OOEMP** (Doc Ref. 7.11); **ODEMP**(Doc Ref. 7.12); and **OLEMP** (Doc Ref. 7.16). |
| Lincolnshire County Council | **Archaeology**<br><br>Within the Decommissioning Phase, it is stated that '*it is assumed that any below ground infrastructure would be left in situ following decommissioning*' (paragraph 2.14.1). The Council would like clarity on exactly what infrastructure will remain in the ground following decommissioning and how this may impact buried archaeological remains, especially if they deteriorate or their constituent parts break down, and the collateral effects on future archaeological surveys.<br><br>The Council notes in the decommissioning section that '*Post-decommissioning, the landowner may return land to arable use*' (paragraph 2.14.2) but as a decision of the landowner this is considered by the Applicant as out of their control. In the event that trees are not retained there could be significant below ground impacts which would damage or destroy any surviving archaeology without recording or identification. It is essential therefore that any area of planting, once confirmed, are included in the evaluation programme so that areas of archaeological sensitivity can be avoided and/or mitigated, as appropriate. | N | The mode of any underground cable decommissioning will be dependent upon landowner agreement, Government policy and best practice at that time. The assessment in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) has been undertaken based on the assumption that cables will be left in-situ.<br><br>Areas of planting have been developed with consideration to potential archaeology. Assessment of potential effects as a result of environmental mitigation measures has been included in the assessment presented in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). Appropriate mitigation will be included in the archaeological mitigation and management strategy which is secured by Requirement 11 of the **Draft DCO** (Doc Ref. 3.1).<br><br>In terms of the comment regarding the need for early use of non-intrusive surveys to inform site selection, consideration of |

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| | PEIR Volume I Chapter 3: Alternatives and Design Evolution states that *'it is preferable to site solar development on land with low levels of archaeological interest and without designated sites, such as scheduled monuments, listed buildings and conservation areas'* (Section 3.2.17). Given the apparent extent, complexity and significance of archaeological remains within the site, this reinforces the need for early use of non-intrusive surveys when undertaking site selection. The Council would also recommend the use of innovative techniques which may be available to rapidly evaluate and inform site selection. | | archaeological potential and heritage importance was used to inform the design as set out within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). For instance, the siting of Scheme infrastructure has considered areas of potential archaeology and habitat management areas have been specified to preserve areas with high potential for below ground archaeology. |
| Lincolnshire County Council | **Archaeology**<br>The Council is pleased to see that the design evolution is being undertaken on an iterative basis (paragraph 3.4.1) and that '*the design of the PV Area has been refined iteratively, accounting for environmental and technical considerations while incorporating feedback from statutory and non-statutory consultees, including the local community and relevant authorities'*. However, the Council is concerned that the only design parameter for cultural heritage is *'Avoidance of infrastructure within scheduled monuments'* (Table 3-2 PV Area Design Parameters). This is disappointing and it is felt that greater weight should have been applied to the design parameters to preserve cultural heritage assets through embedded mitigation in the design phase. | N | Consideration of archaeological potential and heritage importance of all assets, not just Scheduled Monuments, was used to inform the design. For further details on consideration of alternatives please refer to **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). |
| Lincolnshire County Council | **Archaeology**<br>In relation to PEIR Volume I Chapter 6: Cultural Heritage, the Council has some concerns over Table 6-2 Scope of Assessment in Relation to Cultural Heritage and the scoping out of physical effects on heritage assets during the operational phase. As stated previously, given the significance and potential sensitivity of the earlier prehistoric land surfaces, basal peat deposits and paleoenvironmental remains, any changes to hydrology during the operational phase of the solar farm could impact these deposits. Long-term effects can include desiccation to peats, changes to previously anaerobic conditions, resulting in loss of organic preserved remains and chemicals leaching into previously sterile archaeological deposits. It is considered that until further assessment and clarity has been provided on this subject, operational phase impacts should not be excluded. | N | An assessment of the potential effects on the archaeological and paleoenvironmental significance of the area based on the preliminary evaluation trenching and consultation with hydrology and drainage specialists and is reported in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). Further details of the paleoenvironmental significance will be presented in the final fieldwork report. Appropriate mitigation will be included in the archaeological mitigation and management strategy which is secured by Requirement 11 of the **Draft DCO** (Doc Ref. 3.1). |
| Lincolnshire County Council | **Archaeology**<br>The Council welcomes the completion of the geophysical survey and aerial photography and LiDAR assessment for the PV areas (paragraphs 6.4.9 and 6.4.10) and looks forward to the results of the forthcoming surveys for the grid connection corridor and inter-array areas. Overall, the assessment and survey work undertaken to date and forthcoming field evaluation will allow for the scheme design to be appropriately informed and the development of an adequate and fit for purpose mitigation strategy.<br>The Council however would urge caution regarding assumptions that may not be feasible, such as that '*It has been assumed that compounds and access points would be located in the same locations during the construction and decommissioning phases*' (paragraph 6.5.2). The intervening period of 40 years between | N | The Applicant notes this comment. |

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| | construction and decommissioning may mean that compound locations may need to be relocated and thus it is considered that this assumption is unreasonable. | | |
| Lincolnshire County Council | **Archaeology**<br>The use of embedded mitigation into the design scheme is welcome and the Council is pleased to see that the current anticipated layout of solar PV modules has also been designed to avoid impacts on dense groupings of buried archaeological remains that have been identified within the PV Area (paragraph 6.7.1). The Council would like to note that it is likely that other, hitherto unidentified, areas of significant archaeological activity could be present and therefore would advise that the scheme design retains some degree of flexibility until the archaeological evaluation and assessment has been completed.<br>In relation to the areas designed out of the scheme due to the presence of complex and significant archaeology, it is envisaged that the appointed Archaeological Clerk of Works will be responsible for monitoring archaeological mitigation measures for the preservation in situ areas and will need to be included in their CEMP to ensure the protection measures stay in place throughout the development. | N | Consideration of archaeological potential and heritage importance, including results of archaeological evaluation was used to inform the design. For further details on consideration of design evolution please refer to **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). The final results of the archaeological evaluation will be used to inform the archaeological mitigation and management strategy which is secured by Requirement 11 of the **Draft DCO** (Doc Ref. 3.1).<br>A preliminary approach to mitigation has been developed using the data gathered from the desk-based and field evaluation phases. The requirement for detailed management strategy and an Archaeological Clerk of Works will be informed by the further results of the evaluation and the detailed understanding of the significance and extent of the archaeology within the Site. The final results of the archaeological evaluation will be used to inform the archaeological mitigation and management strategy which is secured by Requirement 11 of the **Draft DCO** (Doc Ref. 3.1). . |
| Lincolnshire County Council | **Archaeology**<br>The Council disagrees with the statement in paragraph 6.8.6 that '*No permanent effect upon heritage assets as a result of the operation of the Scheme is anticipated*'. Comments have been provided regarding archaeology and changes to hydrology above. PEIR Volume 1, Chapter provides information on the replacement of the BESS Units after 20 years, however no information is provided regarding the potential replacement of PV mounting structures, the Council would like to stress that should this be a necessary operational activity this would increase the ground impact of piling and the associated cables across the solar array areas.<br>Paragraph 6.8.9 states that '*No additional permanent impacts are anticipated during decommissioning, as the decommissioning works should be contained to the same already-disturbed footprint as the construction phase, and as such, there would be no direct physical impact upon any additional archaeological remains'*. There is no justification provided for this statement given that the exact decommissioning methodology is unknown and that the removal will be undertaken '*in accordance with the relevant statutory process at the time'* (paragraph 6.8.41).<br>The commitment that '*Further evaluation will be undertaken to confirm the importance of these archaeological deposits and the ultimate significance of the effect'* is welcome and recognises that the | N | Consideration of potential impacts as a result of the operation and maintenance, including any replacement activities, of the Scheme has been undertaken as part of the assessment presented in Section 8-9 and 8-10 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). Assessment of the potential of hydrological changes has also been undertaken.<br>The comments around the assumption are noted. As it is not possible to anticipate where compounds and access points would be located at decommissioning recommendations are included in the **Outline DEMP** (Doc Ref. 7.12) in relation to mitigation in the event that the compounds and access points are in a different location. The Detailed DEMP will be subject to consultation and agreement with the LCC in line with Requirement 21 of the **Draft DCO** (Doc Ref. 3.1).<br>The evaluation was appropriate and proportionate to support the assessment of potential impacts to support the EIA process. |

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| | significance of the remains outside, but adjacent to the Scheduled Monuments may be of equivalent significance (paragraph 6.8.18). | | |
| Lincolnshire County Council | **Archaeology**<br><br>The additional mitigation and enhancement measures are relatively brief at present, albeit acknowledging the iterative process underway. The Council appreciates that the Applicant is committed to a fit for purpose mitigation strategy but would point out that sufficient and proportionate archaeological evaluation is required within areas of ground impact to enable the development of the mitigation strategy. The Applicant's approach for the *'exact nature of this archaeological mitigation will be determined following archaeological evaluation trenching to determine the nature, extent and significance of the buried archaeological deposits identified during the desk-based assessment'* (paragraph 6.9.2) is acceptable given that the extent of impacts is not known at this present stage and a blanket approach to trenching is neither warranted or an effective use of resources. The Council would advocate targeted and site-specific trenching once designs have been finalised rather than a blanket approach.<br><br>The mitigation strategy is likely to require specific areas of archaeological excavation and recording. The methodology for the archaeological mitigation would be detailed within an overarching scheme design and an archaeological mitigation strategy.<br><br>However, it should be stated overall that the approach, communication and proposed further works by the Applicant has been promising and the Council is positive that the historic environment will be appropriately considered within the Meridian DCO process. Although absent from the PEIR documents, the Council would expect a Public Archaeology and Community Engagement statement in any DCO submission, with agreed provisions for engagement and benefits set out maximising the results of the cultural heritage works. | N | The evaluation was appropriate and proportionate to support the assessment of potential impacts to support the EIA process. Consultation with LCC was ongoing through the development and implementation of the evaluation excavations.<br><br>The detailed archaeological mitigation and management strategy, including measures for public engagement and dissemination, will be informed by the further results of the evaluation and the detailed understanding of the significance and extent of the archaeology within the Site. Implementation of the measures set out in the archaeological mitigation and management strategy are secured by Requirement 11 of the **Draft DCO** (Doc Ref 3.1), which requires that the detailed CEMP be prepared in substantial accordance with the **Outline CEMP** (Doc Ref. 7.10). |
| Lincolnshire County Council | **Archaeology**<br><br>A number of ecological mitigation and enhancement measures have the potential for incidental harm to the historic environment. New hedgerows (Section 7.9.1), enhancement of watercourses and wildflower planting (paragraph 7.9.3) have the potential to impact below ground archaeological remains. Paragraph 7.9.3 specifically identifies the potential for ecological enhancement of land set aside due to the presence of archaeological deposits, albeit subject to further investigation. The Council would urge due caution prior to any ecological mitigation or enhancement being proposed in areas of complex, significant and potentially sensitive archaeological activity. Planting/seeding of wildflowers can in particular be harmful as it involves the inversion of the subsoil from below the topsoil to above it, with any archaeological remains located within that area suffering from the machinery used to move soils and compaction from the movement of the heavy plant. | N | Areas of planting have been developed with consideration to potential archaeology. Assessment of potential effects as a result of environmental mitigation measures has been included in the assessment presented in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). |
| Lincolnshire County Council | **Archaeology**<br><br>The PEIR Volume I Chapter 8: Hydrology, Flood Risk and WFD contains mitigation measures which have the potential to cause harm to archaeological remains, if undertaken without appropriate prior | N | Mitigation relating to hydrology and flood risk are presented **in ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). This has been considered as part of the impact assessment in relation to |

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| | evaluation. The Council would require greater clarity on actions such as the construction phase management system to manage works within watercourses/drains and floodplains and what exactly this entails (paragraph 8.7.2) and the operational phase implementation of SuDS (i.e. swales) where appropriate (paragraph 8.7.2). Appropriate archaeological mitigation measures can only be implemented if the location ground impacts is known. Paragraph 8.8.2 lists some further activities - *clearance of vegetation, topsoil stripping and stockpiling, establishment of compound areas, excavation and Site re-profiling to create construction platforms, preparation of Site access tracks and construction of foundations* – which could also cause harm to archaeological remains and thus will need to be considered, once final design has completed and site-specific and targeted archaeological trenching can be undertaken.<br><br>Within paragraph 8.8.17, the installation of temporary drainage/de-watering measures may have impacts to archaeological deposits. Consequently, it is expected that the locations of drainage/de-watering, once known, to be included within the programme of archaeological evaluation. De-watering in particular can have significant impacts on archaeological deposits that are waterlogged.<br><br>Where ground raising is proposed, for the BESS, solar stations and on-site substations (paragraph 8.8.41), it is likely that archaeological evaluation will need to be undertaken in advance so that archaeological remains can be identified and appropriate mitigation implemented. | | archaeological deposits and will inform the development of the archaeological mitigation and management strategy secured by Requirement 11 of the **Draft DCO** (Doc Ref. 3.1). |
| Lincolnshire County Council | **Archaeology**<br><br>There are details within the PEIR Volume I Chapter 9: Agriculture and Soils that require further clarity, given the potential for harm to occur to the historic environment from these activities. Paragraph 9.7.4 describes the use of stone pads that would be utilised for heavy equipment such as cranes and piling rigs to provide a stable working area and reduce disturbance to the ground and soil compaction. Details on how these would reduce compaction and if any topsoil or subsoil removal would be required prior to installation of the stone pads is needed.<br><br>The Council welcomes the statements that works will be undertaken during dry conditions to reduce impacts to soils (for example paragraph 9.8.11). This is likely to also reduce the dangers of compaction and rutting from heavy plant, which can harm underlying archaeological remains. | N | The use of stone pads that would be utilised for heavy equipment such as cranes and piling rigs would coincide with the compounds and substation locations. This has been considered as part of the impact assessment for these locations presented in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) and will inform the development of the archaeological mitigation and management strategy secured by Requirement 11 of the **Draft DCO** (Doc Ref. 3.1). |
| Lincolnshire County Council | **Archaeology**<br><br>The Council feel that the nationally significant archaeological remains designated as Scheduled Monuments could feature more prominently within the PEIR Volume I Chapter 10: Landscape and Visual (paragraph 10.6.27). A section covering heritage receptors was anticipated but any such assessment is lacking entirely from Chapter 10. It should as a minimum cross reference to the PEIR Volume III Appendix 6-3: Summary of Heritage Setting Assessment.<br><br>Additional mitigation and embedded measures may also have harmful effects on archaeological remains and once areas of indicative planting (paragraph 10.9.1) have been fixed, archaeological impacts should be considered and assessed appropriately based on the level of anticipated ground impact. This is particularly the case where small blocks of woodland are proposed (paragraph 10.9.3). | N | Areas of planting have been developed in consultation with consideration to potential archaeology. Assessment of potential effects as a result of environmental mitigation measures has been included in the assessment presented in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) and will inform the development of the archaeological mitigation and management strategy secured by Requirement 11 of the **Draft DCO** (Doc Ref. 3.1). |

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| | The Council is also conscious that areas set aside from development due to the presence of significant and complex archaeological remains are being considered as possible areas for planting and other mitigation. Due care and consideration should be given to this and any decisions made should be based on an understanding of the scale, sensitivity and extent of any archaeological remains within that location.<br><br>The Council welcomes the opportunity identified in paragraph 10.9.5 to enhance the visitor experience through introduction of information boards focused on the relevant heritage, archaeological, ecological, climate and energy aspects of the surrounding area and the Scheme. | | |
| Lincolnshire County Council | **Archaeology**<br><br>A number of the embedded mitigation described in the PEIR Volume I Chapter 13: Traffic and Access will need to be assessed for archaeological impacts. These include the creation of junction bellmouths, upgrading of routes to cater for larger vehicles, creation of waiting spaces for vehicles to ensure no queuing onto the surrounding road network and sufficient on-site car parking (paragraph 13.9.4). Once the locations of these infrastructure improvements are known, a targeted and site-specific archaeological assessment should be undertaken.<br><br>Again, the Council would ask for archaeological impact assessment to be undertaken for any additional mitigation and enhancement measures, such as local off-Site highway improvements (e.g. verge clearance, hedge cutting and/or carriageway widening), once known (paragraph 13.11.3). | N | The assessment of traffic and access requirements as a result of the Scheme is presented in **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1). Elements of traffic and access design are included in the scheme description and are considered as part of the heritage impact assessment and will inform the development of the archaeological mitigation and management strategy secured by Requirement 11 of the **Draft DCO** (Doc Ref. 3.1). |
| Lincolnshire County Council | **Archaeology**<br><br>The Council is pleased to see Cultural Heritage commitments have been made within the PEIR Volume Iii Appendix 3-1: Commitments Register. The Council would like to add that although '*Solar PV modules have been excluded from areas within land parcel C-2-01, C-2-03, C-1-01, C-1-03, C-1-08, C-2-04, and C-2 where potentially sensitive archaeological deposits have been identified*' (Table 1 PEIR Commitments Register), a degree of design flexibility should be retained once the full impact zone is known and archaeological evaluation has taken place. In every other NSIP across Lincolnshire, there has been previously unknown archaeological remains encountered during the evaluation phase which 12 were not picked up from the desk-based, geophysical or aerial and LiDAR assessments.<br><br>The proposed mitigation within the Commitments Register for solar PV modules to be mounted on concrete feet within identified areas of the highest archaeological sensitivity to ensure remains are left in situ would only be acceptable if the feet were **non-intrusive**. Currently, the concrete feet would involve concrete pads installed at a depth below ground level up to approximately 0.5m (Table 2-1 Design Parameters for the Preliminary Assessment) and this would likely cause unacceptable harm within areas of the highest archaeological sensitivity. The Council is particularly keen on viewing and contributing to the various management plans, especially the CEMP, to ensure activities which may result on harm to archaeological remains have been identified and appropriately considered once the designs have progressed sufficiently for site-specific impacts to be understood. | N | The Applicant notes the comment. The approach to archaeological mitigation recognises the potential for previously unknown remains to be identified through further evaluation, and appropriate design flexibility will be retained to respond to findings once the full impact zone is understood.<br><br>Archaeological mitigation for the Scheme is secured by Requirement 11 of the **Draft DCO** (Doc Ref. 3.1), which requires the preparation and approval of a final Archaeological Mitigation and Management Strategy and site-specific written scheme of investigation, to be submitted to and approved by LCC. These documents must be substantially in accordance with the Outline Archaeological Mitigation and Management Strategy and will be informed by the results of archaeological evaluation, allowing appropriate flexibility in design and mitigation once the full extent of archaeological interest is known. This will be submitted within the examination period.<br><br>The Applicant notes the Council's concerns regarding the potential impacts of concrete pad foundations in areas of highest archaeological sensitivity. The suitability, depth and intrusiveness |

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| | | | of any foundations in such areas will be informed by archaeological evaluation and addressed through the approved AMMS and WSIs to ensure that archaeological remains are preserved in situ where appropriate. |
| Lincolnshire County Council | **Chapter 7: Ecology and Biodiversity**<br>**Main Overarching comments**<br>• The Council is of the opinion that survey work undertaken to date employs appropriate methods and appears to have been undertaken to a good standard.<br>• The Council notes that ecological surveys are ongoing and will continue into 2025. The Council will be happy to provide additional comments when the results of this additional work are available.<br>• The Applicant has undertaken a data search against records held in the Lincolnshire Environmental Records Centre hosted by the Greater Lincolnshire Nature Partnership. This has ensured that sites protected or important at international, national and local levels have been correctly identified.<br>• The Council notes that final details of construction methods and site design have not yet been fully determined and hence impacts on ecology such as extent of the losses of certain habitats, both temporary and permanent cannot yet be fully identified. The Applicant should ensure that the impacts of the final design and construction methodology are fully assessed in the ES.<br>• The Council notes the Applicant's intention to include details of measures to ensure the protection of sensitive ecology within a Construction Environmental Management Plan (CEMP) and will be happy to provide additional comments when a draft CEMP is available. | N | The Applicant notes this comment and welcomes the positive feedback on the scope and quality of the ecological survey work undertaken to date. Lincolnshire County Council have been engaged on the surveys that have progressed through 2025/early 2026. The results of this work have informed the assessment presented within the **Environmental Statement** (Doc Ref 6.1, 6.2 and 6.3).<br>The assessment within the ES considers the likely significant effects of the Scheme based on the final design parameters and construction methodology, applying a reasonable worst-case approach where details remain subject to refinement. Measures to ensure the protection of sensitive ecological receptors during construction have been included within the **OCEMP** (Doc Ref. 7.10). |
| Lincolnshire County Council | **Chapter 7: Ecology and Biodiversity**<br>**Main Overarching comments**<br>• The Council welcomes the Applicant's commitment to the development mitigation and enhancement measures to various species and species groups but advises that the applicant should ensure clarity around which measures are mitigation and which are genuine enhancement.<br>• Little information is currently presented about the potential design and layout of ecological mitigation and enhancement including opportunities for delivering BNG, but the Council notes the Applicant's intention to develop this area as the environmental assessment work progresses. The Council would welcome the opportunity to provide further input to the detailed design of new habitats to be established on site at the appropriate stage.<br>• The Council notes the Applicant's intention to produce a Biodiversity Net Gain (BNG) Assessment (Volume III Appendix 7-1, Para 2.13). Whilst the delivery of a minimum of 10% | N | Mitigation and enhancement measures embedded within the Scheme are summarised within Section 9.7 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). Furthermore, Section 9.8 of the chapter identifies where the measures embedded within the Scheme would result in net beneficial effects to ecological receptors, and, therefore, provide an enhancement.<br>Ecological mitigation and enhancement areas to be provided by the Scheme are secured through the **OLEMP** (Doc Ref. 7.16), which sets out the ecological strategy for the Scheme, including proposals for the provision of new planting, habitat boxes, habitat piles and hibernacula. The **OLEMP** (Doc Ref. 7.16) also specifies management and monitoring requirements for these measures provided by the Scheme. |

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| | BNG is not currently mandatory for NSIPs it is good practice. The Council would encourage the Applicant to maximise opportunities for the delivery of BNG and to seek to deliver significantly in excess of 10% given the scale and nature of the proposed development. The Council notes that the Applicant states that *"…these measures would deliver a significant net gain, well above the mandatory 10% currently in place through the Environment Act 2021…"*(Volume 1 Chapter 7, Para 7.9.4) and welcomes this. The Council advises that the delivery of BNG should be quantified by employing Defra's Statutory Biodiversity Metric.<br>• Any commitments to the delivery of BNG submitted alongside the DCO application should be sufficiently detailed to give certainty as to the level of BNG that will be delivered if the applicant is seeking weight to be applied to this matter by the Examining Authority. Any gains in biodiversity and their monitoring and management will need to be appropriately secured in the DCO.<br>• The Council advises that Biodiversity Opportunity Mapping has been produced by the Greater Lincolnshire Nature Partnership and a Local Nature Recovery Strategy for Greater Lincolnshire is currently being developed. These documents will provide useful guidance when considering opportunities to deliver BNG and the establishment of new habitats. | | A biodiversity net gain assessment undertaken using Defra's statutory biodiversity metric is provided within the **Biodiversity Net Gain (BNG) Report** (Doc Ref. 7.9). The **Draft DCO** (Doc Ref. 3.1) Schedule 2 Requirement 8 includes a commitment for the Scheme to achieve BNG in accordance with the **BNG Report** (Doc Ref. 7.9) and the **OLEMP** (Doc Ref. 7.16).<br>Habitat management measures aimed at improving biodiversity through optimal plant species selection and management practices, considering the Biodiversity Action Plan priorities of Lincolnshire, are detailed in the **OLEMP** (Doc Ref. 7.16). |
| Lincolnshire County Council | **Botanical interest:**<br>The Council notes that data from any detailed botanical surveys is not included in the PEIR. The applicant should ensure that they have undertaken sufficiently detailed and appropriately timed botanical survey work to be confident that the presence of any scarce arable plant species occurring on the site are detected and to inform the calculation of the baseline biodiversity values. | N | Species of botanical interest were noted as part of the habitat surveys and are reported within **ES Appendix 9-2: Preliminary Ecological Appraisal** (Doc Ref. 6.3). The need for a detailed botanical survey was scoped out, on the basis of the results of the preliminary ecological appraisal. |
| Lincolnshire County Council | **Ancient woodland:**<br>The Council advises that ancient woodland data for the county has recently been updated by the Greater Lincolnshire Nature Partnership. The Applicant may already have access to this data but should ensure that the most up to date information including from field surveys is being used to assess impacts. | N | Updated data searches of the Greater Lincolnshire Nature Partnership (the local biodiversity record centre) were completed in 2025 and early 2026, and incorporated within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) and the associated appendices. |
| Lincolnshire County Council | **Bats**<br>The Council notes that further surveys are planned to determine the level of bat activity and the presence of any roosts within the proposed boundary. Recent studies have shown a decrease in levels of bat activity associated with the presence of solar developments though reasons for this are not yet clearly understood. The applicant should ensure that bat surveys are appropriately timed and detailed to ensure that impacts on bats can be properly assessed in the ES. | N | Bat activity surveys were completed from April to October 2024 and ground level tree assessments were completed in August 2025. The surveys were completed in accordance with good practice guidelines, such as Bat Conservation Trust's guidelines[5] and BS 42020[6]; during the optimal survey seasons. The results of the surveys are presented within **ES Appendix 9-11: Bat Activity Survey Report** (Doc Ref. 6.3) and **ES Appendix 9-12: Bat Ground** |

[5] Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)*. The Bat Conservation Trust, London.
[6] British Standard 42020:2013 Biodiversity – Code of Practice for Planning and Development. BSI. Available at: https://shop.bsigroup.com/products/biodiversity-code-of-practice-for-planning-and-development [Accessed 07/11/2025]

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| | | | **Level Tree Assessment Survey Report Technical Note 2025** (Doc Ref. 6.3).<br><br>An assessment of impacts on bats is presented within Section 9.8 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |
| Lincolnshire County Council | **Breeding birds**<br><br>The Council advises that the applicant should ensure that adequate information is available to ensure that the impacts on breeding birds and in particular, ground nesting species such as skylark can be properly assessed in the ES.<br><br>The Council notes that surveys have detected the presence of populations of species listed on Schedule 1 of the Wildlife and Countryside Act. The presence of these species should be taken into account during construction to avoid offences potentially being committed.<br><br>Common Crane are known to be present in the area and the applicant should ensure that sufficient data is available to understand the potential for impacts on the species including via collision with any overhead lines<br><br>The Council advises that Lincolnshire Wildlife Trust is working to develop some best practice guidance for solar developments in Lincolnshire which seeks to identify strategic opportunities for ecological mitigation and enhancement linked to solar development including for ground nesting bird species. | N | Breeding bird surveys were completed in 2023 and are reported in **ES Appendix 9-3: Breeding Bird Survey Report** (Doc Ref. 6.3). In addition, summer vantage point surveys were completed in 2025 to identify and categorise notable bird species, including common crane, using the survey area and to map their flight paths and heights (see **ES Appendix 9-13** (Doc Ref. 6.3)). Disturbance to all sensitive breeding birds has been assessed in Section 9.8 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1), with survey data and the assessment informing the mitigation measures embedded within the DCO Application.<br><br>Information on common crane was also requested from Lincolnshire Wildlife Trust and the outcomes of the engagement have been used to inform the assessment presented within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |
| Lincolnshire County Council | **Wintering Birds**<br><br>The Council notes that surveys have detected the presence of a range of wintering bird species, some of which are likely to be associated with nearby designated sites. This includes a population of whooper swan which is likely to be of national significance. The applicant should ensure that sufficient data is available to understand the potential for impacts on wintering bird species including via collision with any overhead lines and disturbance. | N | Wintering bird surveys were completed between 2022 and 2025 and the survey results are presented within the following ES appendices:<br><br>• **ES Appendix 9-4: Wintering Birds Survey Report 2022-2023** (Doc Ref. 6.3);<br>• **ES Appendix 9-5: Wintering Birds Survey Report 2023-2024** (Doc Ref. 6.3);<br>• **ES Appendix 9-6: Grid Connection Route Wintering Bird Survey Report 2023-2024** (Doc Ref. 6.3); and<br>• **ES Appendix 9-10: Vantage Point Survey Report** (Doc Ref. 6.3).<br><br>Natural England were engaged in determining the scope of the wintering bird surveys. Outputs of these surveys include flight durations by species and height bands which have been used to inform the collision risk assessment for the Grid Connection Route presented within **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3). |

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| Lincolnshire County Council | **Terrestrial invertebrates**<br>The Council notes that terrestrial invertebrates have been scoped out of surveys. The Council advises that records obtained via desktop may be useful in aiding the design of ecological mitigation and enhancement measures to cater for the needs of any less common species. | N | Updated data searches of the Greater Lincolnshire Nature Partnership (the local biodiversity record centre) were completed in 2025 and early 2026, and incorporated within ES Chapter 9: Ecology and Biodiversity (Doc Ref. 6.1) and the associated appendices. |
| Lincolnshire County Council | **Invasive non-native species (INNS)**<br>The Council notes that INNS have been identified within the study area. Measures, appropriate controls and working methods aimed at preventing the spread of INNS should be set out in the CEMP. | N | Appropriate controls and measures aimed at preventing the spread of INNS have been set out within the **OCEMP** (Doc Ref. 7.10). |
| Lincolnshire County Council | **Habitats Regulations Assessment (HRA)**<br>Given the presence of several statutorily designated sites in the vicinity of the proposal, the Applicant will need to ensure that sufficient information has been submitted to allow HRAs to be undertaken. | N | Information to undertake an appropriate assessment has been presented within **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref. 6.3). The Applicant has engaged with Natural England throughout the pre-application period to determine the level of detail and information to be submitted as part of **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref. 6.3). |
| Lincolnshire County Council | **Cumulative effects**<br>There are several development proposals of varying scales in the vicinity of this proposal including other solar developments. A detailed assessment of the cumulative impacts of these proposals on sensitive ecological receptors in the area should be undertaken in the ES. This should include habitat change, as well as the magnitude of change, that would result from conversion of arable farmland to a solar farm, alongside other solar NSIP projects in the area. | N | A cumulative effects assessment, including with other NSIPs within the Zone of Influence of the Scheme, is presented within Section 9.11 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |
| Lincolnshire County Council | The Council's Infrastructure Ecologist will be happy to work with the Applicant, their consultants and other stakeholders throughout the EIA process to ensure that ecological elements of the application are properly addressed, and that scheme secures the maximum potential benefits for biodiversity. | N | The Applicant notes this comment. |
| Lincolnshire County Council | **Chapter 8: Hydrology, Flood risk and WFD**<br>The County Council as Lead Local Flood Authority (LLFA) has reviewed the PEIR and has provided the following comments:<br>With regard to surface water flood risk, paragraph 8.8.34 is agreed, subject to future details:<br>"*The solar PV modules themselves would have a negligible effect upon the surface water drainage regime, as rainwater would be shed to ground, such that it infiltrates. The battery storage system (BESS) and On-Site Substation Compounds, would give rise to an increase in the impermeable area within the catchment, thereby increasing surface run-off to the adjacent drains. This has the potential to increase flood risk to existing development/infrastructure/third party assets/land downstream. However, such effects would be controlled by the embedded mitigation measures outlined above, specifically a Drainage Strategy that controls surface water flows such that the surface water run-off regime replicates that existing prior to* | N | **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) has been developed in compliance with general SuDS guidance to ensure that surface water runoff from the development is managed appropriately. Sustainable drainage measures are incorporated to ensure that flood risk is not increased either on site or to surrounding areas. Full details of the surface water drainage provisions have been set out in the **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3) and **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3). |

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| | *development. Full details of provisions for surface water drainage will be set out in the FRA prepared in support of the DCO application."*<br><br>The Council await the details for the surface water drainage provision in the forthcoming FRA and Drainage Strategy. The Council will require mitigations and the Drainage Strategy to be compliant with general SUDs guidance (as referenced in paragraph 8.2.23). | | |
| Lincolnshire County Council | **Chapter 9: Agriculture and soils**<br><br>Part of the PV Area has already been surveyed in detail to Post-1988 MAFF ALC Guidelines (Natural England reference: ALCC05791). This land was found to be mainly of Subgrade 3a quality (approximately 122ha), with smaller areas of Grade 2 (approximately 31.1ha) and Grade 1 (approximately 4.6ha). Whilst a reconnaissance level Agricultural Land Classification (ALC) survey has occurred it is expected that a fuller ALC will be both necessary and required, not least because most of the preliminary assessment shows the site to be Best and Most Versatile (BMV) land, except Land Parcel D where the majority of the soils are considered to be or likely to be Grade 3b. The ALC so far has been undertaken by a specialist ALC firm but is only prepared at preliminary or reconnaissance level and is not yet of the standard expected by BSSS and the guidelines set out in MAFF 1988 and TIN049.<br><br>The soil auguring of the site should be undertaken in line with TIN 049 and the MAFF 1988 Guidelines, one auger point per hectare and with occasional soil pits particularly where soil types vary. On a site of this size the amount of auguring should be around 1,000+ auger holes and probably 6 or 8 pits to verify the soil profiles – more if there are significantly different soils. | N | Detailed ALC surveys for the Solar Development Area have been undertaken across the Solar Development Areas to inform the assessment presented in **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1). The ALC surveys were undertaken in accordance with TIN049 and MAFF 1988 guidelines. One auger per one hectare survey intensity was used across the Solar Development Areas, with the exception of the survey of Habitat Management Area where one auger per two hectares was applied. This was because this area is proposed to be retained in arable use with skylark plots, with no physical infrastructure proposed in this area. Areas of Scheduled Monuments and areas where World War II aircraft crash sites have been recorded within Land Parcels A and D were left unsurveyed to avoid impacts from ground disturbance on these sites. A small number of fields also had restricted access due to existing crops and use as horse paddocks, which were left unsurveyed as a result. The locations of auger points and areas surveyed are mapped in detail within **ES Appendix 5-2** and **5-3** (Doc Ref. 6.3).<br><br>Details of the ALC surveys are presented within **ES Appendix 5-2: Agricultural Land Survey – Parcels A&D** (Doc Ref. 6.1) and **ES Appendix 5-3: Agricultural Land Survey – Parcels B&C** (Doc Ref. 6.3). Provisional ALC mapping has been continued to be used for the assessment of the Inter-Array Connections and the Grid Connection Route. |
| Lincolnshire County Council | **Chapter 9: Agriculture and soils**<br><br>All arable land of whatever agricultural classification produces food, whether for animal feed or human consumption and this should be protected for its own sake. Within the project boundary is land classified BMV and the use of BMV land for this project would result in it being taken out of agricultural production. The use of BMV land should be kept to a minimum to reduce the impact on UK food security. Grade 1, Grade 2 and Grade 3a soils, which are considered to be BMV land, based on the reconnaissance ALC survey, based on a precautionary principal accounts for 73% of the total site area (paragraph 9.6.7). | N | The assessment within Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) considers the likely effects of the Scheme on agricultural land, including impacts arising from the Inter-Array Connections and Grid Connection Route.<br><br>At this stage, detailed ALC surveys for the Inter-Array Connections and the Grid Connection Route have not been undertaken due to the current flexibility in design and routeing.<br><br>A detailed soil survey will be undertaken post-consent once detailed design has been undertaken, as secured through the |

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| | It is noted in paragraph 9.4.7 that '*ALC surveys have not, to date, been carried out for the Grid Connection Corridor and Inter-Array Areas due to the current flexibility in the design and the consideration that ALC is not a differentiating factor in the development of the routeing for this Scheme'*. This however appears to be at odds with the statement in paragraph 2.2.3 regarding the inter-array areas which *'would be either overhead lines, underground cabling or a combination of both. The Inter-Array Areas will be further refined as the design of the Scheme develops prior to the submission of the DCO application*'. As no decision has been made on the inter-array transmission type or the route, detailed ALC surveys should be undertaken and considered as a factor in the decision. Paragraph 9.5.1 acknowledges the limitations to the accuracy of the published ALC data however detailed ALC survey data should be used in the refinement of the scheme. It is noted that the proposed approach to surveys in the Grid Connection Corridor and Inter Array Areas is being discussed with Natural England and will be reflected in the preparation of the ES. | | **OSMP** (Doc Ref. 7.14), which applies to all parts of the Scheme, including the Solar Development Areas, Inter-Array Connections and the Grid Connection Route. The OSMP ensures that soils are managed and reinstated to avoid long-term degradation of agricultural land quality. |
| Lincolnshire County Council | **Chapter 9: Agriculture and Soils**<br><br>It is acknowledged that the grid connection route has not yet been surveyed for ALC (paragraph 9.7.1) but should be surveyed in order to confirm land quality to ensure soils are properly managed if the project proceeds. Most of the grid connection route according to published ALC data route passes through predominantly Grade 1 land. Paragraph 9.8.14 states that *'The quantum of agricultural land involved is anticipated to exceed 50ha, but temporary, with the impact therefore considered of minor magnitude'*. This only appears to consider the impact at construction rather than the ongoing impact on agriculture. The proposals to construct 13km of overhead transmission lines to connect the solar array to the proposed substation at Weston March would permanently prevent areas of land from being used for agricultural purposes. If the scheme were to proceed as proposed, this would cause the loss of highly productive food producing agricultural land. In addition to the land directly underneath the pylons, which would be rendered impossible to farm, the location of a pylon within a field will cause disruption to agricultural operations in the vicinity of the pylon, reducing efficiency and/or rendering additional areas as unproductive. | N | Impacts from the Inter-Array Connections and Grid Connection Route have been considered within Section 5.8 of **ES Chapter 5**: Agriculture and Soils (Doc Ref. 6.1).<br><br>A detailed soil survey of the Inter-Array Connections and the Grid Connection Route is proposed post-DCO consent once detailed design has been undertaken, and therefore the footprints of infrastructure which could impact soils is known, as set out within the **OSMP** (Doc Ref. 7.14).<br><br>The **OSMP** (Doc Ref. 7.14) applies to all parts of the Scheme, including the Solar Development Areas, Inter-Array Connections and the Grid Connection Route. |
| Lincolnshire County Council | **Chapter 9: Agriculture and Soils**<br><br>The Inspectorate in their Scoping Opinion required that the potential effects on drainage capabilities and soils should be assessed. The response to this is '*The potential effects of the Scheme on soil resources are now being fully considered and a preliminary assessment has been provided within section 9.8 of this chapter*.' Section 9.8 however only appears to consider the impact on soils, and the Council would request that the impact on agriculture is also included. The land within the area crossed by the route is reliant on drainage by underground pipes. The location of pylons on this land significantly complicates the potential for future re-draining of the land, by adding a physical obstruction through which it would not be possible to lay a new drainage pipe. This is likely to have an adverse impact on the productivity of the land in question, which cannot be productively farmed without the benefit of good drainage. The ES should therefore consider this impact. | N | Impacts on land drainage are considered within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1).<br><br>An assessment of impacts on agricultural land use is provided in Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1). The land-take associated with each pylon base is small in relation to the overall field areas, and the pylons are typically spaced every 350m. As a result, the presence of a pylon base is unlikely to materially constrain the ability to install, maintain, or realign subsurface drainage infrastructure within the wider field.<br><br>In addition, the **OCEMP** (Doc Ref. 7.10) sets out a series of measures to ensure existing field drainage functionality is maintained during and after construction. These include: |

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| | Confirmation would also be required to ensure that on decommissioning the pylons and substructures would be removed and the land returned to the equivalent grade of land which existed prior to the project. | | • Ensuring existing field drainage systems are not compromised as a result of construction, with drainage maintained during the works and reinstated, so far as reasonably practicable, to a condition that is as effective as before;<br>• Undertaking drainage surveys to establish existing drainage patterns, identifying and marking any drains encountered, and recording the location, condition, characteristics (e.g. depth, pipe type and diameter) of any drains cut or disturbed; and<br>• Reinstating or diverting any affected field drainage where reasonably practicable, with landowners and occupiers informed about the design and timing of drainage works, including any changes to pipe layout, falls, dimensions and outfalls.<br>With these measures in place, no significant adverse long-term effects on land drainage capacity or agricultural productivity are anticipated.<br>As set out within **ES Chapter 2: The Scheme** (Doc Ref. 6.1), all above-ground physical infrastructure would be dismantled and removed from the Solar Development Area, Inter-Array Connections and Grid Connection Route. This would include the removal of all PV panels, mounting poles, solar stations, substations, BESS, 400kV overhead line and pylons, cable sealing end compounds (CSEC), 132kV overhead line and poles. In addition, concrete foundations to these elements would be removed to a depth agreed with the relevant landowner and recycled or disposed of in accordance with good practice and market conditions at that time.<br>The **OSMP** (Doc Ref. 7.14), submitted with the DCO Application, sets out that decommissioning will aim to restore all agricultural land without any degradation of the current ALC grade. Any minor variability from the current ALC grading identified in any post restoration surveys would be acknowledged and an assessment made but may be an artefact of the point-by-point auger sampling. At decommissioning, the methodology using field-averaging by soil type would be the more appropriate. |
| Lincolnshire County Council | **Chapter 9: Agriculture and Soils** | N | An updated cumulative effects assessment for agriculture and soils is provided within Section 5.11 of **ES Chapter 5: Agriculture** |

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| | Regarding cumulative effects on agriculture, paragraph 9.11.1 states that *'All solar projects on agricultural land will be temporary and decommissioned, with no likely significant effect with regards to the permanent loss of agricultural land extent, degradation of quality or loss of soil resource.'* Therefore, the residual effect of each of the developments on the agricultural land and soil resource is predicted to be not significant, as for the Scheme.' It is suggested that this statement is revisited as other solar schemes within Lincolnshire have reported a permanent loss of agricultural land which totals significantly in excess of 20ha. Paragraph 9.11.1 goes on to state that 'The cumulative effect of solar schemes within Lincolnshire is also assessed to be not significant, considering the vast arable landscape that these developments sit within.' According to the Institute of Environmental Management & Assessment (IEMA) Guide 'A New Perspective on Land and Soil in Environmental Impact Assessment' (February 2022) as referenced as guidance in paragraph 9.2.24 states that 'the permanent loss, or reduction in quality, of more than 20ha of agricultural land due to development is of very high magnitude', which is acknowledged as 'major' in Table 9-6.<br><br>The further statement at paragraph 9.11.1 asserts that *'It is also noted that the Scheme would not result in any permanent loss of BMV agricultural land to 'hard development' (which includes permanent sealing of the land and excludes any woodland planting), and therefore, would not contribute to any cumulative permanent loss of BMV land.'* The Council is of the opinion that it is irrelevant how the BMV land is permanently lost. Identification of amount of BMV land which is permanently sealed and land which would be potentially lost to landscaping/BNG is requested to be included in the ES. Paragraph 9.8.33 acknowledges that 'Some areas of habitat, if implemented, may remain, but in these areas the land quality would not have been altered, so this is considered a neutral impact' This may be a neutral effect on soils, but this does not acknowledge the impact of the loss of BMV to agriculture from this scheme. It is expected that the cumulative impact on both soils and agriculture across Lincolnshire is considered as part of the ES. | | **and Soils** (Doc Ref. 6.1). The assessment considers both temporary and permanent land take from the Scheme and cumulative solar projects within Lincolnshire, including from habitat management areas.<br><br>On the basis of the total cumulative land-take calculated within Table 5-17 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1), it is estimated that cumulative solar schemes in Lincolnshire will account for approximately 3% of all agricultural land within Lincolnshire. An estimated 1.1 % of BMV land would be temporarily used and 0.02 % of BMV land permanently used. Whilst there is a measure of uncertainty around this proportion, it is indicative that the solar schemes represent a small proportion of agricultural and BMV land in the County. Whilst there is an additive effect of multiple cumulative schemes, the regional distribution and relative area of land use change means that the cumulative effects (impact of geographical scaling) from the use of agricultural land and BMV land are assessed as not significant. |
| Lincolnshire County Council | **Chapter 9: Agriculture and Soils**<br><br>Land drainage is a key factor in assessing both land classification and the impact on land restoration particularly along any cable or grid connection route, where trenches are dug, or where soils are stripped even temporarily. Other detailed issues for farmers and landowners include land drainage, weed burden, biosecurity for diseases, timeliness of soil stripping, compaction of subsoil and re-instatement to previous quality/standard should be addressed in the ES and through negotiations with landowner representatives such as the National Farmers Union Country Land and Business Association and Central Association of Agricultural Valuers.<br><br>It is recommended that an agricultural officer or soils professional would need to work with the farmers and landowners affected by the grid route and at decommissioning, to ensure reinstatement is satisfactory. It is welcomed at paragraphs 9.7.2, 9.7.3 and 9.7.4 that:<br><br>• An outline Landscape and Ecological Management Plan (oLEMP), outline Soil Management Plan (oSMP), and outline CEMP will be produced for the application to establish the overarching management and monitoring measures in relation including provisions to ensure that soils | N | The Applicant acknowledges the importance of land drainage, soil protection, biosecurity, and the need for effective engagement with affected farmers and landowners throughout the construction, operation, and decommissioning of the Scheme.<br><br>Impacts on land drainage are considered within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1).<br><br>The following documents have been submitted as part of the DCO Application: **Outline LEMP** (Doc Ref. 7.16), **Outline CEMP** (Doc Ref. 7.10), **Outline OEMP** (Doc Ref. 7.11), **Outline DEMP** (Doc Ref. 7.12) and **Outline SMP** (Doc Ref. 7.14). Collectively, these documents secure a range of commitments that specifically respond to Lincolnshire County Council's comments regarding |

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| | within the Site would be monitored for signs of compaction, waterlogging and vegetation death. Remedial action would be taken where practical where this is identified (paragraph 9.7.2).<br>• An outline Operational Environmental Management Plan (oOEMP) and outline Decommissioning Environmental Management Plan (oDEMP) would ensure similar provisions are applied during the operational and decommissioning phases (paragraph 9.7.3)<br>• Outline SMPs would also be developed for the Inter-Array Areas and Grid Connection Corridor (paragraph 9.7.4). | | drainage, soil handling, land restoration, weed control and biosecurity.<br>The **OSMP** (Doc Ref. 7.14) secures the requirement for a Specialist Technical Advisor, who will undertake pre-construction soil surveys, supervise the implementation of soil-related mitigation, and provide on field testing and assessment of soil conditions. |
| Lincolnshire County Council | **Chapter 9: Agriculture and Soils**<br>Please note that paragraph 9.8.19 claims there is no trafficking on soils during the operational phase, but it clearly states in paragraph 9.8.18 that '*Where necessary to access the PV Area to repair or replace components or complete routine maintenance, this would so far as possible be programmed to times of the year when soils are dry and resilient to the light traffic involved'* would be required. Although this is not construction traffic, it does render 9.8.19 essentially incorrect. | N | The Applicant notes this comment. During operation, Inter-Array and the Grid Connection Route corridors will only be subject to routine inspection and reactive maintenance, as described within **ES Chapter 2: The Scheme** (Doc Ref. 6.1). This would require small-scale and localised works and therefore limited access and light trafficking during construction. The inconsistency identified in the PEIR has therefore been addressed in the DCO Application. With the adoption of work plans and method statements, requiring industry standard good practice, as secured through the **OOEMP** (Doc Ref. 7.11) and **OSMP** (Doc Ref. 7.14), the structure, function and quality of soil resources will be maintained. |
| Lincolnshire County Council | **Chapter 10: Landscape and Visual**<br>**Main overarching comments on the PEIR**<br>The proposed development is subject to EIA, and a Scoping Report was issued by the developer: Meridian Solar Farm Scoping Report [19/01/24], prepared by [Temple Group Ltd], which identified the need for a section on Landscape and Visual. Subsequently, a Scoping Report Review was carried out by the Council (13/06/24) and a Scoping opinion was received from the Planning Inspectorate and other stakeholders (10/07/2024). Overall, the landscape and visual elements of the PEIR and subsequent scope of the LVIA chapter is generally aligned with the scoping report and scoping report review, as well as other AAH comments (AAH TM01: Landscape and Scoping Opinion, TM02: Initial Viewpoint Comments), and meetings/workshops held with the applicant. | N | The Applicant notes this comment. |
| Lincolnshire County Council | **Chapter 10: Landscape and Visual**<br>**Main overarching comments on the PEIR**<br>As outlined within Chapter 10: Landscape and Visual of the PEIR, the development proposals are preliminary and continue to be developed as part of an iterative process. This includes the design, layout, siting and heights of the PV modules, BESS units, substations, inter-array connections and the grid connection. Consequently, viewpoint locations and photomontages covering these elements remain subject to change or have not been fully agreed. Specifically, there are no viewpoint locations agreed that cover the proposed grid connection which it is anticipated would consist of overhead lines | N | The Applicant can confirm that **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) has assessed the reasonable worst case scenario in terms of maximum parameters associated with the PV modules, BESS units, substations, inter-array connections and the grid connection.<br>The LVIA viewpoints and split of photomontages and reference viewpoints were discussed and agreed with SHDC and LCC, as summarised within Table 12-3 of **ES Chapter 12: Landscape and** |

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| | and pylons with a guidance height of up to 50m. The development of overhead lines and pylons through this landscape is of particular concern, and we strongly recommend the applicant determine these likely effects and consult with the Council and other interested parties as soon as possible. Additionally, only indicative locations of the proposed BESS and sub-stations (5 No.) have been provided on Figure 2-1 with precise siting and design details remaining unresolved. These elements have a guidance height of 17-17.5m and are likely to have a significant effect on both views from receptors and the landscape. | | **Visual** (Doc Ref. 6.1). These were based with reference to the final locations and siting of the Scheme infrastructure, which are set out within **ES Chapter 2: The Scheme** (Doc Ref. 6.1) and secured within the **Design Parameters** (Doc. Ref. 7.4) and **Works Plans** (Doc Ref. 2.3). |
| Lincolnshire County Council | **Main overarching comments on the PEIR**<br>Vegetation retention and mitigation proposals (shown on Figure 10-16) also remain subject to change until the design proposals have been finalised and it is uncertain that the on-site and off-site planting indicated can be fully implemented. Specifically, there is more detailed work to do to ensure that all indicated on-site tree planting would be compatible with proposed built structures, including the PV units, and with the existing landscape character (see PEIR P10 Gedney Hill Parish Council comments Table 10-2) which is sensitive to over planting (with for example, woodland blocks) in some locations.<br>There is also more work required to ensure the delivery of off-site planting, especially that requiring voluntary agreement (paragraph 10.9.3). A commitment to enhancement is also described in paragraph 10.9.5 including wetland planting, additional PROW links and information boards. This will also require further consultation and design work to ensure delivery. These proposals must all be well coordinated with the LEMP (paragraph 10.9.4) and an integral part of the development proposals. | N | The **OLEMP** (Doc Ref. 7.16) presents the proposed landscape management strategy for the Scheme. It focusses on the retention of existing vegetation, where practical, and the provision of tree and shrub planting on the field boundaries of the Solar Development Area. Landscape corridors have been maintained through the Site to allow permeability for wildlife. The draft landscape strategy was discussed with LCC and SHDC, as summarised within Table 12-3 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |
| Lincolnshire County Council | **Main overarching comments on the PEIR**<br>While it is accepted that a number of designs aspects of the scheme cannot be confirmed at this stage, we will expect that the final LVIA / ES to clearly set out the maximum parameters of the development, such as heights and locations of elements in more detail than that provided in the PEIR (paragraph 10.4.91). This is particularly important for larger and taller elements such as the substations, BESS, inter-array connections and the overhead grid connection lines and pylons. The PEIR uses a 'worst case' scenario to assess likely significant effects through the use of the Rochdale Envelope approach (paragraph 10.4.91) to help ensure effects are not underplayed. At this stage, it is agreed this is a reasonable approach, but there remains some degree of uncertainty about the landscape and visual outcomes and further consultation with the Council and other stakeholders will be required before agreement on significant affects can be agreed. | N | All elements of the design have been assessed on the basis of the maximum parameters set out within **ES Chapter 2: The Scheme** (Doc Ref. 6.1) and secured within the **Design Parameters** (Doc. Ref. 7.24) and **Works Plans** (Doc. Ref. 2.3). |
| Lincolnshire County Council | **Main overarching comments on the PEIR**<br>It is requested that further landscape and visual consultation is carried out between AAH/the Council and District Authority landscape specialists (inc. South Holland District Council) and the developer team (Downing Renewable Developments) following the conclusion of this formal consultation process. This would likely cover the PEIR comments as well as development proposals and mitigation scheme, including Inter-array and grid connection routes and location of any larger structures or | N | Meetings undertaken with LCC and SHDC landscape advisers are summarised within Table 12-3 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |

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| | buildings such as sub-stations, extent of vegetation loss and mitigation, and also subsequent knock-on effects such as any requirement for additional / amended viewpoints or visualisations. | | |
| Lincolnshire County Council | **Main overarching comments on the PEIR**<br>Finally, it is acknowledged that the viewpoints shown in Figure 10-13 have been amended and adjusted in response to TM02: Initial Viewpoint Comments. A new viewpoint has been taken from the A16 and adjustments to previous viewpoint locations to include more PRoW and other potentially sensitive receptors has also occurred. A review of Figure 10-15: Winter Viewpoint Photography shows that nearly all of these viewpoints will capture potential BESS or inter-array locations (VP 21 being the only exception). However, it is anticipated that as precise locations of the BESS, substations and inter array connections become known, further adjustments to these viewpoints including their field of vision or location may be required. Additionally, more viewpoints will be required to cover the Grid Connection corridor which is not yet finalised, and this element is a particular concern in landscape and visual terms. | N | The LVIA viewpoints and split of photomontages and reference viewpoints were discussed and agreed with SHDC and LCC, as summarised within Table 12-3 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). These were based with reference to the final locations and siting of the Scheme infrastructure, which are set out within **ES Chapter 2: The Scheme** (Doc Ref. 6.1) and secured within the **Design Parameters** (Doc. Ref. 7.4) and **Works Plans** (Doc Ref. 2.3). |
| Lincolnshire County Council | **Detailed comments on PEIR:**<br>In regards to the landscape and visual chapter (Chapter 10 of the PEIR):<br>**10-1 Introduction**<br>The introduction states clearly that this is a preliminary assessment of likely significant effects and that a more detailed assessment will be provided within the full LVIA provided as part of the ES.<br>Agreement that the 'Landscape Fabric' should be considered along with Character, Designations and Visual Amenity. However, there is no plan within the PEIR showing extent of vegetation / boundary / tree removal. This will be required to fully understand the impact of the proposals on the existing landscape and we encourage the applicant to retain and protect existing vegetation where possible, keeping removal to a minimum. This must consider both on site and wider vegetation removal, such as to facilitate transport access for larger vehicles on the wider network. | N | Vegetation removals have been mapped out within **ES Appendix 12-8: Arboricultural Impact Assessment** (Doc Ref. 6.3) and **Hedgerow Regulations and Tree Preservation Orders Plans** (Doc Ref. 2.12).<br>Existing vegetation has been retained, wherever practical, as set out within the **OLEMP** (Doc Ref. 7.16). |
| Lincolnshire County Council | **Detailed comments on PEIR:**<br>**10-2 Legislation, Policy and Guidance**<br>A comprehensive list of legislation, policy and guidance is provided; however, we recommend the applicant review any potential Parish Council Neighbourhood Plans of relevance to the Application. | N | **ES Appendix 12-1: Landscape and Visual Legislation, Policy and Guidance** (Doc Ref. 6.3) provides a comprehensive list of relevant legislation, policy and guidance and how this has been addressed in the ES. Relevant local policy and guidance is set out in Section 6 of **ES Appendix 12-1: Landscape and Visual Legislation, Policy and Guidance** (Doc Ref. 6.3). There are no neighbourhood plans of relevance to the Site. |
| Lincolnshire County Council | **Detailed comments on PEIR:**<br>**10-3 Scoping opinion and additional engagement**<br>No aspects of landscape and visual have been scoped out for the construction, operational and decommissioning phases of the development. As the scheme design evolves, detailed elements will become more refined. The PEIR is based on maximum parameters to provide a worse case preliminary | N | The Applicant notes this comment. |

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| | assessment. It is anticipated that the number and extent of likely significant effects will reduce. It is agreed that this is a reasonable approach at this stage.<br><br>The scoping consultation raised concerns about the impact of lighting, extent and parameters of the ZTVs, impact on road users, need for 'winter views and 'worst case' scenarios, location of viewpoints, retention of existing vegetation, assessment of cumulative effects and mitigation planting (PEIR Table 10-2). Addressing these concerns remains a priority and an ongoing process with more information required in the LVIA, LEMP and ES. | | |
| Lincolnshire County Council | **Detailed comments on PEIR:**<br><br>**10-4 Assessment and methodology**<br><br>Changes to the 15km study area associated with the BESS and on-site substation compounds and grid connection corridor have been made since scoping due to developments to the scheme design (paragraph 10.4.6). No information is provided regarding these developments within the PEIR and an explanation may be beneficial if it helps to demonstrate a thorough approach.<br><br>In some instances, 'professional judgement' will mean that it is 'sufficient to describe only sensitivity' (paragraph 10.4.28) and a 'detailed justification will not be provided' (paragraph 10.4.74). We agree that for brevity it may be prudent to reduce the process in some instances but care will be needed to ensure a thorough approach.<br><br>The approach to viewpoints is to organise them according to distance from the Site boundary – 0-5km detailed assessment, 5-10km grouped assessment, and 10-15km summary assessment. In some instances, for example, when assessing the grid connection (50m height) it may be appropriate to provide detailed assessment for distances greater than 5km if the receptors have a high sensitivity and the development features are larger and can be seen from greater distance.<br><br>It is noted that 'below ground infrastructure would be left in-situ (paragraph 10.4.81) – see below comments on 'temporary' description of the development (paragraph 13-14). | N | A study area of 10km has been defined around the Grid Connection Route, which includes the tallest elements of the Scheme's infrastructure. A study area of 5km has been defined around the Solar Development Areas and Inter-Array Connections. It is considered that beyond these distances, no significant effects are likely to occur. This was also demonstrated by the preliminary assessments completed within the PEIR. Further information on the study areas and assessment methodology is provided within **ES Appendix 12-2: LVIA Methodology** (Doc Ref. 6.3) and Section 12.4 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1).<br><br>**ES Chapter 2: The Scheme** (Doc Ref. 6.1) clarifies that below ground infrastructure, such as concrete foundations, would be removed to a depth agreed with the relevant landowner from the area within the Order Limits and recycled or disposed of in accordance with good practice and market conditions at that time.<br><br>The mode of any underground cable decommissioning would be dependent upon Government policy, best practice and landowner agreement at that time. If required, 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 up the entire length of the cable route. |
| Lincolnshire County Council | **Detailed comments on PEIR:**<br><br>**10-6 Baseline Conditions (inc. Future Baseline)**<br><br>PROW and recreational routes are mapped on Figure 10.3. At present, only two long distance routes are identified in the PEIR - McMillian Way and NCN Route 12. We judge that there may be more named routes with potential views of the development, particularly when considering pylons and overhead lines. These could be added, and those already identified, to Figure 10.3. | N | PROW and recreational routes have been mapped on **ES Figure 12-3: PROW** (Doc Ref. 6.2) and have also been included on **ES Figure 12-19: Viewpoint Locations on OS Mapping** (Doc Ref. 6.2) for context. Detailed information on PROW and recreational routes represented by viewpoints has also been included in **ES Appendix 12-5: Visual Baseline** (Doc Ref. 6.3).<br><br>Cumulative developments within the study area of the Scheme have been considered, including other energy infrastructure |

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| | The Future Baseline (paragraph 10.6.64) describes the expansion of nearby settlements due to housing development and holiday lodges. There is no mention of the impact of renewable energy projects in the county, which are extensive (both recently approved and, in the system,) despite these being listed in table 10-14. These schemes must be considered as part of the LVIA, and how this landscape, typified by agriculture, will have large scale energy infrastructure (solar, BESS and new pylons) as a defining landscape feature. | | developments, as set out within **ES Appendix 12-7: LVIA Cumulative Effects** (Doc Ref. 6.3) and Section 12.11 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |
| Lincolnshire County Council | **Detailed comments on PEIR:**<br>**10-8 Preliminary Assessment of Likely Significant Effects**<br>The development is categorised 'long term' as it is beyond 10 years. The development proposed is 40 years which is four times this length of time. Having reviewed the sections relating to this in GLVIA3, there is some strength to the consideration that this amounts to a permanent project, spanning multiple generations, and should not be described as 'long term'.<br>The development is also categorised as 'temporary' despite permanent remaining elements of the scheme including 'underground elements and planting' (paragraph 10.8.3). The development would have ongoing effects on the landscape after decommissioning if underground structures remain which could impact on future use. We believe the development should not be described as 'temporary' unless there is a commitment by the developer to remove underground elements.<br>It is noted that the 5 to 10km receptors have a low-moderate confidence rating due to the current level of information within the PEIR design. This is considered reasonable at this stage but more ongoing certainty will be needed in future phases of the planning process.<br>Mitigation has been considered in line with opportunities set out within existing Landscape Character studies including the Statements of Environment Opportunity (SEO) – (paragraph 10.8.4). It would be good if these were listed and the proposed design response to them tabled. It may also be worth clarifying if the SEOs relate to National Character Areas (NCA) or Local Character Areas (LCA). | N | The **Draft DCO** (Doc Ref. 3.1) includes a requirement for the decommissioning of the Scheme following its 40 year operational life. As such, the Scheme is not proposed to be permanent, and its decommissioning is a requirement of the **Draft DCO** (Doc Ref. 3.1).<br>As described within **ES Chapter 2: The Scheme** (Doc Ref. 6.1), at decommissioning, ES has assessed physical infrastructure to be removed from the area within the Order limits and recycled or disposed of in accordance with good practice and market conditions at that time. The mode of any underground cable decommissioning will be dependent upon Government policy, best practice and landowner agreement at that time, but the ES has assessed their removal as the worst case in respect of environmental effects. Areas of habitat and biodiversity mitigation and enhancement, as well as permissive paths delivered as part of the Scheme would remain up until the land is returned to the previous landowners. Following this, the landowners would choose how the land is to be used and managed. It is not considered any of these decommissioning features would justify categorising the Scheme as "permanent".<br>The terms 'long-term' and 'temporary' have been clearly defined within the LVIA.<br>Landscape character studies have been considered in the landscape baseline assessment, as set out within **ES Appendix 12-3: Landscape Baseline** (Doc Ref. 6.3). The landscape character of the Site has also been considered in the development of the **OLEMP** (Doc Ref. 7.16). |
| Lincolnshire County Council | **Detailed comments on PEIR:**<br>**10-9 Additional Mitigation and Enhancement Measures** | N | The **OLEMP** (Doc Ref. 7.16) outlines the proposed landscape strategy for the Scheme. The draft strategy was also discussed with SHDC and LCC, as summarised within Table 12-3 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |

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| | Many of the listed mitigation proposals are caveated with 'where appropriate' (paragraph 10.9.4) and therefore require further consultation and agreement with the relevant stakeholders including the Council.<br><br>The visual containment of the A16 is subject to 'voluntary agreement for planting outside the current scheme'. Further assurances of the deliverability of this proposal will be required and this mitigation will need to be secured as part of the DCO and clearly identified. If this cannot be secured, they cannot form mitigation proposals as part of the LVIA.<br><br>Areas within the site 'which have no proposed infrastructure' and 'could be used for landscape and visual mitigation planting' will need to be identified and quantified so their value can be assessed - perhaps as a percentage of the whole proposed development area. 'The larger areas' contributing to BNG should be identified and their links with the surrounding landscape clarified.<br><br>It is agreed that species selection should be native and agreed with the Council and SHDC.<br><br>It is agreed that a LEMP should be submitted as part of the DCO application and should set out the purpose of proposed planting, composition and method of establishment. This should provide detailed maintenance operations, and cover, as a minimum, 5 years to ensure planting is properly maintained up to the period assessed for residual effects. It may, however, be appropriate that this is reviewed, updated and carried out for the life of the development to ensure planting is consistently mitigating landscape and ecological effects. Plant replacements should also be considered, and it is likely these would be required for beyond the typical 5-year period to insure against an extensive die back or instance where failure to establish as predicted occurs prior to the 15-year period. | | Landscape screening has only been proposed within the Order Limits to ensure the deliverability of the mitigation. The proposed landscape strategy is described within the **OLEMP** (Doc Ref. 7.16) and illustrated on **Figure 1 Outline Landscape Masterplan** of the **OLEMP** (Doc Ref. 7.16).<br><br>The **OLEMP** (Doc Ref. 7.16) defines Habitat Management Areas and their purpose. These areas have also been included within the **Works Plans** (Doc Ref. 2.3) and have been accounted for within the **Biodiversity Net Gain Report** (Doc Ref. 7.9).<br><br>Native species have been proposed to form the planting mix for the Scheme, as set out within the **OLEMP** (Doc Ref. 7.16).<br><br>The requirements for monitoring and management prescriptions of landscape planting during the operational phase are also set out within the **OLEMP** (Doc Ref. 7.16). This includes measures for long-term management of planting up until the decommissioning of the Scheme. The **OLEMP** (Doc Ref. 7.16) also includes a minimum five-year establishment period for planting, during which plant replacement will be undertaken where necessary to ensure successful establishment of the mitigation planting. |
| Lincolnshire County Council | **Detailed comments on PEIR:**<br><br>**10-11 Cumulative Effects**<br><br>A map showing the red line boundaries and location of the applications described within table 10-14 would be very useful in helping to understand the cumulative effects of development within the development area. The landscape and visual environment around the development has the potential for very significant change through the establishment of multiple NSIP scale solar and energy projects replacing formerly agricultural land and a graphic demonstrating this clearly should be provided in the LVIA / ES. | N | Cumulative schemes short-listed for further assessment are shown on **ES Figures 4-1 and 4-2** (Doc Ref. 6.2). |
| Lincolnshire County Council | **Detailed comments on PEIR:**<br><br>**10-12 Conclusion and Next Steps**<br><br>Para 10.12.3 mentions the permanent change to the landscape created by the mitigation planting but fails to mention the permanent change created by the retention of below ground structures, and that 40 years spans several generations and would in our opinion be classed as a permanent development. It is anticipated that without the removal of below ground structures; the land could potentially not return to the agricultural use presently on site. We would suggest the applicant clarifies this point in the ES. | N | As described within **ES Chapter 2: The Scheme** (Doc Ref. 6.1), at decommissioning, ES has assessed physical infrastructure to be removed from the area within the Order Limits and recycled or disposed of in accordance with good practice and market conditions at that time. The mode of any underground cable decommissioning will be dependent upon Government policy, best practice, and landowner agreement at that time, but the ES has assessed their removal as the worst-case in respect of environmental effects. Areas of habitat and biodiversity |

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| | | | mitigation and enhancement, as well as permissive paths delivered as part of the Scheme would remain up until the land is returned to the previous landowners. Following this, the landowners would choose how the land is to be used and managed. It is not considered any of these decommissioning features would justify categorising the Scheme as "permanent".<br><br>Agricultural use of the land will be able to continue following decommissioning. |
| Lincolnshire County Council | **Detailed comments on PEIR Supporting Figures (Chapter 10)**<br><br>**Table 10-16 Illustrative Landscape and Visual Mitigation plan**<br><br>This plan is 'illustrative' and further detail on the proposed planting plan will be required to show more accurately the mitigation planting that will be possible. We would expect the DCO have a clear requirement that covers a detailed planting scheme and appropriate management linking to the LEMP.<br><br>Presently, there are unresolved questions around the compatibility of proposed trees adjacent to PV areas and how much undeveloped land would be available for planting. It is also unclear whether off site planting can be protected by agreement or new planting (along the A16) can be implemented as this will also require agreement. It is also unclear what existing planting would require removal to provide access to the site or to accommodate the development. A plan showing this information will be essential. | N | The **OLEMP** (Doc Ref. 7.16) presents the proposed landscape management strategy for the Scheme. It focusses on the retention of existing vegetation, where practical, and the provision of tree and shrub planting on the field boundaries of the Solar Development Area. Landscape corridors have been maintained through the Site to allow permeability for wildlife. The draft landscape strategy was discussed with LCC and SHDC, as summarised within Table 12 3 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |
| Lincolnshire County Council | **Chapter 12: Socio Economic and Land Use**<br><br>The Energy Infrastructure Position Statement 2023 agreed by the Council's Executive states that:-<br><br>a) New Grid infrastructure should be predicated on underground first, or on existing routes.<br><br>b) LCC objects to any proposals on ALC Grade 1,2 and 3a (BMV) land.<br><br>c) The potential exists to negotiate community benefits should a Development Consent Order be granted. This response, in line with the Position agreed by the County Council Executive, gives an indication of the community benefit to be sought from NSIP developments that utilise Best and Most Versatile (BMV) agricultural land. | N | The Applicant notes Lincolnshire County Council's reference to its Energy Infrastructure Position Statement (2023). While the Council's preference for undergrounding new grid infrastructure is acknowledged, the Applicant considers that the proposed overhead line (OHL) solution is consistent with, and supported by, the relevant National Policy Statements (NPS EN-1 and EN-5), which recognise that overhead lines will often represent the most appropriate, proportionate and environmentally acceptable option for grid connections, particularly where landscape, technical feasibility, and cost considerations are taken into account.<br><br>With respect to agricultural land, the Applicant recognises the Council's stated objection in principle to the use of Agricultural Land Classification (ALC) Grades 1, 2 and 3a (Best and Most Versatile). The siting and design of the Scheme infrastructure have avoided BMV land wherever practicable, and where BMV land is unavoidably required for elements of the Scheme, this has been clearly assessed within the ES and weighed as part of the |

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| | | | overall planning balance presented in the **Planning Statement (Doc. Ref. 7.1)**. Temporary and reversible land take has been maximised, and long-term physical loss of BMV land has been minimised as far as feasible.<br><br>Regarding community benefits, the Applicant is committed to establishing a Community Benefit Fund associated with the Scheme. This fund will be made available to support important causes, services, and facilities in the local area. Engagement undertaken to date as part of the Scheme's consultation has sought feedback from local communities on potential priorities, and the Applicant will continue to work with local stakeholders to determine the most effective way to distribute funding should the Scheme be consented. |
| Lincolnshire County Council | **Recreation and Tourism**<br><br>The assertion at paragraph 12.6.34 that 'tourism in South Holland is significantly smaller in absolute terms compared to the broader Greater Lincolnshire LEP' is misleading. The total economic impact for South Holland is over 10.7% of the Greater Lincolnshire total and one would expect 11.1% (one ninth) on the basis South Holland is one of nine districts in Greater Lincolnshire. On the other metrics in table 12-15, South Holland is again close to 11%. One would expect Lincoln with its historic sites and East Lindsey with its larger coastline and AONB to contribute the most to these metrics. Tourism in South Holland is significant and is meaningful and should be noted as such throughout this chapter.<br><br>The location of the grid connection corridor so close to Baytree Owl and Wildlife Centre, Hunter's Lodge Caravan Site and Fun Farm Soft Play Centre is a concern. Despite the applicant's assertion (at paragraph 12.8.43) that the site in operation will not deter tourism, these businesses are highly likely to be affected by 400kV overhead lines by virtue of visual impact and noise as well as (perceived) health and other risks for the business users. This could lead to financial impacts for the businesses, reduced economic output and potential job losses. It is incorrect to state (as at paragraph 12.8.44) that there is a lack of nearby tourist attractions when there are some tourist businesses nearby.<br><br>It is incorrect to state (as at 12.8.44) that tourism is low sensitivity in South Holland because: it is a policy priority (as per policy strategic priority 4 of the Local Plan); and changes to the sector (albeit potentially small) could be material to some businesses. | N | The sensitivity of the tourism industry in South Holland has been reviewed **in ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1), considering local policies, including the South East Lincolnshire Local Plan, when judging the sensitivity.<br><br>The likelihood of significant visual, noise and health impacts on these tourist businesses (Baytree Owl and Wildlife Centre, Hunter's Lodge Caravan Site and Fun Farm Soft Play Centre) is covered in the relevant technical chapters of the ES. Refer to: Section 14.8 of **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1), **ES Chapter 6: Air Quality** (Doc Ref. 6.1), **ES Chapter 10: Human Health** (Doc Ref. 6.1), **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1), and **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1)<br><br>**ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1) considers direct land-take effects and indirect severance effects of the Scheme on local businesses and visitor attractions.<br><br>Overall, no significant effects on the operation of these businesses are considered likely to occur. |
| Lincolnshire County Council | **Proximity of Settlements**<br><br>The location of the grid connection corridor so close to Spalding, Weston, Moulton and Cowbit is a concern, and includes proximity to the newly completed and/or largely built out allocated housing sites WSN003, WSN029 and reserve site WSN036. These residential and proposed residential locations are highly likely to be severely affected by 400kV overhead lines by virtue of visual impact and potentially noise as well as (perceived) health and other risks for residents. The proposed development would | N | The likelihood of significant visual, noise, and health impacts are discussed in the relevant technical chapters of the ES. Refer to: Section 14.8 of **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1), **ES Chapter 6: Air Quality** (Doc Ref. 6.1), **ES Chapter 10: Human Health** (Doc Ref. 6.1), **ES Chapter 12:** |

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| | impact upon residential amenity. The routing process (outlined at paragraph 12.8.45) must be carefully considered with potential impacts to amenity in mind with Policy 2 of the Local Plan in mind. | | **Landscape and Visual** (Doc Ref. 6.1), and **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1).<br><br>**ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1) considers direct land-take effects and indirect severance effects of the Scheme. The routing of the Grid Connection Route has been carefully considered with regards to potential amenity impacts, as further described within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1).<br><br>Overall, no significant effects on receptors within Spalding, Weston, Moulton, and Cowbit with respect to socio-economics, air quality, human health and noise and vibration are considered likely. However, moderate adverse (significant) visual effects may arise for visual receptor groups, where there are views into the Site. Effects are most likely to arise for receptors adjacent, or in close proximity, to the Scheme. Where receptors may be located further afield, significant effects may arise due to the openness of views toward the Scheme, changes to the full extent of the available view, or where the receptor may experience changes in views in multiple directions. |
| Lincolnshire County Council | **Temporary workforce**<br><br>The 495 FTE construction workers from outside South Holland would be travelling to or staying in temporary accommodation in South Holland. It is noted at paragraph 12.8.11 that trainees and apprentices would also be employed and this is not factored into the assessment; so, those travelling or in accommodation could be higher. The report ignores the potential negative socio-economic effects that could arise from this:<br><br>• Demographic changes and potentially community cohesion, which could be significant depending on workforce age, gender and location of temporary accommodation.<br><br>• Impact on local housing markets, including availability and affordability, particularly if the workforce is located within nearby smaller settlements.<br><br>• Social services and infrastructure, an obvious area for consideration is healthcare but perhaps education and other services, again, depending on age, gender and location of temporary accommodation.<br><br>• Public health and safety, depending on age, gender and location of temporary accommodation, with potential for anti-social behaviour.<br><br>There is no mention of the above considerations in paragraph 12.11 in relation to cumulative impacts with other nearby NSIPs that will also have a temporary construction workforce. | N | **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1) includes an assessment of potential effects of the temporary workforce on accommodation during the construction phase. Section 14.8 provides an assessment from the Scheme on its own, with cumulative effects with other developments assessed within Section 14.11. In conclusion, no significant effects are considered likely, considering the number of major hotels available within 60 minute drive time area and their typical occupancy rate at peak periods. It is not considered likely that the number of trainees and apprentices to be employed by the Scheme would materially change the conclusions of the assessment.<br><br>Potential effects on demographic changes and community cohesion associated with the temporary workforce is assessed within **ES Chapter 10: Human Health** (Doc Ref. 6.1). In conclusion, no significant effects are considered likely, given the estimated construction workforce numbers and the duration of the construction period. |

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| | Paragraph 12.6.50 states that '*there are no allocated mineral safeguarding areas within the Site or within 500m*'. Please note that the south west corner of PV Array area A1 encroaches into a Sand and Gravel Mineral Safeguarding Area (MSA) (identified in the current MWLP and emerging MWLP). | | Relevant effects assessed in **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1) include:<br>• Any potential impacts on local housing markets associated with the temporary workforce.<br>• Cumulative impacts with other nearby NSIPs that will also have a temporary construction workforce.<br>• Relevant effects assessed in **ES Chapter 10: Human Health** (Doc Ref. 6.1):<br>• Any effects on social services and infrastructure associated with the temporary workforce, including on local healthcare and education.<br>• Any potential effects on public health and safety associated with the temporary workforce.<br>It is noted within **ES Chapter 14: Socio-Economics and Land** Use (Doc Ref. 6.1) that the south west corner of PV Array area A1 encroaches into a Sand and Gravel Mineral Safeguarding Area. However, the Scheme is not considered likely to result in a significant effect on the sand and gravel Mineral Safeguarding Area (refer to **Appendix F: Minerals Safeguarding Assessment** of the **Planning Statement** (Doc Ref. 7.1) for further details). |
| Lincolnshire County Council | **Chapter 13: Traffic and Access**<br>The methodology used for the transport assessment is acceptable in terms of traffic generation and distribution. It is acknowledged that this is a preliminary report and the following comments are provided to assist in ensuring that the future Transport Assessment includes the required detail.<br>It is noted in paragraph 13.8 Baseline Conditions, that many of the access roads proposed are single track roads. The Transport Assessment which is to be prepared will need to show appropriate mitigation in the form of sufficient passing places such that the proposed vehicles can pass safely on these routes. This is acknowledged in paragraphs 13.8.8, 13.8.10 and 13.8.12 but no detailed proposals have yet been provided.<br>Currently, many of these routes have very low traffic flows and the construction traffic would add significant numbers of vehicles. For example, L9 Queens Bank and Martins Road has existing 2 vehicles in the peak hour, this is forecast to rise to 184 vehicles in peak construction period – a 9180% increase. Whilst the single track road is safe and acceptable for the existing low usage, it will require several passing places to be provided to enable 184 vehicles per hour to pass safely.<br>Details of numbers, locations, and schematic layouts of the proposed passing places on all single track roads will need to be provided in the Transport Assessment. | N | Construction traffic routing and the locations of Site accesses have been reviewed, with updated routeing and access locations shown on **ES Figures 15-3 and 15-4** (Doc Ref. 6.2).<br>Queens Bank is no longer proposed to be used by HGVs for the Scheme and therefore, will not require passing places. As set out within the **Outline CTMP** (Doc Ref. 7.13), the Applicant anticipates temporary passing places to be required on Martins Road (see **Streets, Rights of Way and Access Plans,** Section A, Sheets 5&6 (Doc Ref. 2.6)) and Langary Gate Road (see **Streets, Rights of Way and Access Plans**, Section A, Sheets 9-12 (Doc Ref. 2.6)). A detailed temporary passing place strategy is to be agreed with LCC. The Order Limits incorporate sufficient space for temporary passing places to be provided.<br>The Cumulative effects of nearby schemes including neighbouring NSIPs have been considered in **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) section 15.11. Details on the layouts, visibility splays and swept paths required for site |

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| | Cumulative Effects – More evidence will be required in the Transport Assessment that other NSIPs (especially Outer Dowsing Offshore Wind (ODOW) which has recently completed its examination) have been considered. ODOW adds significant traffic to main road network and it would be helpful if Table 13.24 is expanded to include an additional column of other committed developments.<br><br>Accesses will require layout drawings showing visibility splays, swept path details (as noted in paragraph 13.7.11). | | accesses are shown in Annex B of the **OCTMP** (Doc. Ref. 7.13). Details on local walking, cycling and equestrian facilities are outlined in section 15.6 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1). Local PRoW are also shown in **ES Figure 15-2** (Doc. Ref. 6.2). |
| Lincolnshire County Council | **Public Rights of Way**<br><br>Page 27 of the Stage 2 Consultation Information booklet states that tree planting at Parcel A could be used to break up the visual impact of the solar panels from this site. Firstly, they do not appear to have mapped Crowland Public Footpath 7 and Crowland Public Bridleway 17 on the map.<br><br>The Stage 2 Consultation Information booklet also mentions on a number of occasions the idea of tree planting to screen the site from PROW. In principle this is welcomed as a mitigation measure, however it will be important to ensure that any trees are planted further back from the boundary of the path; they should not be planted immediately on the boundary as they will grow over the PROW and cause a potential obstruction, and are more likely to cause issues with overhanging vegetation which the landowner will be responsible to cut back.<br><br>The PEIR does not appear to fully reflect the Council's advice provided in June 2024 (see below). It still does not list the walking opportunities provided by Crowland BW 17 and Crowland BW 11. Walking routes at Land Parcel D however are detailed.<br><br>Paragraph 13.8.16 states 'No formal on or off-road cycling network' however there is no mention of the bridleway network which can be utilised for cycling or the opportunities provided by the local bridleway network as recommended in the Council's advice of June 2024 below.<br><br>The advice and suggested changes provided below regarding equestrian facilities listed in the PEIR do not appear to have been included in the published PEIR. | N | Details on local PRoWs, cycleways and bridleways are outlined in section 15.6 of **ES Chapter 15: Traffic and Access (**Doc Ref. 6.1). Local PRoW are also shown in **ES Figure 15-2** (Doc. Ref. 6.2). These include Crowland Public Footpath 7 (Crow/7/1), Crowland Public Bridleway 17 (Crow/17/1) and Crowland Public Bridleway 11 (Crow/11/1 and Crow/11/2). Potential impacts on these PRoWs have been considered within Section 15.8 of **ES Chapter 15: Traffic and Access (**Doc Ref. 6.1). The **Outline Public Rights of Way Management Plan** (Doc Ref. 7.15) sets out management measures for PRoWs that intersect with the Order Limits.<br><br>An illustrative landscape masterplan is provided within Annex A of the **OLEMP** (Doc Ref. 7.16). This illustrates that boundary planting has been offset from the PRoWs. |
| Lincolnshire County Council | **Public Rights of Way**<br><br>The Council previously responded to this on the 10 June 2024 and made the following comments:<br><br>Existing Walking Facilities – The descriptions generally don't make sense and are a little confusing:<br>• Land Parcel A – Crowland BW 17 is missing from the walking facilities. It is unclear why nearby routes have been omitted when they are included for the other areas?<br>• Land Parcel B and C – Crowland BW 11 is missing from the walking facilities. Bridleways can also be used by pedestrians.<br>• Land Parcel D – There is a bridleway network on either side of the South Holland Main Drain which is not included. | N | Details on local PRoWs, cycleways and bridleways have been updated within the ES. See section 15.6 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) for details of walking, cycling and equestrian facilities in the vicinity of the Site. Local PRoW are also shown in **ES Figure 15-2** (Doc. Ref. 6.2). These include Crowland Public Footpath 7 (Crow/7/1), Crowland Public Bridleway 17 (Crow/17/1), Crowland Public Bridleway 11 (Crow/11/1 and Crow/11/2) and the Deepings cycle route. Potential impacts on these PRoWs have been considered within Section 15.8 of **ES Chapter 15: Traffic and Access (**Doc Ref. 6.1). The **Outline Public Rights of Way Management Plan** (Doc Ref. 7.15) sets out management measures for PRoWs that intersect with the Order Limits. |

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| | Existing Cycling Facilities – The report states '*No formal on or off-road cycling network'. No mention of the bridleway network!*<br><br>Existing Equestrian Facilities:<br>• Land Parcel A – The report described Deeping St Nicholas Public Bridleway No. 5. This route is a public footpath.<br>• Land Parcel B and C – The description for Crowland BW 11 is incorrect and misleading<br>• Land Parcel D – The details for the affected BWs appear to be correct.<br><br>*We further recommended the description of Crowland BW 11 to read as 'Crowland BW 11 commences at Queens Bank and runs along the northerly boundary of parcel C to Eaugate Road.* | | |
| Lincolnshire County Council | **Chapter 14: Other Environmental Topics**<br><br>**14.3 Human Health**<br><br>As with all solar farm proposals, renewable energy production is of long-term benefit to public health but not withstanding the Council's overarching objection to the loss of productive agricultural farmland. Growing healthy and nutritious food is of immediate benefit to public health. It appears that the developer has only left fields having Grade 1 soil free of solar array infrastructure so that it can continue to be farmed. Where lower grade fields (i.e., Grade 3 and below) are used for solar arrays, potential dual use as grazing pasture for appropriate animals should be considered or wildflower meadows and improved species' habitats created.<br><br>The Council welcomes the separate human health chapter in the final ES to bring all aspects of the development that impact on human physical and mental health in both a negative and positive way together in one place. The current PEIR largely achieves this.<br><br>It is accepted that there is likely to be minimal negative impact on human physical health during the operational phase. However, the impact on long-term human mental health and wellbeing has not been adequately addressed in the PEIR, to include the cumulative impact of this and other existing and proposed significant infrastructure projects in the area.<br><br>Mental health is mentioned in relation to the short-term construction activities, and there are references to stress and anxiety, but not the impact of living alongside this large scheme for many years. It is welcome that new woodland creation is proposed in the Landscape and Visual Assessment chapter of the PEIR, however, the impact that the loss of vistas across open fields can have on people's mental health should be considered. | N | Government policy does not specifically encourage dual use of land used for solar energy production to support food production. Currently solar farms occupy less than 0.1% of the UK's land. To meet the government's net zero target, the Climate Change Committee estimates that 0.6% of UK land will be required for solar farms (less than the amount currently occupied by golf courses). The UK Government Food Security Report, published in December 2021, also implies that solar farms do not in any way present a risk to the UK's food security; and solar farms contribute to address the biggest medium to long term risk to the UK's domestic food production: climate change.<br><br>While noting the above, the Application still recognises the potential for the land around the solar panels to remain in agricultural use for sheep grazing, although this will depend on local availability/expertise in doing so.<br><br>**ES Chapter 10: Human Health** (Doc Ref 6.1) assesses potential effects of the Scheme on the health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example, changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health. It is acknowledged that negative impacts on landscape and visual amenity have the potential to reduce resident's enjoyment of their environment, in particular their perception of tranquillity and rurality, impacting mental health. The ES assesses potential impacts on mental health and wellbeing across all project phases, |

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| | | | including operation. This includes consideration of the visual impacts outlined in **ES Chapter 12: Landscape and Visual** (Doc Ref 6.1). |
| Lincolnshire County Council | **Chapter 14: Other Environmental Topics**<br>**14.3 Human Health**<br>It is noted that Council officers have been unable to meet with the developers at scoping and would welcome the opportunity meet if the application for development consent progresses. However, the publicly available health data (i.e. Public Health England (PHE) Fingertips data tool) is sufficient on which to base impact assessments. However, the PEIR presents this at district, county, regional, and national level whereas ward level data, noting that the development spans five wards, should be used where it is available.<br>Locally, in Lincolnshire agricultural workers and armed forces personnel and veterans are also considered priority cohorts for inclusion health (access to healthcare services). Strategic health priorities for the local area are set out in the Joint Health and Wellbeing Strategy for Lincolnshire, with mental health, healthy weight, and physical activity being the priority themes of relevance to this development. The local Public Health team at the Council would also like the regional UK Health Security Agency (UKHSA) team and the Lincolnshire Rural Support Network (LRSN) to be consulted on the ES. South Holland District Council's Environmental Protection team should comment on matters such as noise and air quality.<br>The Council is not satisfied that it is "*assumed the potential effects of the Scheme in relation to electric and magnetic fields (EMF), through appropriate design, are not likely to be significant.*" (paragraph 14.3.40). Whilst it is accepted that the scheme would be constructed and operated in line with relevant stipulated safety guidelines, the Council wish to see the further assessment provided within the ES, including EMFs from 'overlapping' infrastructure and in relation to the grid connection. It needs to be demonstrated that potential actual exposure to radiation (which includes electromagnetic fields) will comply with exposure limits developed by the International Commission on Non–Ionizing Radiation Protection. Evidence on potential exposure to radiation must be considered. To minimise EMFs and landscape and visual impacts the Council would prefer to see an underground cable connection to the grid/substation. The cable corridors could then provide opportunities for linear green spaces or corridors to increase biodiversity and possibly create footpaths or cycle routes. | N | The baseline assessment presented in Section 10.6 of **ES Chapter 10: Human Health** (Doc Ref. 6.1) considers ward-level data where available and considers available information on agricultural workers, armed forces personnel and veterans.<br>The ES considers local health priorities set out in the Joint Health and Wellbeing Strategy for Lincolnshire (set out in **ES Appendix 10-1: Human Health Legislation, Policy and Guidance** (Doc Ref. 6.3)), with reference to mental health, healthy weight, and physical activity.<br>Engagement with UKHSA, LRSN, and South Holland District Council's Environmental Protection team has formed part of the ES process.<br>A standalone **EMF Compliance Assessment** (Doc Ref. 7.8) has been prepared with the DCO Application, the results of which are summarised within **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1). The **EMF Compliance Assessment** (Doc Ref. 7.8) includes an assessment of the potential EMFs from the Scheme against the exposure limits developed by ICNIRP and considers impacts with existing infrastructure and cumulative effects with the proposed overhead line schemes. Evidence on potential impacts from exposure to radiation has also been considered. A summary of the conclusions of the assessment is presented within **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1). |
| Lincolnshire County Council | **Chapter 14: Other Environmental Topics**<br>**14.3 Human Health**<br>It is not clear what the statement "*It is anticipated that in the absence of the Scheme, PRoW [Public Rights of Way] within the surrounding area would continue to be used*" is trying to convey. It is possible that existing footpaths, and bridleways, etc. would be used less following the development and so how this is to be mitigated and how the network might be improved is important to draw out. The Council would like to see engagement with local rambling and horse-riding groups as well as the Council's | N | The statement appears in the Future Baseline section of the Human Health section of **Chapter 14: Other Environmental Topics** of the PEIR. It indicates that, without the Scheme, there would be no substantial expected future change in the current use of PRoWs within the surrounding area.<br>The British Horse Society (East Midlands), Byways and Bridleways Trust, and Ramblers were consulted on how the |

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| | Environmental team, including active travel officers, to determine how the PRoW network might be best retained and enhanced such as through the introduction of concessionary routes to better connect people and places. | | Scheme may affect the health and wellbeing of the local population, with a focus on access to PRoWs as well as the proposed new permissive pathway through the development. |
| Lincolnshire County Council | **Chapter 14: Other Environmental Topics**<br>**14.3 Human Health**<br>The following comments would be applicable should the Secretary of State be minded to grant consent:<br>• Noise and vibration during construction must be kept to a minimum and only be generated at appropriate times to minimise the effect on human health and wellbeing. Due to the nature of much employment in the area, attention should be paid to shift work that requires people to sleep during the day.<br>• Utilising existing vegetation for screening is welcome. Where new screening vegetation is required, this must be planted early in the development phase to allow it to become established prior to operation. Consideration should be given to new woodland creation. It is welcome that this is proposed in the landscape and visual assessment chapter of the PEIR. However, the impact that loss of vistas across open fields can have on people's mental health should be considered.<br>• Several mitigation measures are proposed during the operational phase:<br>▪ Regular maintenance of landscaping and screening features should also enhance local amenity value (e.g., rewilding, increasing accessible open space and play spaces, allotments, and community growing)<br>▪ The Site Security Plan (SSP) must ensure that fencing and monitoring systems does not create a feeling of enclosure to impacted residents<br>▪ Continued community engagement is welcomed.<br>• It should be confirmed that decommissioning includes substructure, including any underground cabling or overhead powerlines and pylons are to be removed in addition to solar arrays such that the land could be returned to arable farming, but that all environmental improvements that are well established by that time would be retained. | N | **ES Chapter 13: Noise and Vibration** (Doc Ref 6.1) assesses the impact of noise and vibration on human receptors. Details on how noise and vibration emissions will be minimised as far as reasonably practicable are provided in the **OCEMP** (Doc Ref. 7.10). The impact of noise and vibration on shift workers is considered in Section 10.8 of **Chapter 10: Human Health** (Doc Ref 6.1), within the assessment of vulnerable groups, including residents at home during the day.<br>It is acknowledged that negative impacts on landscape and visual amenity have the potential to reduce resident's enjoyment of their environment, in particular their perception of tranquillity and rurality, adversely affecting mental health and quality of life. It is recognised that regular maintenance of landscaping and screening vegetation can improve visual amenity, likely benefitting mental health. The impact on mental health from changes in landscape and visual amenity has been assessed in Section 10.8 of **Chapter 10: Human Health** (Doc Ref 6.1)across construction, operation and maintenance, and decommissioning phases.<br>Security and site fencing is described in Section 2.9 of the **Outline OEMP** (Doc Ref 7.11) which outlines that a 2m 'deer fence' will secure the operational areas of the Solar Development Area and has been designed to minimise feelings of enclosure. **ES Chapter 2: The Scheme** (Doc Ref. 6.1) identifies periodic fence inspection during the operational phase and notes that the maintenance and safety inspections would be carried out by the Applicant or an appointed contractor. Security monitoring requirements will be included within the Detailed OEMP.<br>As outlined in **ES Chapter 2: The Scheme** (Doc Ref 6.1), the decommissioning phase includes removing above-ground physical infrastructure from the Solar Development Areas, Inter-Array Connections, and Grid Connection Route. This would include the removal of all PV Panels, mounting poles, solar stations, substations, Battery Energy Storage System (BESS), 400kV overhead line and pylons, Cabling Sealing End Compounds (CSECs), 132kV overhead line and poles, including |

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| | | | the concrete foundations to these elements to a depth agreed with the relevant landowner, as outlined in **ES Chapter 2: The Scheme**. Land within the Site would be returned to the relevant landowners following completion of decommissioning, including any land where the agricultural resource has been maintained (and potentially improved) during operation, alongside any established habitats. Post-decommissioning, the landowner may return land to arable use. |
| Lincolnshire County Council | **Chapter 14: Other Environmental Topics**<br>**14.5 Waste**<br>It is welcomed that, having initially been scoped out, waste has now been included in the EIA (paragraph 14.5.32). However, although the EIA will focus (as per Table 14-5-1) on landfill capacity, the developer should also give regard to their stated intention to follow the waste hierarchy (paragraph 14.5.30) with landfill being the least preferred option. This aligns with the PINS scoping response (Table 14-5-2). This approach is confirmed at paragraph 14.5.60 and this will need to continue to be a priority.<br>It is noted that at paragraph 14.5.35 quantitative estimates of waste streams will be included within the ES once further information is available.<br>Although the Study Areas identified at paragraph 14.5.38 are acceptable, the developer should ensure that the proximity principle is always considered in the selection of final destinations.<br>At paragraph 14.5.48 it is suggested that, despite the scoping response by the Council and PINS Scoping Opinion (Table 14-5-2) raising the issue of cumulative impacts, it is "*not necessary for each development within the WPA area to duplicate the function of the WPA*" in assessing these. On the contrary, this information needs to be provided so the Council as the WPA can take the impact of cumulative arisings into account in the calculation of how much capacity will be needed. | N | Section 16.6 of **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1) outlines mitigation including aiming to prioritise waste prevention, followed by preparing for reuse, recycling and recovery and lastly disposal to landfill as per the waste hierarchy. The waste hierarchy is also outlined in the **Outline Site Waste Management Plan** (Doc Ref. 7.19), **OCEMP** (Doc Ref. 7.10), **OOEMP** (Doc Ref. 7.11) and **ODEMP** (Doc Ref. 7.12).<br>Section 16.6 of **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1) provides quantitative estimates of waste streams.<br>The requirement to apply the proximity principle is included within the **Outline Site Waste Management Plan** (Doc Ref. 7.19), however, final destination of waste from the Scheme will be confirmed by the Contractor.<br>A cumulative assessment of waste impacts from the Scheme and other developments has been provided at the end of Section 16.6 of **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1). |
| Lincolnshire County Council | **Chapter 14: Other Environmental Topics**<br>**14.5 Waste**<br>Whilst it is correct that Councils have a responsibility to provide sufficient waste treatment and landfill capacity for waste generation at a regional scale (paragraph 14.5.51) the Councils need the forecasts from developers to be as accurate as possible in terms of quantity and type of waste at each stage of their project so that these figures can be fed into forecasting any future capacity gaps. Indeed, given that the Council is currently revising the Minerals and Waste Plan, it is particularly important at this time.<br>The Council welcomes the references to producing a SWMP, CEMP, OEMP and DEMP, (paragraph 14.5.65) and look forward to reviewing these documents at the appropriate time. | N | Section 16.6 of **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1) provides quantitative estimates of waste streams.<br>The historic landfill site noted by Lincolnshire County Council no longer forms part of the Inter-Array Connections.<br>The Applicant can confirm an **Outline Site Waste Management Plan** (Doc Ref. 7.19), **OCEMP** (Doc Ref. 7.10), **OOEMP** (Doc Ref. 7.11) and **ODEMP** (Doc Ref. 7.12) have been submitted as part of the application and welcomes the Council's feedback. |

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| | It is noted that there is an historic landfill site within the Inter-Array Area (paragraph 14.5.76) and the Council would wish to be kept updated, particularly if the situation/design changes and it is considered that excavation may be required. | | |
| Lincolnshire County Council | **Chapter 14: Other Environmental Topics**<br>**14.5 Waste**<br>The Council welcomes the acknowledgement that there would be some replacement of elements during the operational phase (paragraph 14.5.80 and following), however in light of that, the assumption made at paragraph 14.5.88 that "*The amount of waste estimated to be generated is minimal*" is called into question. This is particularly important in light of the current lack of sufficient capacity for recycling PV panels in the UK as recognised at paragraph 14.5.87, which references '*emerging industry*', especially as there is likely to be cumulative waste arising from multiple projects. This will be more crucial during the decommissioning phase (paragraph 14.5.93). The developer should also note that, as per the waste hierarchy, panels/components should be refurbished or reused in preference to recycling.<br>Paragraph 14.5.100 assumes that '*each development considered as part of the cumulative assessment would have embedded mitigation in place and additional mitigation, where necessary, to manage waste streams in accordance with the waste hierarchy and other relevant legislation and guidance*'. This statement appears to pre-judge the impact of cumulative impacts on waste streams and does not take account of the cumulative impacts on available capacity for reuse, recycling, recovery and landfill during construction, operation and decommissioning phases. | N | Section 16.6 of **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1) provides quantitative estimates of waste streams for the Scheme, including that during construction, operational replacement, and decommissioning. The assessment concludes that there will not be any significant residual effects arising from the Scheme associated with waste.<br>A cumulative assessment of waste impacts from the Scheme and other developments has been provided at the end of Section 16.6 of **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1). The assessment concludes that there will not be any significant residual cumulative effects arising from the Scheme associated with waste. |
| Lincolnshire County Council | **Chapter 14: Other Environmental Topics**<br>**14.5 Waste**<br>It is noted that at paragraph 14.5.100 that a cumulative assessment will be undertaken at the ES stage and look forward to assessing these impacts.<br>Further to the identification at paragraph 12.6.50 that the south west corner of PV Array area A1 encroaches into a Sand and Gravel Mineral Safeguarding Area (MSA) as identified in both the current and emerging MWLP. It is noted that at paragraph 14.5.91 it is stated that "*that any below ground infrastructure would be left in situ following decommissioning*" which could introduce a constraint to the potential for any future extraction of the mineral resources. The PEIR does not include any information on the baseline conditions in relation to the minerals resource within the site boundary. As per the PINS Scoping Opinion, the ES should assess the potential for the temporary or permanent sterilisation of mineral resources, where significant effects are likely. | N | A cumulative assessment of waste impacts from the Scheme and other developments has been provided at the end of Section 16.6 of **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1). The assessment concludes that there will not be any significant residual cumulative effects arising from the Scheme associated with waste.<br>Mineral Safeguarding Areas have been considered in **ES Chapter 14: Socio Economics and Land Use** (Doc Ref. 6.1). The assessment concludes that there will not be any significant residual effects on mineral resources as a result of the Scheme.<br>Regarding decommissioning of underground cabling, as stated in the **ODEMP** (Doc Ref. 7.12), the mode of any underground cable decommissioning will be dependent upon Government policy, best practice and landowner agreement at that time. If required, 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 up the entire length of the cable |

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| | | | route. The final approach will be determined at the time of decommissioning and detailed within the detailed DEMP, which will require approval from the local planning authority. |
| Lincolnshire County Council | **Chapter 14: Other Environmental Topics**<br>**Fire and Rescue**<br>At this PEIR stage and with so much optionality available regarding what BESS technologies/components are selected, the position is not advanced enough for the exact details to have been provided in the document which would encourage detailed comment. As is recognised, "*greater definition of Scheme activities associated with the BESS is required to better define the impacts associated with the rare incident of a fire to the BESS and increase confidence in the conclusions.*" (paragraph 14.2.155).<br>The regular reference to fire events at these projects being "rare" is questioned, especially as what they consider "rare" does not appear to be defined. As these sites involve emerging technology, it may prove to be that there has simply not been enough time elapsed to accurately predict the likelihood of such events at these premises.<br>There are however some assurances that fire remains a serious consideration. Table 14-6-3 Major Accidents and Disasters Assessment confirms that "Fire and Explosions" has been identified in the "Short Listed Major Accident or Disaster" assessments, both in terms of air quality impacts and the fire / explosion risk. Further, paragraph 14.6.53 references the National Fire Chiefs Council guidance for Grid Scale Battery Energy Storage planning, providing the reassurance that the National Fire Chiefs' Council (NFCC) guidance for this element is being followed and which is the guidance behind Lincolnshire Fire and Rescue's (LFR) position. | N | The appropriate management of fire risk remains a serious consideration for the Applicant and so the Applicant has instructed an **Outline Battery Safety Management Plan (OBSMP)** (Doc Ref. 7.18) to minimise and manage this risk. **The OBSMP** (Doc Ref. 7.18) sets out the BESS safety and firefighting requirements. This has been developed in consultation with the Lincolnshire Fire & Rescue Service, and will be finalised and implemented following further consultation at the point of detailed design in accordance with the requirements of the **Draft DCO** (Doc Ref 3.1).<br>An Unplanned Emissions Assessment has been undertaken and considers the potential emissions that could be emitted during a thermal runaway event (**ES Appendix 16-4: Unplanned Emissions Assessment from Battery Energy Storage System** (Doc Ref. 6.3). Detailed plume modelling would be undertaken at detailed design stage to confirm the suitability of the design. |
| Lincolnshire County Council | **Chapter 14: Other Environmental Topics**<br>**Fire and Rescue**<br>Paragraph 14.6.71 (as quoted below) is a key section as it clarifies what control measures the BESS infrastructure will ultimately include (AFD, suppression systems etc.). These elements need to be reflected in the final design to ensure compliance with the guidance provided by the NFCC:<br>"*An outline Battery Storage Safety Management Plan (BSSMP) would be submitted as part of the DCO application, outlining the overarching measures to manage risk in relation to the BESS in accordance with the relevant regulatory frameworks. A detailed version of plan will be submitted to SHDC for approval post-consent prior to the commencement of the operational phase. The BESS would include automatic fire detection and suppression systems, an above ground water storage tank to be co-located at each BESS and On-Site Substation Compound. Depending on the specific BESS technology adopted, a heating ventilation and air conditioning (HVAC) would be implemented to ensure batteries operate safely and efficiently. This would either be externally mounted or housed within the BESS containerised units. Specific implementation is subject to evolving technology and refinement to the design of the Scheme as it progresses.*" | N | As described within the **OBSMP** (Doc Ref. 7.18), potential boundary cooling water ingress points such as Heating, Ventilation and Air Cooling (HVAC) systems and deflagration vents will be considered as part of an incident response strategy.<br>Furthermore, cooling of the battery modules will be provided by an independent liquid cooling system which is separate to the HVAC system. If temperatures exceed critical limits or the climate control system fails, the BESS will automatically shut down. These measures will reduce the fire risk associated with overheating from battery storage, including during heat waves. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | It is noted that there is a slight discrepancy with the above paragraph and the information in Table 14-6-5 Preliminary Assessment of Major Accidents and Disasters which suggests that the cooling units (presumably HVAC) will be a "mitigation measure":<br><br>"*Fire and explosions: The risk of fire as a result to the Scheme due to the BESS facility is considered low, with mitigation measures incorporated into the design. Cooling units would be utilised to regulate the temperature of the BESS with fire suppression systems installed as a precautionary measure. Switchgears would ensure BESS are isolated in the event of overloads and faults. The BESS and associated grid infrastructure would be sited away from sensitive receptors."* whereas paragraph 14.6.71 leaves the door open that the cooling units will be dependant on the type of technology which is ultimately used. | | |
| Lincolnshire County Council | **Chapter 14: Other Environmental Topics**<br><br>**Fire and Rescue**<br><br>As the project progresses and more details about the specific technologies involved become available, LFR will need to ensure that the approach remains holistic and does ultimately conform to the general principles which have been included in the PEIR. The potential issues will arise if there are later deviations from the standards outlined in the PEIR.<br><br>In summary, the threat from fire has been recognised along with the onus on the operator to mitigate this through the design: "*Identified risks can be effectively mitigated through design and operational management"* (Table 14-6-5).<br><br>In the PEIR Volume II Figure 2.1 '*Indicative BESS and onsite substation compound locations'* appears to show that the main 400kV BESS and on-site substation compound location will be immediately adjacent to the A16 Crowland Bypass. With such a large footprint for this site, and its proximity to the A16 Crowland Bypass, this proposed location could present difficulties to LFR. It is requested that the scope for the main 400kV BESS and on-site substation compound location to be located further away from the main road be explored. | N | As the design progresses and the BESS technology is confirmed, the Scheme will continue to be developed in accordance with the principles set out in the Design Approach Document (Doc Ref. 7.3).<br><br>The **Works Plans** (Doc Ref. 2.3) provide flexibility for micrositing the 400kV On-Site Substation and BESS Compound and to provide a buffer from the A16.<br><br>Requirements 5 and 6 within Schedule 2 of the **Draft DCO** (Doc. Ref. 3.1) require that detailed design and the battery safety management plan, respectively, are approved by Lincolnshire County Council prior to commencement. Further, Requirement 6 stipulates that Lincolnshire Fire and Rescue be consulted on the battery safety management plan prior to approval. |
| Lincolnshire County Council | **Chapter 15: Cumulative Effects**<br><br>In paragraph 3.2.7 it is noted that NGET advised that a new large scale NGET substation (subsequently called the Weston Marsh Substation) was proposed to be constructed to facilitate network reinforcement works in the area and to enable grid connections for offshore wind farms off the coast of Norfolk. A subsequent grid connection application was made for connection to the proposed substation and which influenced the solar farm location which was subsequently developed.<br><br>The ES will need to take into account the cumulative effects of construction and operation of the of the new Weston Marsh substation alongside the other schemes connecting into the Weston Marsh substation. The new substation will be a permanent feature and not decommissioned at the end of the proposed Meridian project period (40 years) unlike the 'temporary' solar development. Therefore the ES will need to make a clear distinction between those impacts which it might view as temporary and those which would be permanent. | N | The cumulative effects of the Scheme along with the other Schemes connecting to the Weston Marsh substation have been assessed within the cumulative effects sections of **ES Chapters 5-16** (Doc Ref. 6.1). Temporary and permanent effects have been identified, as relevant for each topic assessment. Furthermore, **Interrelationships with Other Infrastructure Projects** (Doc Ref. 7.2) has been submitted with the DCO Application to summarise the key interactions with cumulative schemes. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | Meridian is currently the only NSIP solar farm in Lincolnshire to have opted to connect to the National Grid substation via overhead transmission lines. The proposed substation at Weston Marsh is also the recipient of other overhead transmission schemes, namely Grimsby to Walpole (which proposes to construct this substation) and Weston Marsh to East Leicestershire. The cumulative impact of the Meridian Scheme overhead transmission lines will therefore need to be assessed in conjunction with the National Grid schemes identified above. | | |
| Lincolnshire County Council | **Chapter 15: Cumulative Effects**<br><br>At paragraph 15.4.9 it is noted that a search period of five years preceding the planned initiating year of the construction phase of the Meridian Scheme of 2027, has been used to identify other committed developments as part of the long list. It is questioned whether Section 73 applications under the Town and Country Planning Act 1990, as amended, have been included in this list as this provides a new permission?<br><br>With regard to Table 15-1 (row 1) the PINS Scoping Response states '*some planning applications granted over three years ago may have a commencement date of greater than three years (e.g. DCOs) and these should not be excluded from the assessment'*. The 'response/action' to this states that Planning Applications within 5 years of commencement of the construction phase (earliest being 2027) have been considered as part of the inter-project cumulative effects assessment. Should this read 'Planning Permissions within 5 years' rather than 'Planning Applications' as this provides more certainty of delivery and is in line with the definition of reasonably foreseeable future projects.<br><br>Table 15-3 should also include non-designated heritage assets.<br><br>Table 15-4 Preliminary Intra-Project Cumulative Effect Assessment (Construction Phase)<br><br>• should include non-designated heritage assets<br><br>Table 15.5 Preliminary Intra-Project Cumulative Effect Assessment (Operational Phase).<br><br>• Agricultural land and farm holdings – in line with the PINS Scoping Opinion, the cumulative economic impacts from the loss of agricultural land should also be included.<br><br>• Should include non-designated heritage assets. | N | Developments that have planning permission or are allocated within adopted development plans (known as 'committed developments') have been factored into the assessment, as described in Section 4.7 of **ES Chapter 4: Overview of the EIA Process** (Doc Ref. 6.1). The long list of cumulative schemes considered is provided within **ES Appendix 4-1: List of Cumulative Schemes** (Doc Ref. 6.3). The search for cumulative schemes also included Section 73 applications. Town & Country Planning Applications that meet the cumulative schemes search criteria and which have been granted consent within the last three years were included on the long-list of cumulative schemes. The long-list of cumulative schemes was shared with LCC and SHDC for comment during the pre-application stage, with comments received considered as part of finalising the list of cumulative schemes for assessment.<br><br>Cumulative effects on non-designated heritage assets have been considered within Section 8.11 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). Cumulative effects on agricultural land holdings have been considered within Section 14.11 of **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1). |
| Lincolnshire County Council | **Chapter 15: Cumulative Effects**<br><br>The Council requests that a mechanism such as that adopted by the Examining Authority (ExA) for the solar projects in western Lincolnshire where each applicant was required to produce an inter-relationship report at the start of their examination which is subsequently updated at each deadline during the examination. A further example is the Outer Dowsing Off-Shore wind project in the east of Lincolnshire; an interrelationship report considering all current NSIP's in Lincolnshire was submitted to that examination.<br><br>These reports capture information from emerging NSIPs and as details about the projects becomes available, requires the applicant to undertake further assessments to evaluate how these impact on the | N | An interrelationship report is contained within **Interrelationships with Other Infrastructure Projects Report** (Doc Ref. 7.2). The Applicant will review the potential impact of future NSIPs as they emerge. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | cumulative impact assessments that have been prepared in the submitted ES. This will provide the ExA, the host authorities and others an opportunity consider the potential cumulative impacts from all these projects as they emerge and the necessary mitigation measures that will be needed. | | |
| Lincolnshire County Council | **Community Benefits**<br><br>Meridian is keen to receive suggestions as part of this consultation about how the scheme can benefit the local community. It is noted that one of Meridian's objectives is to work with the local community to support community initiatives throughout the lifetime of the Scheme and as part of this consultation The Stage 2 consultation information booklet suggests the project would contribute around £500,000 per annum.<br><br>It is suggested that the Fund is administered by a recognised grant awarding body such as the Lincolnshire Community Foundation. Council officers and Public Health would like to remain involved in ongoing community engagement, development of the grant criteria and the allocation of the Community Fund.<br><br>The PEIR has covered potential negative impacts on human physical health. However, there are few proposed enhancements that may improve the health and wellbeing of the local population.<br><br>Please note the Planning and Infrastructure Bill which is currently progressing through the House of Commons provides for ensuring local communities benefit through the creation of a bill discount scheme for people living closest to new electricity transmission infrastructure. Regulations made under the Bill will set out eligibility for the scheme and the operation of the scheme, including how the discount will be applied, the amount of discount that will be provided and the length of time it will be applied for. It is suggested that a commitment is made to this approach in advance of the Act and associated regulations coming into effect. | N | The Applicant notes this comment. Information on community benefits provided by the Scheme is set out within the Planning Statement (Doc Ref. 7.1). In terms of health and wellbeing this is assessed in **ES Chapter 10: Human Health** (Doc Ref. 6.1). The Applicant has designed the Scheme to avoid impacts on mental and physical health where possible e.g. through ensuring PRoW closures and diversions are kept to a minimum throughout the construction phase.<br><br>The Applicant is currently investigating how a Community Benefit Fund could be managed and delivered independently, however, it does not propose to use the community benefit fund to subsidise energy bills.<br><br>The Applicant considers that a more appropriate use of funds would be to invest in local projects that current and future generations would have access to, therefore leaving a lasting legacy from the Scheme.<br><br>The Applicant notes the enactment of the Planning and Infrastructure Act 2025, which introduces a statutory framework under section 38A enabling the establishment of a scheme for the provision of bill discounts for homes located near new electricity transmission infrastructure.<br><br>Section 38A confers a power on the Secretary of State to establish such a scheme by regulations. In particular, section 38A(4) provides that regulations may make detailed provision in relation to the operation of the scheme, including eligibility criteria, the nature and administration of benefits, cost recovery, withdrawal of benefits and enforcement. Those regulations have not yet been made.<br><br>The Applicant therefore considers it premature to make a project-specific commitment in advance of the relevant regulations coming into force. However, the Applicant will comply with any statutory obligations that apply to the Scheme once the relevant regulations are in effect. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Lincolnshire County Council | **Community Benefits**<br>Further suggestions are made below towards which community funds could be directed:<br>'Energy Projects':<br>• The developer may consider funding 'energy projects', to deliver against the Council's strategic priorities and local demand. Contributions can be paid into a strategic energy fund to deliver projects, such as:<br>▪ Energy and the future (housing): Explore innovative and rural, local retrofit programmes that are delivered by Local Authorities and partners. This should include expanding the retrofit offer to include EPC D properties, incentivising the 'able to pay' market to be early adopters, building a local supply chain for skills in our hard to reach communities (e.g. over 50s, NEETS and people leaving the Defence sector) and advanced manufacturing sectors.<br>▪ Fuel Poverty and business growth: Opportunities for innovative rural heating programmes, which may include rooftop solar and rural heat networks. The Council would look for resources to set these up as community energy programmes, sustainable in the long-term.<br>▪ Rural Energy Pathways: Procurement of specialist technical support to identify opportunities for local people to benefit from community led energy projects. Identifying, scoping and providing the business case for sustainable local energy projects requires investment in long term technical support. The Council would look for investment to help secure this support, to enable local projects to develop at pace, have sustainable, long-term outcomes, and directly deliver against evidenced challenges.<br>▪ Energy and growth: Access to affordable (possibly subsidised) electricity for low-carbon vehicles. This may be via a community led project, with local EV charging points or incentives to make EV more affordable for local people. | N | Regarding community benefits, the Applicant is committed to establishing a Community Benefit Fund associated with Meridian Solar Farm. This fund will be made available to support important causes, services, and facilities in the local area. Engagement undertaken to date as part of the Project's consultation has sought feedback from local communities on potential priorities, and the Applicant will continue to work with local stakeholders to determine the most effective way to distribute funding should the Project be consented.<br>The Applicant further confirms that it would be open to future engagement with Lincolnshire County Council regarding the delivery of a community benefit fund. |
| Lincolnshire County Council | **Community Benefits**<br>• The developer may consider funding 'energy projects', to deliver against the Council's strategic priorities and local demand. Contributions can be paid into a strategic energy fund to deliver projects, such as:<br>▪ Network capacity: While National Grid substations near Spalding are currently displaying distribution capacity (Ref: www.nationalgrid.co.uk/network-opportunity-map), three other substations within South Holland are displaying increasing capacity constraints when other contracted proposals are taken into account. | N | |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | ▪ Shortage of energy supply may restrict existing and potential businesses from achieving their potential growth and may limit, and impact on the decarbonisation of these businesses. The Council would like to explore opportunities where local businesses and communities may need support to access the energy they need to achieve their growth and carbon reduction ambitions.<br>▪ Skills and raising aspirations: As detailed below, we would like to explore opportunities for investment in the development of the local energy sector to encourage, incentivise, and raise the aspirations of the local workforce. This will include targeted marketing, skills provision and development, and ensuring procurement of the supply chain prioritises local businesses. | | |
| Lincolnshire County Council | **Community Benefits**<br>Accessibility of employment sites to rural communities:<br>• Information and Collaboration;<br>• Access to Construction Employment, Up-skilling and Re-skilling;<br>• Opening up the Supply Chain.<br>For example:-<br>• Funded travel to work schemes – LCC is able to help scope and identify suitable projects in the study area.<br>• Engagement and partnership with local transport providers.<br>• Support for local people to access private transport at reduced cost, where the above solutions are not possible (last resort).<br>• Where possible, these transport schemes should encourage use of a low carbon vehicle and ensure there is provision for EV charging at the site to encourage use of EVs for the journey to work. | N | **The Outline Skills, Supply Chain and Employment Plan** (Doc Ref. 7.17) sets out a variety of interventions which the Applicant would pursue post-consent to maximise the economic benefits of the Scheme. The production of a Final Skills, Supply Chain and Employment Plan, which will be subject to approval by South Holland District Council, is secured through the **Draft DCO** (Doc Ref 3.1).<br>Regarding community benefits, the Applicant is committed to establishing a Community Benefit Fund associated with Meridian Solar Farm. This fund will be made available to support important causes, services, and facilities in the local area. Engagement undertaken to date as part of the Project's consultation has sought feedback from local communities on potential priorities, and the Applicant will continue to work with local stakeholders to determine the most effective way to distribute funding should the Project be consented. |
| Lincolnshire County Council | **Community Benefits**<br>Local labour market: Consideration could be given to preparing the local labour market for the forthcoming opportunities. This could include:<br>• Local provider engagement at an early opportunity.<br>• Sector development support, to allow local supply chain to prepare existing workforce, and build and encourage opportunities to grow the workforce.<br>• Bespoke activity that encourages our evidenced 'hard to reach' and opportunity potential workforce (over 50's, retired military etc) to access new skills and jobs. | N | |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | • Raising aspirations within the local communities: Evidence shows that low aspirations in the communities is a key blocker to accessing employment. Such a high profile project can help raise aspirations in local communities by supporting local incentives and schemes. This will support the project by unblocking barriers to local people accessing employment. This will need to be funded activity by the developer. | | |
| Lincolnshire County Council | **Community Benefits**<br><br>Please note the Department of Energy Security and Net Zero's recent publication of "*Community funds for transmission infrastructure*" (updated 9 April 2025) sets out a menu of potential benefits to enhance the economy, society and/or environment in a local area impacted by new electricity transmission infrastructure. These are:<br><br>• Provide community funding to support training and skills development. The developer would be required to explain how such benefits are additional to what they would have delivered in the ordinary course of business.<br><br>• Supporting the community to tackle fuel poverty, for example by funding energy efficiency improvements for households on low incomes or households in fuel poverty.<br><br>• Supporting the community with the net zero transition, through projects such as transitioning from oil heating and investment in local, community owned, low carbon energy generation.<br><br>• Outreach initiatives and training opportunities. This could include supporting local schools and colleges with insight days to foster student interest in STEM subjects and providing opportunities for developing skills.<br><br>• Helping to improve the local natural environment, including priorities identified in a local nature recovery strategy, for example by improving local parks and increasing biodiversity in community spaces, community gardens, wildlife projects for recreational or educational use and community nature trails.<br><br>• Investment to improve local shared infrastructure such as health centres.<br><br>• Building a stronger and more inclusive community focussed on supporting more vulnerable groups, for example by supporting digital skills and inclusion projects, or investing in step-free access improvements to local facilities.<br><br>• Supporting the local economy and skills, for example through training opportunities.<br><br>• Providing opportunities for future generations, for example by building or improving facilities for young people.<br><br>• Supporting local strengths and assets, such as tourism, the arts, culture and local heritage. | N | The Applicant notes the publication of the Department for Energy Security and Net Zero's guidance on *Community Funds for Transmission Infrastructure* (updated April 2025). As the design and consenting stages progress, the Applicant will continue to review the potential for community benefit initiatives consistent with this guidance, including opportunities linked to skills, training, local environment, and community resilience. These have also been reflected within the **Outline Skills, Supply Chain and Employment Plan** (Doc Ref. 7.17) submitted with the DCO Application. |

## 2.14. Moulton Parish Council

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Moulton Parish Council | Moulton Parish Council would like to make you aware of many residents against your plans for the future. The loss of such valuable farmland is the main most common comment we hear. We are a farming community that relies on good quality land to grow crops. | N | The Applicant notes the concern regarding farmland. The option for managing grassland within the Solar Development Area via sheep grazing has been provided for within the **OLEMP** (Doc Ref. 7.16), which (should there be interest from the local farming community) could enable continued employment and farm business opportunity on the Site.<br><br>In terms of the impact of the Scheme on farmland, this is assessed within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) which concludes that from the commencement of construction, the long-term restriction to agricultural use of the ALC Grade 1 and 2 land within the Solar Development Area as a result of the construction of the solar panels and associated infrastructure is considered to represent a significant adverse effect. However, following decommissioning, the land would be returned to the landowner for agricultural use. In addition, part of the Scheme will involve the creation of hardstanding for associated infrastructure. All structures will be removed at decommissioning, and the land will be restored, but where this infrastructure is located on ALC Grade 1 or Grade 2 land, there is greater uncertainty about whether the land can be returned to its former ALC grade. Therefore, this is considered to comprise a significant effect. No significant effects from restriction to agricultural use are expected within the Inter-Array Corridors or the Grid Connection Route, as the area and duration of soil disturbance starting from construction would be much more limited.<br><br>Good practice environmental management measures have been set out within the **OCEMP** (Doc Ref. 7.10), **OOEMP** (Doc Ref. 7.11) and **ODEMP** (Doc Ref. 7.12). These include measures to minimise the risk of contamination of soils as a result of the Scheme, and measures for the protection of existing land drainage. Furthermore, the **Outline Soil Management Plan** (Doc Ref. 7.14), submitted with the DCO Application, provides a comprehensive set of measures across the lifetime of the Scheme for the preservation of the soil resource within the Site. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Moulton Parish Council | Another factor being the environmental impact in regards to wildlife and the lorries and equipment on the small roads that would be needed to build such a project. The roads are failing as it is with dykes falling in due to them not being strong enough for the large traffic. | N | **ES Chapter 15: Traffic and Access** (Doc. Ref. 6.1) sets out the proposed construction routing (see **ES Figures 15-3** and **15-4** (Doc. Ref. 6.2)).<br><br>The **Outline CTMP** (Doc. Ref. 7.13) provides further information on the proposed construction traffic management during the construction phase. Appropriate routing of vehicles and HGVs will be adopted to minimise the impact on more sensitive and rural roads. This approach was discussed and agreed with the LHAs in the Transport scoping meeting in September 2025. Construction traffic will adopt the most appropriate routes to and from the Scheme via the A16 and A151 for the Grid Connection Route, with internal movements undertaken via internal Haul Roads to reduce limit the movements (other than crossing) on more rural/ sensitive roads (where practical). Furthermore, as set out within the **Outline CTMP** (Doc Ref. 7.13), a road condition survey will be carried out pre-construction, during construction and post-construction, to identify any defects that arise to highways assets/verges during the construction phase of the Scheme for reinstatement. |
| Moulton Parish Council | I don't think I need to go on anymore as it is clear how everyone feels. We have not had one single councillor or resident in support of your scheme! | N | The Applicant notes this comment. |

## 2.15. Natural England

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Natural England | **Comments on the PEIR and supporting documents**<br>**1. Internationally Designated sites**<br>1.1 Study area<br>1.1.1 Natural England note that a Study Area of 15km has been used for Internationally Designated sites (Paragraph 7.4.1). **NE recommend that a study area of 20km is used**, noting that some features of these sites have a foraging range of up to 20km (e.g. Geese, Swans, Lapwing etc). Table 7-10 notes that the Wash SPA/Ramsar site is outside the ZoI for the PV area. Where a 20km study area is used, this would not be the case; **NE advise that impacts to species associated with the Wash SPA/Ramsar should be considered from loss/disturbance of foraging/roosting habitat within the PV area, as well as the grid connection**. Aside from this, all of the relevant Internationally Designated sites have been identified for this project (Table 7-7) & no further sites would be captured with this larger search area.<br>1.1.2 Through NE's Discretionary Advice Service, a Habitats Regulations Assessment (HRA)Evidence Plan has been consulted upon, and subject to minor amendment is likely to be agreed soon. The plan sets out the sites & impact pathways to be considered within the Report to Inform the HRA, alongside the evidence requirements to support the assessment. NE anticipate further engagement via our Discretionary Advice Service (DAS) on the draft report to inform the HRA prior to submission. | N | The study area has been increased to 20km for **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3) for the consideration of impacts on species such as geese, swans, and lapwings, associated with Internationally Important Wildlife Sites (IIWS). |
| Natural England | 1.2 Ornithology Survey Methodology<br>1.2.1 Natural England have worked with the applicant on the scope of ornithological survey required to inform the Habitats Regulations Assessment through DAS. **Overall, Natural England are content that the survey scope is suitable to inform the HRA**. Nonetheless, NE have reviewed the survey reports and provided our comments as part of this response.<br>1.2.2 It has been agreed with the applicant that impacts to breeding features of the relevant SPA/Ramsar sites can be scoped out of the assessment. As such, NE's comments on the Breeding Bird Survey Report (Appendix 7-2) are included at Annex 2 as these do not relate directly to impacts to designated sites, but were considered valuable in the wider context of ornithological assessment in the ES. NE's comments on the Wintering Bird Survey Reports (Appendices 7-3, 7-4 & 7-5) are set out in Table 1 Below. | N | The Applicant notes this comment. |
| Natural England | 1.3 SPA Qualifying Features<br>1.3.1 It is noted for the Wash SPA and Nene Washes SPA that the qualifying features listed at Table 7-7 are not exhaustive. It is noted that the JNCC's SDF (Standard Data Form) may have been used to determine qualifying features. NE advise that the SPA Citations should be used to identify all qualifying features. In particular, NE note that at Table 7-10, not all waterbirds have been considered as | N | All waterbirds identified within the data search for the SPAs have been included for consideration within **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3) and **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | qualifying features of The Wash SPA/Ramsar site. **It is NE's advice that all waterbirds should be considered as part of the overarching waterbird assemblage for this Site.** | | |
| Natural England | 1.4 Preliminary Impact Assessment<br>1.4.1. Table 2 below contains Natural England's advice on the preliminary assessment of impacts to Internationally designated sites.<br>1.4.2. As an overarching comment on the survey reports, NE advise that it would be helpful if bird survey reports could be combined by season. | N | Information on wintering bird survey results is presented in the following ES appendices (Doc Ref. 6.3):<br>• **ES Appendix 9-4: Wintering Bird Survey Report 2022-2023.**<br>• **ES Appendix 9-5: Wintering Bird Survey Report 2023-2024.**<br>• **ES Appendix 9-6: Grid Connection Route Wintering Bird Survey Report 2023-2024;**<br>• **ES Appendix 9-10: Vantage Point Survey Report.**<br>Information on breeding bird survey results in presented in the following ES appendices (Doc Ref. 6.3):<br>• **ES Appendix 9-3: Breeding Bird Survey Report;**<br>• **ES Appendix 9-13: Common Crane Survey Report 2025.** |
| Natural England | **Appendix 7-3 Wintering Bird Survey Report 2022-23 (PV Area Only)**<br>3.43 Lapwing: The peak count of 500 Lapwing is noted. Lapwing should be considered part of the waterbird assemblage for which the Wash SPA/Ramsar sites are designated. | N | Lapwing has been considered as part of the waterbird assemblage of the Wash SPA / Ramsar site within **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3) and **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |
| Natural England | **Appendix 7-3 Wintering Bird Survey Report 2022-23 (PV Area Only)**<br>3.80 Crane: The peak count of 4 crane is noted. Any record of Crane is potentially of National importance. This should be taken into consideration within the ES. | N | Consideration of Crane presence being of national importance has been discussed within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |
| Natural England | **Appendix 7-3 Wintering Bird Survey Report 2022-23 (PV Area Only)**<br>3.130 Whooper Swan: The Peak Count of 82 whooper swans is noted. Whooper Swan should be considered as part of the waterbird assemblage for which the Wash SPA/Ramsar sites are designated. | N | The Wash SPA/Ramsar site is designated for its waterbird assemblage, and whooper swan have therefore been considered within the assessment of potential impacts on the assemblage species within **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3) and **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |
| Natural England | **Appendix 7-4 Wintering Bird Survey Report 2023-24 (PV Area Only)**<br>Table 2.3: The definition of County importance is different from the 2022-23 wintering bird report and states 1% rather than 10%. This discrepancy should be clarified, along with the definition used to inform the ES chapter. | N | It is noted that the definition of County importance used within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) differs from that used in **ES Appendix 9-4 Wintering Bird Survey Report 2022-2023** (Doc Ref. 6.3). A threshold of 1% of the relevant geographic population has been adopted in the ES chapter (rather than the 10% of county population that is often applied in ornithological assessment) to ensure consistency with the |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | | | Ramsar Convention on Wetlands (criteria 6), JNCC, WeBS and CIEEM guidelines. |
| Natural England | **Appendix 7-4 Wintering Bird Survey Report 2023-24 (PV Area Only)**<br>3.23 – Lapwing: There is a differing conclusion between the 2022-23 and 2023-24 wintering bird survey reports regarding the evaluation of a peak count of 500 lapwing. They are considered to be of County importance in this document but of Local Importance in the earlier report. This discrepancy should be clarified, although it is noted that PEIR Table 7-10 describes the Lapwing population as of County importance. | N | The apparent discrepancy arises from the application of updated guidance and interpretation between survey years. The 2023–24 assessment has adopted the more precautionary evaluation of County importance, consistent with current CIEEM (2022) guidance, which states that site value should reflect the higher of potential classifications where uncertainty exists.<br>For clarity and consistency, **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) presents the County-level evaluation, aligning with the precautionary principle and the approach already taken in PEIR Table 7-10. |
| Natural England | **Appendix 7-5 Wintering Bird Survey Report 2023-24 (Grid Connection Corridor)**<br>2.2 – Methodology: As it stands, no data has been gathered from the Wildlife Trust or other sources as requested – this is likely to be of particular importance regarding common crane. Please pursue the Wildlife Trust for data on Crane and other priority species. | N | Relevant stakeholders, including the Lincolnshire Wildlife Trust, BTO and RSPB have been approached to request relevant data to inform the assessment, as set out within Table 9-3 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). Data on common crane has been received from Lincolnshire Wildlife Trust and this has been used to inform the ES. |
| Natural England | **Appendix 7-5 Wintering Bird Survey Report 2023-24 (Grid Connection Corridor)**<br>2.8 & 2.10 – VP duration: It is stated that deviation has been made from the NatureScot guidance from 36 hours per VP, to 15. This is described as 'proportionate'. It is unclear why this is considered proportionate, clarity should be provided. Please state if the full 36 hours will be/has been undertaken for the 2024-25 VP surveys. | N | A proportional approach was taken to vantage point surveys in 2023-24 (see **ES Appendix 9-5** (Doc Ref. 6.3)), which were intended primarily to inform scoping and route selection as options were still under consideration at that time. Subsequent vantage point surveys in 2024-2025 (see **ES Appendix 9-10** (Doc Ref. 6.3)) have been based on the full 36 hour survey effort as set out in NatureScot guidance. |
| Natural England | **Appendix 7-5 Wintering Bird Survey Report 2023-24 (Grid Connection Corridor)**<br>2.11 – Adverse conditions: It is stated that surveys would not be conducted during heavy rain, wind or visibility obscuring weather. However, Table 2.5 states that the following surveys had poor weather/visibility:<br>1.21/12/23 VP1 – Wind Beaufort 9-8<br>2.13/03/24 VP1 – Wind Beaufort 6<br>3.21/12/2023 VP2 – Wind Beaufort 10-9<br>4.13/03/2024 VP2 – Wind Beaufort 6-7<br>5.12/03/24 VP3 – 'Persistent rain and poor visibility for the duration of the survey' noted. | N | Where surveys were affected by severe weather conditions, the surveys are still considered to be valid, but the conditions have been noted as limitations and, where appropriate, assessment has take account of these. Further surveys have been undertaken in 2024-2025 (see **ES Appendix 9-10** (Doc Ref. 6.3)). Conclusions presented within **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3) and **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) are therefore based on data from all surveys undertaken in 2023-2024 and 2024-2025. |

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| | Please confirm if these surveys are considered valid or not. It is acknowledged that survey information across varying weather conditions is helpful, however, the reduced duration of VP survey and potentially unrepresentative data caused by adverse conditions may need to be considered as limitations. The assessment should be precautionary to reflect this. | | |
| Natural England | **Appendix 7-5 Wintering Bird Survey Report 2023-24 (Grid Connection Corridor)**<br>2.11 & 4.8 - Shooting Disturbance: 23/02/24 VP4 was noted to have disturbance from the shooting club: 'Busy day at the shooting club adjacent to VP4. Lots of gun fire, causing disturbance to birds'. Para 4.8 later states that 'Shooting and the use of bird scarers did not appear to have any influence on bird activity in the viewsheds for VP3 and 4'. Please provide clarity on the effect of the shooting club on survey effort and whether this is considered a survey limitation. The behaviour of birds in response to bird scarers and disturbance may also be relevant to the overall assessment. | N | Shooting at the shooting club did not limit survey effort at VP3 or VP4. Influence on bird activity was not considered to be significant and data during these times provides representative coverage of varying baseline conditions. This is therefore not considered to be a limitation to the assessment. |
| Natural England | **Appendix 7-5 Wintering Bird Survey Report 2023-24 (Grid Connection Corridor)**<br>4.3 - Discussion and Recommendations: White fronted geese are very scarce in this area so this record is notable. Please highlight this species when assessing results from all surveys. White Fronted Geese should be considered as part of the waterbird assemblage for which the Wash SPA/Ramsar sites are designated. | N | White fronted geese have been considered as part of the waterbird assemblage feature of The Wash SPA/Ramsar site, and have therefore be considered within the assessment of potential impacts on assemblage species in **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3), as well as being considered as a notable species in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |
| Natural England | **Appendix 7-5 Wintering Bird Survey Report 2023-24 (Grid Connection Corridor)**<br>4.4 – Unfinished paragraph: This paragraph ends mid-sentence. Please complete this paragraph. | N | **ES Appendix 9-5: Wintering Bird Survey Report 2023-24** (Doc Ref. 6.3) has been updated accordingly**.** |
| Natural England | **Appendix 7-5 Wintering Bird Survey Report 2023-24 (Grid Connection Corridor)**<br>4.5 – SPA/ Ramsar species: All wildfowl and wader species are considered to be part of the Waterbird Assemblages for SPAs. Please consider all waders and wildfowl as qualifying species components of the waterbird assemblage of The Wash SPA/Ramsar. | N | All waders and wildfowl have been included as part of the assemblage of the Wash SPA/Ramsar with regards to the impact assessment within **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3) and **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |
| Natural England | **Appendix 7-5 Wintering Bird Survey Report 2023-24 (Grid Connection Corridor)**<br>4.9 – Mitigation recommendation: This paragraph states: 'Regardless of route selection, consideration should be given to the use of Bird Flight Divertors on the transmission lines as a preventative measure, otherwise it is likely that a full suite of surveys to total 72 hrs of observations at each vantage point will be required over a 12-month period.' Natural England disagree with this statement, and advise that all mitigation design should bedriven by robust survey effort & assessment. | N | Bird diverters have been incorporated into the Grid Connection Route design as mitigation where assessment has identified potential risk on a precautionary basis, proportionate to the level of survey effort. The provision of bird diverters is secured through the **Design Parameters** (Doc Ref. 7.4). |
| Natural England | **Comments on the Preliminary Assessment of Likely Significant Effects Upon Internationally Designated Sites**<br>**Impact pathway:** Loss/Disturbance of Functionally Linked Land (Construction) – Wintering Birds<br>**Relevant site:** The Nene Washes SPA & Ramsar The Wash SPA & Ramsar<br>**Comment:** Paragraph 7.8.1 identifies potential disturbance impacts to Functionally Linked Land (FLL) west of land parcel A-1 during construction. Aside from a brief summary in Table 7-10, little rationale is | N | The assessment of value of potential Functionally Linked Land (FLL) within and adjacent to the Site presented within **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3) has been informed by desk study and targeted bird surveys. Where SPA/Ramsar qualifying species have been recorded within relevant disturbance distances (as defined by NatureScot guidance), these |

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| | provided for the consideration of this area as functionally linked land. No assessment has been presented to consider other areas as FLL (including the order limits). Paragraph 7.8.8 states the proposal will result in a loss of foraging and roosting habitat for wintering birds within the PV area.<br><br>Paragraph 7.8.1 states that embedded measures are likely to reduce the disturbance impacts to the area of FLL to the west of land parcel A-1 to a non-significant level. At this stage, without full survey information and understanding of measures to be implemented by the CEMP, NE cannot agree with this preliminary conclusion. It is welcomed that this will be assessed as part of the HRA and NE would welcome engagement on this.<br><br>**Action:** NE advise that a clear assessment of potential functionally linked land within and adjacent to the site (within relevant disturbance distances, such as those set out by NatureScot3) should be presented in the ES.<br><br>NE advise that where any SPA birds are recorded, this area should be considered as functionally linked land. It should then be assessed for the value of this land to the relevant SPA/Ramsar site(s).<br><br>Key considerations include:<br>• Is the number of birds recorded during survey or in desk study measurable against the SPA population (i.e. 1%)? Whilst NE have generally advised a 1% threshold, this is dependent on a number of factors and cannot be considered in isolation.<br>• How regularly did this species use the area?<br>• What is the conservation status and population trend for those species within the SPA?<br>• How mobile are the species?<br>• How much alternative habitat is available?<br>• Did the birds use the site as refuge during harsh weather/high water events?<br>• Can effective mitigation be provided to ensure the relevant populations are still adequately supported? | | areas have been considered as potential FLL and assessed for their importance to the designated site populations.<br><br>The assessment has:<br>• Compared recorded numbers against relevant SPA population estimates (with reference to the 1% threshold, but not in isolation);<br>• Considered frequency and seasonality of use;<br>• Reviewed the conservation status, population trends and mobility of relevant species;<br>• Assessed the availability of alternative habitats and any evidence of use as refuge during adverse conditions.<br>• Where survey results indicate that the Site supports SPA/Ramsar species at functionally significant levels, feasible and appropriate mitigation and/or habitat safeguards has been identified and assessed to ensure the integrity of designated sites is not significantly adversely affected. |
| Natural England | **Comments on the Preliminary Assessment of Likely Significant Effects Upon Internationally Designated Sites**<br><br>**Impact pathway:** Loss/Disturbance of Functionally Linked Land (Construction & operation) – Breeding Birds<br><br>**Relevant site:** The Nene Washes SPA & Ramsar, The Wash SPA & Ramsar<br><br>**Comment:** Table 7-10 notes that the order limits are unlikely to be functionally linked to the Nene Washes SPA/Ramsar site for breeding features due to the intervening distance, low numbers of qualifying breeding birds recorded, absence of any birds recorded breeding and the limited extent of suitable habitat. | N | The Applicant notes this comment. |

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| | NE concur with this reasoning and consider the Breeding Bird populations of the designated site unlikely to be impacted by the proposals. Whilst the Wash SPA/Ramsar is not discussed here (as a result of being located outside of the ZoI for the PV Area surveyed – See NE's comment on this at paragraph 1.1 of this response), NE would advise that the site is also unlikely to be functionally linked to the Wash SPA/Ramsar for breeding features.<br><br>Action: **N/A** | | |
| Natural England | **Comments on the Preliminary Assessment of Likely Significant Effects Upon Internationally Designated Sites**<br><br>**Impact pathway:** Loss/Disturbance of Functionally Linked Land (Construction) – Otter<br><br>**Relevant site:** The Wash and North Norfolk coast SAC<br><br>**Comment:** This impact has not been considered within the PEIR. Table 7-7 states that otter are a 'qualifying feature but not a primary reason for selection'. Regardless of this, impacts must still be considered in the context of the International designation. NatureScot guidance suggests Male Otter have a range of up to 32km, as such, Otter associated with the Wash & North Norfolk Coast SAC may use habitats within or adjacent to the order limits.<br><br>It is noted that Appendix 7-6 shows records of otter along watercourses in proximity to the order limits. Table 7-10 also states 'Eighteen records of otter were returned from the data search, located on the River Welland (adjacent to Land Parcel A-1 and South Holland Main Drain (adjacent to Land Parcel D-1). A potential otter holt was noted within a spoil heap in a ditch adjacent to the western boundary of Parcel A'.<br><br>**Action:** NE advise that impacts to supporting habitat for Otter should be considered within the HRA. Whilst the intervening distance, availability of alternative habitats and sensitive design of the scheme (i.e. buffers from watercourses) are relevant factors to consider, NE recommend a review of both desk & survey information before a conclusion is drawn regarding potential impacts. | N | All available desk study and survey data has been reviewed, including the records presented in **ES Appendix 9-7: Otter and Water Vole Report** (Doc Ref. 6.3) to assess the potential role of habitats within and adjacent to the Order Limits as supporting habitat for otter populations present at the Wash & North Norfolk Coast SAC and for considering if habitats within and adjacent to the Scheme are functionally linked to the SAC.<br><br>As set out within the **OCEMP** (Doc Ref. 7.10), the Scheme would incorporate a 10m stand off from the tops of the banks of watercourses, where reasonably practicable, which would reduce the likelihood of significant effects during construction and operational phases on otter. Although, it is acknowledged that there could be some temporary disturbance to otter (not including breeding sites or resting places), it is considered that measures set out within the **OCEMP** (Doc Ref. 7.10) would reduce disturbance to a level that is not significant.<br><br>The Applicant further notes that impacts relating to supporting habitat for Otter have been considered within **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3). |
| Natural England | **Comments on the Preliminary Assessment of Likely Significant Effects Upon Internationally Designated Sites**<br><br>**Impact pathway:** Loss/Disturbance of Functionally Linked Land (Operation) - Ornithology<br><br>**Relevant site:** The Nene Washes SPA & Ramsar, The Wash SPA & Ramsar<br><br>**Comment:** As it stands, loss/disturbance to FLL is only considered during construction. This impact must also be assessed during operation. Functionally Linked Land may be directly lost as a result of both PV panels, pylons and other operational infrastructure, but can also cause the effective loss of surrounding land as a result of the 'predator shadow' cast by pylons (i.e. birds are unlikely to use land directly adjacent to a pylon). Of particular relevance are species that require large open fields and sightlines – i.e. Lapwing<br><br>**Action:** NE advise that loss/ disturbance to FLL must be considered during Operation | N | **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3) has addressed the potential impacts on FLL concerning direct (e.g. habitat loss) and indirect effects (e.g. noise and predator shadow) during all phases of the development, considering all construction, operational and decommissioning activities. |

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| Natural England | **Comments on the Preliminary Assessment of Likely Significant Effects Upon Internationally Designated Sites**<br><br>**Impact pathway:** Collision (Operation)<br><br>**Relevant site:** The Nene Washes SPA & Ramsar, The Wash SPA & Ramsar<br><br>**Comment:** NE note that Table 7-2 indicates that collision risk modelling will be undertaken for relevant species. As it stands, this modelling has not been undertaken.<br><br>Paragraph 7.8.14 identifies a potential permanent irreversible negative effect on these sites. In the absence of full analysis and detail of the embedded mitigation measures, the effect is predicted to remain significant at the local level on a precautionary basis. NE query the categorisation of the impact as 'local' due to a small proportion of the associated bird assemblage being impacted. Prior to completion of all survey works, the proportion of the associated bird assemblages affected is unknown. NE nonetheless agree that further assessment of this impact is required in the HRA.<br><br>Paragraph 7.7.4 notes potential 'embedded' mitigation of bird deterrents being installed on overhead cables 'where a significant risk of collisions is identified'. NE note that the definition of embedded may differ between the ES and HRA. Nonetheless, this measure is welcomed and NE advise that the use of bird deterrents should be driven by the survey results, collision risk modelling, and assessment of impacts to SPA species.<br><br>Paragraph 7.8.15 discusses Whooper Swan. Paragraph 7.8.15 also states, with regard to collision risk for wintering birds, that 'is it recognised that this risk cannot be mitigated in its entirety with NatureScot guidance referring to research showing that wire collision mitigation can reduce collisions for some species by 50-94%.'.<br><br>**Action:** NE would welcome consultation on any collision risk modelling & further assessment of collision.<br><br>NE advise that the use of bird deterrents should be considered at the Appropriate Assessment stage of the HRA, as these are measures being implemented specifically to avoid an adverse effect on SPA/Ramsar species.<br><br>NE advise that Whooper Swan should be considered as part of the qualifying waterbird population of the Wash SPA/Ramsar.<br><br>NE advise that the efficacy of any proposed mitigation must be considered within the HRA, including in any appropriate assessment of the impact on the integrity of the relevant designations. Where collision risk cannot be mitigated effectively, NE advise that suitable alternatives, including undergrounding of cabling, should be considered. | N | Approaches to collision risk modelling have been outlined to Natural England and advice sought on appropriate assessment methods, as summarised within Table 9-3 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1).<br><br>The use of bird diverters has been considered at the Appropriate Assessment stage. **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3), to avoid adverse effects on SPA/Ramsar species. Their geospatial need has been determined on the basis of survey evidence and the assessment of potential impacts on functionally linked land. The efficacy of bird diverters has also been assessed on a precautionary basis. On the basis of the assessment, the need for undergrounding the Grid Connection Route has not been identified.<br><br>Whooper swan has been included as part of the assemblage of the Wash SPA/Ramsar with regards to the impact assessment within **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3) and **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |
| Natural England | **Comments on the Preliminary Assessment of Likely Significant Effects Upon Internationally Designated Sites**<br><br>**Impact pathway:** Water Pollution (Construction) | N | Mitigation measures to prevent surface water pollution are provided in Table 3-7 of **Outline CEMP** (Doc Ref 7.10). An assessment of effects with the implementation of these measures is provided within **ES Appendix 9-14: HRA Report** |

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| | **Relevant site:** The Wash and North Norfolk coast SAC, The Wash SPA & Ramsar<br><br>**Comment:** This impact has not been considered within the PEIR. The Wash is hydrologically linked with the order limits. As such, construction pollution incidents could impact the site & it's interest features. Whilst NE advise that Implementation of best practise construction management measures within the CEMP (embedded mitigation) are likely to avoid impacts, this needs to be considered within the ES and HRA screening assessment<br><br>**Action:** NE advise that impacts to qualifying features caused by pollution events during construction should be considered.<br><br>Details of pollution management measures should be included in the oCEMP submitted with the ES. | | (Doc Ref. 6.3) and **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |
| Natural England | **Comments on the Preliminary Assessment of Likely Significant Effects Upon Internationally Designated Sites**<br><br>**Impact pathway:** Air Quality (Construction) – Traffic Emissions<br><br>**Relevant site:** None<br><br>**Comment:** Natural England welcome the approach taken to assessing road traffic emissions on ecological receptors. Paragraph 14.2.63 sets out the IAQM 2020 criteria for air quality impacts form traffic emissions:<br><br>- Distance screen: Designated ecological sites more than 200m from any roads for which traffic data are available were screened out from further assessment;<br><br>- Effects of the Scheme: Designated ecological sites would only be considered where the Scheme would lead to an increase in traffic of 1,000 vehicle movements (expressed as AADT flow) or 200 HDV movements, on its own or cumulatively<br><br>Table 14-2-2 states that there are no National or International sites within 200m of the Affected Road Network (ARN), with the exception of Cowbit Wash SSSI. As this SSSI is only notified for it's geological interest, Air Quality is unlikely to cause an adverse effect.<br><br>As such, further assessment has been screened out. NE concur with this approach, but would note that traffic modelling should be updated, and screening criteria re-tested, following detailed design.<br><br>**Action:** NE advise that traffic modelling should be updated following detailed design to ensure the ARN & affected sites have not changed. | N | The **Outline CTMP** (Doc Ref. 7.13) sets out the estimated peak construction traffic numbers and fixes the HGV routes to be used by the Scheme. If at detailed design stage, there is no change to the peak construction traffic numbers and the HGV routes to be used by the Scheme, it is considered that the assessment presented within the ES remains valid and that traffic modelling would not need to be updated. However, if estimated peak construction traffic numbers set out within the **Outline CTMP** (Doc Ref. 7.13) are considered to be exceeded and/ or there are changes to the HGV routes, further assessment of these changes would be undertaken. |
| Natural England | **Comments on the Preliminary Assessment of Likely Significant Effects Upon Internationally Designated Sites**<br><br>**Impact pathway:** Air Quality (Construction) – Non-Road Mobile Machinery (NRMM)<br><br>**Relevant site:** None | N | The Applicant notes this comment. |

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| | **Comment:** Emissions from NRMM are discussed in paragraphs 14.2.55-57. As there are no National or International sites within 200m of the order limits (Table 14-2-2), NE consider impacts from NRMM emissions unlikely.<br><br>**Action:** N/A | | |
| Natural England | **Comments on the Preliminary Assessment of Likely Significant Effects Upon Internationally Designated Sites**<br><br>**Impact pathway:** Air Quality (Construction) - Dust<br><br>**Relevant site:** None<br><br>**Comment:** Natural England welcome the use of the Institute of Air Quality Management (IAQM) (2024) Guidance on the Assessment of Dust from Demolition and Construction.<br><br>Paragraph 14.2.74 states that National or International designated sites have been screened in where they fall within 50m of the order limits, 50m of a route used by construction vehicles, and 250m from each access point. Whilst this approach is in line with IAQM guidance, it is always NE's advice that a 200m screening criteria is used for dust related emissions.<br><br>Regardless of the above, as there are no National or International sites within 200m of the order limits or the Affected Road Network (Table 14-2-2), NE consider impacts from dust related emissions to national and international sites to be unlikely.<br><br>**Action:** N/A | N | The Applicant notes this comment. |
| Natural England | **Comments on the Preliminary Assessment of Likely Significant Effects Upon Internationally Designated Sites**<br><br>**Impact pathway:** All Other Pathways<br><br>**Relevant site:** None<br><br>**Comment:** NE consider that impacts to Internationally Designated Sites via any other pathways are unlikely<br><br>**Action:** N/A | N | The Applicant notes this comment. |
| Natural England | **Cumulative Assessment**<br><br>Table 7-11 identifies potential cumulative effects with other projects. NE consider most key projects have been identified, with the exception of Ossian Offshore Wind Transmission. This project is at an earlier stage, but may warrant consideration in the ES.<br><br>With regards to the cumulative impacts identified, a number of the projects listed will also impact upon Functionally Linked Land during operation and construction. **The cumulative effect of all the listed projects upon the availability of suitable functionally linked land may be significant.**<br><br>It is also noted that collision risk is identified as a cumulative risk for a number of electricity transmission projects, while this may be the case, aside from Grimsby to Walpole, all other | N | Cumulative effects with other developments, including (but not limited to) Ossian Wind Farm, Grimsby to Walpole, Outer Dowsing and Weston Marsh to East Leicestershire schemes, have been assessed within **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3) and **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). This includes consideration of cumulative impacts with regards to collision risk of multiple overhead lines and impacts on functionally linked land. No likely significant cumulative effects have been identified with the implementation of mitigation |

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| | transmission projects are proposing underground cables. As such, collision risk is less likely, but impacts upon functionally linked land remain possible.<br><br>In addition, the point of connection for the project is at the proposed National Grid Marsh Substation. This substation is also likely to be utilised by a number of other energy infrastructure projects. NE would like to raise concern regarding the cumulative impact of both construction works leading to an extended period of construction around the substation area impacting functionally linked land, and via the presence of multiple overhead lines within the landscape contributing to additional collision risk to SPA birds. | | measures embedded within the DCO Application for the Scheme and mitigation measures proposed by cumulative schemes. |
| Natural England | **Nationally Designated Sites:**<br><br>Natural England have no further advice regarding both The Wash SSSI & Nene Washes SSSI. The assessment of impacts to the qualifying features of the overlapping European designations (The Wash SPA, The Wash Ramsar, The Wash and North Norfolk Coast SAC, Nene Washes SPA, Nene Washes Ramsar and Nene Washes SAC) is considered to cover any relevant impacts to the SSSI's notified features. As a result, this assessment does not need to be duplicated within the ES, although NE welcome the reference to the underpinning SSSI designations within the PEIR (Table 7-7).<br><br>PEIR paragraph 7.6.3 notes that the order limits fall within an Impact Risk Zone (IRZ) for Deeping Gravel Pits SSSI. NE concur that the proposed development does not trigger this impact risk zone, and having reviewed the PEIR, consider impacts to this SSSI from the proposals to be unlikely.<br><br>PEIR paragraph 7.6.3 also notes that a further Impact Risk Zone is triggered by the proposed development. As stated, this IRZ relates to potential Functionally Linked Land for features of the Wash and/or Nene Washes designations. Impacts to Functionally linked land have been captured for these designations (Table 7-7); no further sites or impacts pathways need to be reviewed as a result of this IRZ. | N | The Applicant notes this comment. |
| Natural England | **Nationally Designated Landscapes**<br><br>The proposed development is not located within, or within the setting of, any nationally designated landscapes. As such, NE have no specific comments to make on the further landscape implications of this proposal. We welcome the reference made to Natural England's National Character Areas, and advise that the development should avoid impact to and, where possible, enhance local distinctiveness. | N | The Applicant notes this comment. |
| Natural England | **Protected Species Licensing**<br><br>Natural England draw your attention to PINS Advice Note 11 Annex C, which sets out clearly what the Planning Inspectorate expect with regard to protected species licencing. It states that the Planning Inspectorate '*will wish to be in a position by the end of the examination to report to the Secretary of State on the likelihood of any necessary protected species licence being obtained*'.<br><br>As it stands, the PEIR has not identified the need for any protected species licences from Natural England, although it is noted that survey work is ongoing. As a result, NE have no detailed comments with regard to protected species at this stage. | N | Since statutory consultation, the Applicant has further engaged with Natural England on the requirement for a Natural England Class Licence CL31 for water voles. Compliance with the license has been considered to form part of the mitigation measures for the Scheme in Sections 9.7 and 9.8 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). Furthermore, as summarised within Table 9-3 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1), Natural England have subsequently advised that a draft |

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| | Where further work identifies the need for a protected species licence, NE recommend using our Pre-Submission Screening Service, whereby we can assess a draft licence application and provide a Letter of No Impediment (LoNI) where we consider there to be no reason that a licence would not be granted post DCO consent. Engagement through this process would be cost recovered through the DAS agreement(s) already in place. | | water vole license application is not required for submission with the DCO Application. |
| Natural England | **Soils and Best & Most Versatile Agricultural Land**<br><br>Soil is a finite resource which plays an essential role within sustainable ecosystems, performing an array of functions supporting a range of ecosystem services, including storage of carbon, the infiltration and transport of water, nutrient cycling, and provision of food. To safeguard soil resources as part of the overall sustainability of the development, it is important that the soil resource is able to retain as many of its important functions as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration on how any adverse impacts on soils can be avoided or minimised. Any actions which compromise options for the future use of the land, or which undermine its inherent capability should be avoided. | N | The detailed ALC survey results have informed the preparation of the **OSMP** (Doc Ref. 7.14) submitted with the DCO Application. |
| Natural England | **Soils and Best & Most Versatile Agricultural Land**<br><br><u>ALC Survey Methods</u><br><br>To date, a reconnaissance ALC survey has been undertaken across the PV area at an average density of around 1 sample per 6 hectares. It is noted at paragraph 9.4.6 that the methodology for further ALC survey is being discussed with NE. It is Natural England's advice that ideally a full detailed ALC survey would have been carried out across the full order limits, however, NE have engaged with the applicant through DAS and set out proposed changes to the ALC survey approach we consider suitable in this circumstance. This was been set out in our DAS advice dated April 2024. Key points set out below:<br><br>• *'It is agreed an ALC survey is undertaken within the Solar PV Areas, with flexibilities around density depending on land quality identified in the semi detailed ALC survey and Predictive ALC Mapping report. In the circumstances,* ***a semi detailed survey (1 auger per 2 ha plus representative pits) is acceptable where the site is clearly expected to be non-BMV, but where BMV has been identified, a detailed ALC survey (1 auger per 1 ha plus representative pits) would be expected. We would also require a detailed ALC survey density for any proposed permanent infrastructure (i.e. substation)****'* | N | Detailed ALC survey across the Solar Development Area is presented within **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3). One auger per one hectare survey intensity was used across the Solar Development Areas, with the exception of the survey of the proposed habitat management area (refer to **ES Figure 2-2** (Doc Ref. 6.2)), where the survey intensity, outside the area of the Scheduled Monument, was reduced to one auger per two hectares. This was because this area is proposed to be retained in arable use with skylark plots, with no physical infrastructure proposed in this area.<br><br>Areas of Scheduled Monuments (within Parcels B and C) and areas where World War II aircraft crash sites have been recorded (within Land Parcels A and D) were left unsurveyed to avoid impacts from ground disturbance on these sites.<br><br>A small number of fields also had restricted access due to existing crops and use as horse paddocks, which were left unsurveyed as a result. The locations of auger points and areas surveyed are mapped in detail within **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3). |
| Natural England | **Soils and Best & Most Versatile Agricultural Land**<br><br><u>ALC Survey Methods</u><br><br>It is acknowledged that the BESS and other foundational infrastructure are not permanent (i.e. will be removed following decommissioning after 40 years), however, due to the soil handling and | Y | Siting of infrastructure within the Scheme layout has considered a full suite of environmental constraints, including ALC grades. The mitigation hierarchy has been applied by considering opportunities to avoid higher grade soils for activities which may have permanent impacts on soils, where practicable. However, as |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | reinstatement requirements of these works, there is the potential to cause significant permanent damage and degradation of the ALC resource where soil management & reinstatement is not undertaken to high standards. As a result, **NE advise that any works involving soil handling and reinstatement are micro-sited away from BMV land, or the highest grade BMV land, wherever possible.** The commitment to avoidance is welcomed at paragraph 9.7.1<br><br>Paragraph 9.4.7 discusses the ALC survey approach to the Grid Connection Corridor and Inter Array Areas. It is stated that *'ALC is not a differentiating factor in the development of the routeing for this Scheme'*. **Natural England strongly disagree with this statement and consider it in contravention of NPS EN-1 paragraph 5.11.12**: *'Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5)'*. Whilst it is noted that there are a number of constraints to consider, ALC grade must be factored into the routeing of the scheme. | | the potential for the Scheme to result in permanent impacts on soils is limited (refer to Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) ) and large areas of the Site comprise BMV agricultural land, it has not been possible to avoid the use of BMV land for works involving soil handling in all instances. Where BMV land could not be avoided, impacts will be mitigated through the soil management measures set out within the **OSMP** (Doc Ref. 7.14). Further information is provided within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). |
| Natural England | **Soils and Best & Most Versatile Agricultural Land**<br><br><u>ALC Survey Methods</u><br><br>Through engagement via DAS, rationale has been provided for this approach not to consider ALC a differentiating factor in routeing of the grid connection & inter array areas, including that: as provisional ALC mapping indicates the full site lies within ALC grade 1 and 2 land, it's unlikely to be possible to avoid BMV land. Figure 9-2 illustrates the estimated ALC grades across most of the PV area, informed by the Reconnaissance ALC survey. When compared to Figure 9-1 (Provisional ALC Mapping), it is clear that the ALC grades mapped by the recon survey fluctuated significantly compared to the provisional grading of grade 1 or 2 across the full order limits, with some areas of non-BMV land being identified.<br><br>This illustrates the significant uncertainty around the provisional mapping and may indicate that the ALC grading of land along the cable route is not entirely Grade 1 & 2 as indicated by the provisional mapping. As a result, **Natural England continue to request that ALC survey of the Grid Connection Corridor and Inter Array Areas should be carried out pre-consent, primarily to inform micro-siting of pylons, construction compounds & other potentially damaging activities away from BMV land, or the highest grade BMV land, wherever possible.**<br><br>Alongside the ALC survey, **NE always recommend additional soil testing, i.e. pH, nutrient testing, should be undertaken** as it can help to inform the best use of the soil resource on site, including where BMV soils cannot be avoided but are proposed to be re-used elsewhere on-site. For example, guiding the siting of certain habitat enhancements, management practises. | N | Natural England's position regarding the need to minimise impacts on BMV land is acknowledged and the Applicant recognises that the ALC grade of the land is a relevant consideration. However, in the specific context of this Scheme, the influence of ALC grade on both the alignment and micro-siting of the Inter-Array Connections and Grid Connection Route is inherently constrained.<br><br>A detailed soil survey of the Inter-Array Connections and the Grid Connection Route is proposed post-DCO consent. This strategy is consistent with accepted approaches on comparable Nationally Significant Infrastructure Projects (NSIPs), such as the Tillbridge Solar Project, Sunnica Energy Farm and Yorkshire GREEN.<br><br>Laboratory testing of soils across the Solar Development Area has been undertaken, with results provided within **ES Appendices 5-2 Agricultural Land Survey – Parcels A&D (Doc Ref 6.3)** and **ES Appendix 5-3: Agricultural Land Survey – Parcels B&C (Doc Ref. 6.3).** |
| Natural England | **Soils and Best & Most Versatile Agricultural Land**<br><br><u>Assessment of Impacts to BMV land</u> | N | The detailed ALC surveys for the Solar Development Area are presented within **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3), with updated results summarised within Section 5.6 **of ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1). These results supersede the preliminary assessment results presented in the PEIR. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | Natural England welcome the use of the assessment methodology set out in IEMA's 'A New Perspective on Land and Soil in Environmental Impact Assessment (2022)' and consider the sensitivity and magnitude attributed to ALC grades are suitable, as set out in Tables 9-5 & 9-6, respectively.<br><br>Due to the absence of full ALC survey data, no firm evaluation of the amount of BMV land across the order limits has been presented.<br><br>• A summary of potential BMV land in the PV areas based on the reconnaissance ALC survey is set out at table 9-8: **704ha of land is categorised as 'Mix of Subgrade 3a and 3b' or above in the PV areas**, with 242ha categorised as 'mainly Subgrade 3b'.<br><br>• Paragraph 9.8.21 states **that 422.7ha (70.7%) of the PV area is considered BMV** and 174.8ha (28.3%) of the PV area is considered non-BMV.<br><br>o It is noted that the Areas presented in Table 9-8 do not match those discussed in paragraph 9.8.21. It is assumed this is due to amendments to the Order Limits since the reconnaissance ALC survey was completed. **NE request clarity on this.**<br><br>• In the absence of any ALC survey data for the Grid Connection Corridor & Inter Array Areas, no data is presented regarding the area or ALC grade of these areas. It is noted that these areas are all mapped provisionally as Grade 1 and 2. Paragraph 9.8.14 states that the areas of land anticipated to be impacted by the Grid Connection Corridor is likely to exceed 50ha. | | Natural England's position regarding the need to minimise impacts on BMV land is acknowledged, and the Applicant recognises that the ALC grade of the land is a relevant consideration. However, in the specific context of this Scheme, the influence of ALC grade on both the alignment and micro-siting of the Inter-Array Connections and Grid Connection Route is inherently constrained.<br><br>A detailed soil survey of the Inter-Array Connections and the Grid Connection Route is proposed post-DCO consent.<br><br>This strategy is consistent with accepted approaches on comparable Nationally Significant Infrastructure Projects (NSIPs), including the Tillbridge Solar Project, Sunnica Energy Farm and Yorkshire GREEN. |
| Natural England | **Soils and Best & Most Versatile Agricultural Land**<br><br>Assessment of Impacts to BMV land<br><br>**When the ALC dataset is complete, this should be clearly presented in the ES including a breakdown of the land take (and the proportion/amount of BMV land) for each element of the development, including Solar PV, mitigation/enhancement areas, retained agricultural land, substations/BESS infrastructure, construction compounds, cable routes and access tracks**. This will inform the Planning Inspectorate's consideration of the overall impact of the proposal on agricultural land quality and soils. The implications of each element of the proposal on agricultural land quality and soil health may differ; this should be accounted for and addressed within the SMP too.<br><br>**It is important to consider the impact of ecological enhancements/mitigation areas on BMV land.** Whilst most ecological enhancements, such as grassland creation, are reversible and retain the long term potential of the land, areas of woodland planting, or other irreversible land use changes must be considered to have a permanent impact upon the soil resource. Consideration must be given to the siting of ecological enhancements during detailed design.<br><br>Table 9-12 summarises the provisional assessment, which shows significant adverse effects from the temporary loss of BMV land during construction and operation. **As this assessment is based on provisional data, it must be updated in the ES. Any significant adverse effect must also clearly** | Y | Tables with areas of land in each BMV classification to be temporarily or permanently lost as a result of the Scheme are provided within Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1), alongside an assessment of the significance of the effect. The assessment has subsequently informed the measures incorporated within the **Outline Soil Management Plan** (Doc Ref. 7.14).<br><br>Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) presents the assessment of impacts from all Scheme's land uses, including habitat management areas. No woodland blocks have been proposed as part of the outline landscape masterplan, as set out within the **OLEMP** (Doc Ref. 7.16) to minimise permanent impacts on BMV land. However, permanent impacts from the establishment of scattered trees along field boundaries have been considered.<br><br>An updated assessment, considering the detailed ALC survey results, has been provided within Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1). Siting of infrastructure within the Scheme layout has considered a full suite of |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | **demonstrate that the mitigation hierarchy has been followed, to avoid first, then consider mitigation (i.e. soil management & reinstatement).** | | environmental constraints, including ALC grades. The mitigation hierarchy has been applied by considering opportunities to avoid higher grade soils, where practicable. However, as the potential for the Scheme to result in permanent impacts on soils is limited (refer to Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1)) and large areas of the Site comprise BMV agricultural land, it has not been possible to avoid the use of BMV land in all instances. Where BMV land could not be avoided, impacts would be mitigated through the soil management measures set out within the **Outline Soil Management Plan** (Doc Ref. 7.14). Further information regarding the site selection process is provided within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). |
| Natural England | **Soils and Best & Most Versatile Agricultural Land**<br><br><u>Soil Management</u><br><br>Natural England's advice is that development on BMV land can be acceptable only where the long term potential of best and most versatile land is safeguarded. As such, the intention to provide an outline Soil Management Plan (oSMP) with the ES is welcomed. The detail of this plan is key to safeguarding the soil resource across the development site.<br><br>**The SMP must cover the full site boundary**, and should incorporate any works that involve soil handling or other activities which may impact the soil, including during any 'pre-commencement' activities.<br><br>**The SMP should detail the involvement of a suitably qualified soil specialist** during the construction, operation and decommissioning phases of the development.<br><br>The PEIR notes that timing of works will avoid working when soils are wet. It is NEs advice that **all soils should only be handled in a dry and friable condition**, and it is expected that construction programmes would restrict soil handling to the drier summer period to minimise risk of soil damage (April through September) as far as reasonably practicable. This would minimise the possibility for on-site delays due to rainfall in the winter period, as well as the need to recondition soils, which requires additional space and time. Where this is not possible, clear additional management measures should be outlined, in line with DEFRA guidance. This is particularly important for land to be restored to agricultural use.<br><br>The SMP should follow DEFRA's Code of practice for the sustainable use of soils on construction sites - GOV.UK. | N | The **Outline Soil Management Plan (OSMP)** (Doc Ref. 7.14) applies to the entirety of the Site within the Order Limits and for all activities which may impact the soil.<br><br>The **OSMP** (Doc Ref. 7.14) requires the involvement of a suitably qualified soil specialist during the construction, operation and decommissioning phases of the Scheme.<br><br>The **OSMP** (Doc Ref. 7.14) sets out that soil handling should be avoided when the moisture content is above the plastic limit, which is more likely between October and March so should be considered when scheduling the construction works. Soil handing would be undertaken in accordance with the Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites[7], as set out within the **OSMP** (Doc Ref. 7.14). |

[7] Department for Environment, Food and Rural Affairs (2008). Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Natural England | **Soils and Best & Most Versatile Agricultural Land**<br><br>Time Limit and Reinstatement<br><br>It is noted that the proposed development has a proposed lifespan of 40 years. This time limit is welcomed; NE advise this 40 year time limit must be secured within the DCO.<br><br>Natural England also welcome the commitment that *'land used temporarily during the construction, operational and decommissioning phases will be restored following decommissioning of the Scheme, where practicable, to its previous condition and use, subject to agreement with the relevant landowner. A photographic and descriptive record of condition will be documented for the working areas to enable comparison following reinstatement to ensure land meets the necessary condition previously recorded'*. **NE advise that this commitment should be clearly set out in the DCO and/or control documents (i.e. SMP)** to secure the reinstatement of land to it's original ALC grade. Without this commitment the temporary nature of impacts to the ALC resource remains uncertain. **NE advise that the ALC survey results must be used within the SMP to inform reinstatement.** | N | In accordance with Requirement 21 of the **Draft DCO** (Doc Ref. 3.1), the operation of the Scheme would be time limited to 40 years and would need to be decommissioned 40 years after the date of final commissioning. The **OSMP** (Doc Ref. 7.14), submitted with the DCO Application, sets out that decommissioning will aim to restore all agricultural land without any degradation of the current ALC grade, as informed by the detailed ALC survey. Any minor variability from the current ALC grading identified in any post restoration surveys should be acknowledged and an assessment made as to whether this could be justified (on a case-by-case basis) as a result of professional judgement. It is considered that if the measures prescribed in the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites[7] and the Good Practice Guide for Handling Soils in Mineral Workings 2021**Error! Bookmark not defined.** are followed that successful restoration should be achieved. |
| Natural England | **Biodiversity Net Gain**<br><br>As it stands, no Biodiversity Net Gain calculations have been provided. The PEIR recognises the government's intention to mandate a minimum of 10% Biodiversity Net Gain for NSIPs from November 2025 and from discussions with the applicant via DAS, we understand that a commitment will be made within the DCO to deliver this.<br><br>The enhancement measures outlined at PEIR paragraph 7.9.3 are welcomed, along with the intention to ensure they are multi-functional. Enhancement to achieve Biodiversity Net Gain can connect people with nature. For example, via enhancement of habitats along Public Rights of Way. Including interpretation boards along Public Rights of Way with views over the PV & enhancement areas can help to improve public understanding of the project and its impact on the environment too. | N | A Biodiversity Net Gain Assessment is provided within **Biodiversity Net Gain Report** (Doc Ref. 7.9). The **Draft DCO** (Doc Ref. 3.1) Schedule 2 Requirement 8 includes a commitment for the Scheme to achieve BNG in accordance with the **BNG Report** (Doc Ref. 7.9) and the **OLEMP** (Doc Ref. 7.16).<br><br>A permissive path would be provided connecting PRoWs between Queens Bank and Shepeau Stow, following the boundary of the Settlement W of Cate's Cove Corner Scheduled Monument, which forms part of a habitat management area within the Scheme design. The corridor also includes space for landscaping and for the provision of information boards on the historic and natural environment. |
| Natural England | **Ancient Woodland and Ancient/ Veteran Trees**<br><br>It is noted that there will be no direct loss to Ancient Woodland or Ancient and Veteran Trees as a result of the development. As a result, NE have no specific comment to make in this regard and refer to our Standing Advice for Ancient Woodland, Ancient Trees and Veteran trees. | N | The Applicant notes this comment. |
| Natural England | **Connecting People with Nature**<br><br>Natural England's Access to Greenspace Standards, available via the NE Green Infrastructure mapping tool, indicate that despite the rural location, there is very little provision of accessible greenspace within and around the project area. The provision of additional permissive footpaths could help to increase permeability across the landscape, and connect some of the small settlements in proximity to | N | As stated in **ES Chapter 2: The Scheme** (Doc Ref. 6.1) a permissive path will be provided connecting PRoWs between Queens Bank and Shepeau Stow, following the boundary of the Settlement W of Cate's Cove Corner Scheduled Monument, which forms part of a habitat management area within the Scheme design. The corridor also includes space for landscaping |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | the project. Natural England's GI framework, standards and process journeys may be useful here: Quick Start Guide. | | and for the provision of information boards on the historic and natural environment. |
| Natural England | **Comments on the Breeding Bird Survey Report (Appendix 7-2)**<br>**Document Ref:** Table 2.1<br>**Comment:** It is noted that no nocturnal survey has been undertaken for breeding birds. Nocturnal birds such as owl and nocturnally displaying species such as quail or snipe may have been missed.<br>**Action:** This should be noted as a limitation of the survey effort. | N | Nocturnal bird surveys (e.g. for owl, quail or snipe) are not routinely required under current guidance and are only considered necessary where habitats within the Site are suitable and where there is a realistic potential for significant adverse effects. The habitats within the Order Limits are not considered optimal for nocturnal or nocturnally displaying species, with limited availability of key features such as extensive rough grassland, marshy habitats or mature woodland edge typically associated with these species, it is considered unlikely that there would be a significant adverse effect. As such, it is considered that nocturnal bird surveys would be disproportionate. This has been noted as a limitation within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |
| Natural England | **Comments on the Breeding Bird Survey Report (Appendix 7-2)**<br>**Document Ref:** 2.1 & 2.16 – Desk Study<br>**Comment:** The desk study provided for breeding bird species appears limited.<br>The westernmost PV Area is located adjacent to Crowland Wash, where avocet, a Schedule 1 species, have been known to breed. The desk study has not identified this potential sensitivity.<br>**Action:** It is important that a desk study for breeding bird survey is undertaken. This is especially important for breeding crane. As discussed via DAS, the Lincolnshire Wildlife Trust are a key contact for desk based information, particularly any records between Willow Tree Fen Reserve and the project.<br>The ES should consider potential disturbance to Avocet breeding at Crowland Wash. | N | Relevant stakeholders, including the Lincolnshire Wildlife Trust, BTO and RSPB have been approached to request relevant data to inform the assessment, as set out within Table 9-3 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). Data on common crane has been received from Lincolnshire Wildlife Trust and this has been used to inform the ES. Disturbance of notable breeding species such as avocet has been taken into account in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) and **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3). |
| Natural England | **Comments on the Breeding Bird Survey Report (Appendix 7-2)**<br>**Document Ref:** Table 2.2<br>**Comment:** The CIEEM EIA Guidelines (2018) state: "When determining the importance of a species population, contextual information about distribution and abundance is fundamental, including trends based on historical records. For example, a species could be considered particularly important if it is rare and it's population is in decline". This may be particularly relevant for species such as turtle dove<br>**Action:** Expand the definition of County importance to include consideration of rarity and population trend. | N | The assessment of importance of species found during surveys and identified during the desk study has considered rareness and population status when assigning levels of importance, as set out within Section 9.4 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |
| Natural England | **Comments on the Breeding Bird Survey Report (Appendix 7-2)**<br>**Document Ref:** 2.4 – Field Survey | N | When assessing potential impacts on breeding birds, the location and scale of distinct habitats, landscape features and microhabitats within larger scale habitat categories have been |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | **Comment:** The site is described as 'relatively homogenous arable habitat', however wetland species and scrub are recorded during field survey.<br><br>**Action:** It would be valuable to the assessment of impacts to breeding birds to consider which transects had wetland habitats and what form that wetland took, those with scrub or really good tall/ thick hedgerows etc. | | used to inform the assessment presented within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). |
| Natural England | **Comments on the Breeding Bird Survey Report (Appendix 7-2)**<br><br>**Document Ref:** 4.2 – Overview<br><br>**Comment:** It is acknowledged that most of the species recorded are typical for the habitats described. Nonetheless, a single transect that records hobby, lapwing, turtle dove and yellow wagtail is not typical (Transect 1).<br><br>**Action:** It is recommended that the ES assesses the survey results considering the separate zones in order to pick up those areas that are of particular importance to birds across the site. | N | The majority of species recorded are consistent with the habitats present; however, the assemblage of hobby, lapwing, turtle dove and yellow wagtail associated with Transect 1 is atypical and indicates a zone of differential ecological value. The assessment presented within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) has considered potential impacts on, and importance of habitats for, the bird species identified; through analysis of survey results at the zonal level to identify areas of particular importance for the species recorded. |
| Natural England | **Comments on the Breeding Bird Survey Report (Appendix 7-2)**<br><br>**Document Ref:** PEIR para 7.8.6<br><br>**Comment:** A capacity for displacement is mentioned for Skylark.<br><br>**Action:** NE query whether the applicant is able to reference the statement regarding the capacity for displacement of skylark.<br><br>Consideration should be given to establishing measures that increase the carrying capacity for skylark locally to allow for balance for the territories (possibly over 100) that could be lost. | N | Due to the poor suitability of solar arrays for nesting skylarks, it is inevitable that territories will be displaced from these areas up to the capacity of adjacent habitats.<br><br>Section 9.7 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) provides an overview of the areas to be enhanced for ground-nesting birds, such as skylark, within the Solar Development Area. **Works Plans** (Doc Ref. 2.3) secure the location and extent of dedicated Habitat Management Areas within the Solar Development Area, with further information on the purposes of each of these areas provided within the **OLEMP** (Doc Ref. 7.16). The Habitat Management Areas extend over 170ha of land, out of which over 150ha is set aside for improving habitats for ground-nesting birds, such as skylark.<br><br>As set out within the **OLEMP** (Doc Ref. 7.16), the Farmland Bird Mitigation Strategy would provide management principles for the establishment of skylark plots within the allocated Habitat Management Areas, Requirements for monitoring and adaptive management are also set out. |
| Natural England | **Comments on the Breeding Bird Survey Report (Appendix 7-2)**<br><br>**Document Ref:** PEIR para 7.8.7<br><br>**Comment:** Disturbance to breeding birds during construction is discussed. | N | The risk of birds attempting to nest on construction vehicles, plant or temporary structures has been considered. Measures such as daily pre-use checks during the breeding bird season and removal of potential nesting material before establishment have been incorporated within the **OCEMP** (Doc Ref. 7.10) as |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | **Action:** Please also consider measures relating to the potential for breeding birds to nest on construction related vehicles/ plant/ temporary structures and how this will be prevented to avoid associated delays. | | proportionate safeguards to ensure legal compliance and to avoid programme delays. |

## 2.16. National Gas Transmission

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| National Gas Transmission | Thank you for your letter.<br>Regarding DCO EN010169 - Meridian Solar Farm there are no National Gas assets affected in this area.<br>If you would like to view if there are any other affected assets in this area, please raise an enquiry with www.lsbud.co.uk<br>Additionally, if the location or works type changes, please raise an enquiry.<br>Please note this response is only in reference to National Gas Transmission assets only. | N | The Applicant notes this comment. |

## 2.17. National Highways

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| National Highways - Property Enquiries | Having researched the area in question on our mapping system, I can advise that National Highways does not show as owning or having any interest in the land in question. Please see below screenshot from our mapping system, with land highlighted red showing as registered to a private third party; if NH owned any of the land it would be highlighted blue. | N | The Applicant notes this comment. |
| National Highways | **National Highways Considerations**<br>**Access**<br>Access to the development is proposed to be taken from local roads. As these roads are part of the local road network managed and operated by Lincolnshire County Council, National Highways has no comments to make about the proposed access. | N | The Applicant notes this comment. |
| National Highways | **Boundary Matters**<br>The nearest point of impact on the Strategic Road Network (SRN) will be the A47/A16 junction and the A1/A6121 junction approximately 12km south and 26km west, respectively of the Solar PV Area Boundary. The site does not share a common boundary with the SRN therefore we have no boundary related comments. | N | The Applicant notes this comment. |
| National Highways | **Assessment Methodology (Section 13.6)**<br>We acknowledge Paragraph 13.10.9 stating that the construction baseline peak hour traffic flows are from 06:00 to 07:00 AM and 07:00 to 08:00 PM. We note that these fall outside of the SRN AM (08:00-09:00) and PM (17:00-18:00) peak hours.<br>Table 13-20 identifies the network AM and PM peaks as 07:00 to 08:00 and 19:00 to 20:00, respectively. We would welcome further clarification on the rationale for selecting these time periods. For the assessment of traffic impacts on the SRN, National Highways expects network peak hours to be between 08:00 to 09:00 AM and 17:00 to 18:00 PM.<br>Table 13-20 identifies the construction PM Peak to be between 16:00-17:00, however paragraph 13.10.9 states the construction PM Peak to be 19:00 to 20:00, for clarity and consistency we recommend this discrepancy in the Construction PM peak is clarified / corrected.<br>We understand that the construction phase is between 2027 and 2030, and 2029 is the assumed peak year for construction traffic movement and will be used as the future assessment year to provide a worst-case assessment. | N | **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) sets out the Scheme peak hour as well as the network peak hour assessment (based on baseline data collected in September 2025). It should be noted that the local network peak has a different peak than the Strategic Road Network (SRN) due to the rural nature of the Scheme. The nearest SRN junction from the Scheme is located approximately 8 km away.<br>Section 15.5 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) sets out the details of the construction period, which is now expected to occur between 2029 and 2033 with peak construction traffic expected to occur in 2031 for the purposes of the ES. It is considered unlikely that new or materially different effects would arise if construction and operation started later than this date. Details on the duration of the construction programme are provided in **ES Chapter 2: The Scheme** (Doc. Ref. 6.1). **ES Chapter 4: Overview of the EIA Process** (Doc Ref. 6.1) provides further information on the consideration of the implications of assessment years changing. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| National Highways | **Future Baseline (Section 13.8)**<br>TEMPro has been used to derive traffic growth factors. Based on our independent review, the growth factors presented in Table 13-17 do not match the TEMPro outputs for the five locations in Paragraph 13.8.38. Please could you provide the methodology used to extract the growth factors in Table 13-17. | N | Section 15.6 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) outlines the TemPRO growth rates which have been updated since the PEIR to provide robust rates for the peak construction year of 2031. These factors were agreed with LHAs and NH during the meeting in September 2025. |
| National Highways | **Construction Trip Generation (Section 13.10)**<br>We acknowledge that the construction trip generation is estimated based on proxy sites and expected requirements for the scheme.<br>During construction, a daily 400 HGV movements and 570 construction workers have been identified.<br>National Highways welcomes the commitment by the applicant to ensure deliveries to the site are managed outside of peak network hours, thus minimising the impact on the A1 and the A47 as stated in Paragraph 13.9.4. However, we note that HGV deliveries will be restricted to 08.00-16.00 with some HGV deliveries taking place during the network AM peak hour of 08.00-09.00 which will have an impact on the SRN.<br>We understand that a Delivery Management System will be implemented to regulate HGV deliveries and compliance of HGV routing as stated in Paragraph 13.9.4. However, to understand the proposed impact to the SRN, we welcome further information on the likely number of vehicles arriving/departing the site between 08:00-09:00 during the peak of the construction period as a worse-case scenario.<br>We recognise that construction staff will work 12-hour shifts (Monday to Friday from 07:00-19:00).<br>We acknowledge Paragraph 13.10.7 stating that 95% of workers would travel by private vehicle. National Highways welcomes initiatives such as shuttle services provision to encourage the use of sustainable transport modes to minimise the impacts of travel. | N | The **Outline CTMP** (Doc. Ref. 7.13) sets out the construction trips generation associated with the whole extent of the Scheme. HGV movements associated with the construction phase are expected to be managed across an 8-hour window outside of the SRN network peaks (08:00 – 09:00 and 17:00 – 18:00), however it is expected some HGV trips will be required in the local network peak of 16:00 – 17:00.<br>Peak daily traffic numbers for the Scheme are outlined in section 15.8 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1).<br>Details on construction staff working hours are provided in section 15.5 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1).<br>The **Outline CTMP** (Doc. Ref. 7.13) sets out updated assumptions associated with construction staff, 45% of staff are expected to travel by private vehicle, whilst 55% of staff are expected to travel in via Shuttle service provision – updated assumptions had been discussed with LHAs during the meeting in September 2025. |
| National Highways | **General Guidance**<br>We acknowledge that you will prepare a Transport Assessment (TA), Construction Traffic Management Plan (CTMP) and Environmental Statement (ES) in support of the forthcoming planning application and look forward to receiving these for review. | N | An **Outline CTMP** (Doc. Ref. 7.13) and **ES Chapter 15: Traffic and Access (**Doc Ref. 6.1) have been prepared with the DCO Application. As agreed in the scoping meeting with LHAs and NH in September 2025, a Transport Assessment Note (TAN) has been prepared in place of a full TA and is included as **ES Appendix 15-4** (Doc. Ref. 6.3). |
| National Highways | **Transport Assessment**<br>Due to the scale and nature of the proposed development, traffic generated from the proposed development is likely to have an impact on the SRN, in particular the A47 trunk road. As such, National Highways would expect to be consulted on the Transport Assessment which would form a key submission of any forthcoming planning application.<br>We recommend that the Transport Assessment is undertaken in a staged approach with the contents and methodology scoped out with National Highways and Lincolnshire County Council in advance. However, as a starting point, we would suggest that the Transport Assessment be prepared in | N | As noted above, during the Transport scoping meeting (September 2025) it was agreed with LCC, PCC and NH that the Applicant would produce a TAN instead of a full TA in order to reduce duplication of information across a number of transport deliverables which support **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1).<br>The TAN is compliant with Planning Practice Guidance on Travel Plans, Transport Assessments and Statements (March, 2014) and |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | accordance with Planning Practice Guidance on Travel Plans, Transport Assessments and Statements (March, 2014).<br><br>In addition, due to the proximity of the site to the SRN, the Transport Assessment should be produced in accordance with DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development. | | the DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development. |
| National Highways | **Transport Assessment**<br><br>In particular, the Transport Assessment may need to include the following to satisfy National Highways:<br><br>1. Development proposal details– information about the scale of the proposed development including any phasing, parking, access points, hours/days of operation (for employment uses), timescales for the construction period, and anticipated year of opening.<br>2. Trip generation – information about the anticipated levels of traffic the development would generate. This should include a breakdown of trips generated for the different land uses within the development site. The data should include an hourly breakdown with a separate breakdown for the SRN peak hours. These are often 08:00-09:00 (AM peak hour) and 17:00-18:00 (PM peak hour). However, the applicant may need to demonstrate that these are the true network peaks in this location.<br>3. Trip assignment – information about traffic routings in relation to the SRN. This should be presented in absolute numbers and percentages.<br>4. Depending on the scale and distribution of new trips, it may also be necessary to indicate how traffic associated with the development proposal will impact on the SRN in the peak hours. These impacts should be considered for the site both as a standalone operation, and cumulatively with any wider committed developments. This is necessary to consider whether the development will result in material implications for SRN junctions.<br>5. Where further assessments are deemed necessary, these should be carried out for the development based on the year of opening. This is the opening year assessment and is to comply with DfT Circular 01/2022. Where the development is to be brought forward in phases, an opening year assessment for each phase will be required.<br><br>As previously mentioned, we recommend the above assessment work is agreed in a staged approach with the first stage being to agree the trip generation and trip distribution of the various elements of the proposal. This will determine if any further assessments with respect of the SRN are required and the how these should be undertaken. | N | Details on the Scheme can be found in **ES Chapter 2: The Scheme** (Doc. Ref. 6.1). The trip generation, trip distribution and traffic routing pertaining to the Scheme are discussed in section 15.8 of this chapter of the ES. The HGV, AIL and Staff trip routing are also shown in **ES Figures 15-3, 15-4 and 15-5** (Doc. Ref. 6.2).<br><br>The Scheme is not expected to generate any impact on the SRN in the SRN AM or PM peak hours identified in the comment (08:00 – 09:00 and 17:00 – 18:00) as all trips to and from the site are expected to occur outside of these hours. |
| National Highways | **Construction traffic management plan (CTMP)**<br><br>We understand that a Construction Traffic Management Plan (CTMP) will be prepared to support this application. The CTMP should identify the period(s) during which construction activities will take place, the number of trips likely or be generated, the types of vehicles involved, and, for heavy construction | N | The **Outline CTMP** (Doc. Ref. 7.13) sets out details regarding abnormal loads, hours of working, access arrangements and compliance and enforcement measures. An information pack containing details on site contact information and complain |

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| | traffic, an appropriate diversion route or traffic management plan to minimise local impacts. We welcome further information on the routing, timing and management of any special or abnormal deliveries or vehicular movements, as stated in Paragraph 13.10.5. | | procedures will be issued to all contractors once they have been confirmed. |
| National Highways | **Construction traffic management plan (CTMP)**<br>The CTMP should include, but is not limited to, the following details:<br>1. Hours of working, date works will commence and anticipated completion date/duration.<br>2. Anticipated average two-way daily traffic numbers associated with the construction phase of the project.<br>3. Confirmation of the intended construction access arrangements to and from the site from the SRN (A47).<br>4. The arrangements for routing of construction vehicles to and from the site.<br>5. Details of any special or abnormal deliveries or vehicular movements.<br>6. Site Contact Details responsible for ensuring Health & Safety and handling of Complaints.<br>With respect of a CTMP however, National Highways is content that the above can be undertaken post-planning consent ensured through a suitably worded planning condition.<br>We hope that the above information is useful with respect of this pre-application consultation. If I can be of any further assistance on this matter, please do not hesitate in contacting me directly. | N | The **Outline CTMP** (Doc. Ref. 7.13) sets out details regarding abnormal loads, hours of working, access arrangements and compliance and enforcement measures. An information pack containing details on site contact information and complain procedures will be issued to all contractors once they have been confirmed. |

## 2.18. National Grid Electricity Transmission PLC

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| National Grid Electricity Transmission PLC | Due to the proximity of some of our existing or future assets, NGET wishes to express their interest in further consultation while the impact on our assets is still being assessed.<br><br>Where the Promoter intends to acquire land, extinguish rights, or interfere with or work within close proximity to any of NGET's apparatus and land, this will require appropriate protection and further discussion on the impact to its apparatus and rights.<br><br>NGET assets form an essential part of the electricity transmission network in England and Wales. Please continue to consult NGET in regards to this development.<br><br>NGET will require an adequate form of Protective Provisions included within the Order. | N | The Applicant notes this comment.<br><br>The **Draft DCO** (Doc Ref. 3.1) includes standard protective provisions for electricity undertakers whose apparatus may be affected by the Scheme. In addition, the Applicant is engaging with NGET to agree bespoke protective provisions to appropriately protect NGET's assets and rights.<br><br>The Applicant will continue to engage with NGET regarding their assets following submission of the DCO Application, to ensure that disruption is minimised as far as reasonably practicable. |
| National Grid Electricity Transmission PLC | **New Infrastructure**<br><br>Please refer to the Holistic Network Design (HND) and the National Grid ESO website to view the strategic vision for the UK's ever growing electricity transmission network. https://www.nationalgrideso.com/future-energy/the-pathway-2030-holistic-network-design/hnd'<br><br>**Proposed New Onshore Infrastructure**<br><br>The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects.<br><br>The NGET projects set out in the sections below are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed. | N | The Applicant welcomes the Great Grid Upgrade, and all works to facilitate more clean, secure energy on the UK system, and recognise the importance of these works in connecting new sources of generation away from the typical generators of the past decades, such as coal and gas fired power stations.<br><br>The Applicant has been working collaboratively with NGET over the last 3 years to ensure projects and reinforcements to the network are undertaken in as joined up a manner as possible with those new generating stations driving the new network forwards. |
| National Grid Electricity Transmission PLC | **Grimsby to Walpole**<br><br>The Grimsby to Walpole project is critical national infrastructure and involves the construction of approximately 140 km of new overhead transmission lines from Grimsby to Walpole, associated new substations, and other associated required works. It is defined as a Nationally Significant Infrastructure Project (NSIP) for planning purposes and therefore a Development Consent Order (DCO) is being progressed. The project completed Stage 1 (non-statutory) consultation in March 2024 and is currently scheduled to launch the Stage 2 (statutory) consultation in June 2025.<br><br>The Grimsby to Walpole project has been identified as one of a number of network upgrades that need to be accelerated to help meet increased Government targets for offshore wind. Further details on the need case for the project are set out below. | N | The Applicant supports the development delivery of the Grimsby to Walpole NGET project. It is a critical piece of infrastructure to allow for a significant amount of clean, home grown, secure energy to be connected to, and transported across the network to where it is required.<br><br>The **Interrelationships with Other Infrastructure Projects Report** (Doc Ref. 7.2) contains further information regarding the interaction between the Scheme and the Grimsby to Walpole Scheme. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | **The national need for the Grimsby to Walpole Project**<br><br>The electricity industry in Great Britain is undergoing unprecedented change. The closure of fossil fuel-powered generation and ageing nuclear power stations means substantial investment in sustainable generation and interconnection capacity is required to maintain energy security and supply standards. Growth in onshore renewable technologies, offshore wind generation, and interconnectors with Europe has resulted in many planned connections, particularly in Scotland, England, and along the East Coast. The UK Government's legally binding "Net Zero" commitment to achieve a 100% reduction in greenhouse gas emissions by 2050 under the Climate Change Act 2008 requires a decisive transition away from fossil fuels. This has driven and will continue to drive investment in low-carbon energy sources.<br><br>Historically, the transmission system relied on coal-powered generation, but the shift to low-carbon energy has resulted in the closure of these stations, with more closures expected. New generation capacity is geographically distant from these historical hubs, requiring substantial updates to the transmission system. Urban areas such as the M62 corridor, the Midlands, and the Southeast have high concentrations of electricity demand. As the UK decarbonises, national energy demand will increase, and fossil fuel generation will be replaced by low-carbon alternatives.<br><br>NGET must ensure the transmission system meets performance and security standards set out in the National Electricity Transmission System (NETS) Security and Quality of Supply Standard (SQSS). This means that where the boundary capacity of the NETS is exceeded against the SQSS, NGET must resolve the capacity shortfall. | | It is important that the Grimsby to Walpole project work closely and collaboratively with those clean renewable projects to ensure that the most economic, efficient, and least impact designs are taken forward across the length of the project, and all projects are considered, including all the generators that provide the critical energy generation, and thus needs case to the Grimsby to Walpole project. It cannot be designed in isolation, and the Applicant has been working with NGET since 2024 to ensure that all of the Meridian designs and assessments are available. |
| National Grid Electricity Transmission PLC | **The national need for the Grimsby to Walpole Project**<br><br>Generators apply to the National Energy System Operator (NESO) to connect to the NETS. Once agreed, these connections are contractually secured. The NETS must be designed to handle peak demand conditions and secured events, ensuring reliability through redundancy to prevent widespread supply interruptions. Performance standards require the system to maintain frequency, avoid overloads, stay within voltage limits, and remain electrically stable during faults.<br><br>The NETS in the area of the Grimsby to Walpole project was primarily constructed in the 1960s to connect inland coal-fired power stations. Later, gas-fired stations were connected in areas such as the Humber. However, coastal regions (which include significant areas relating to the Grimsby to Walpole project), have limited infrastructure, restricting their ability to support new renewable energy connections.<br><br>The Creyke Beck generation group includes connections to existing substations and contracted new generation comprising offshore wind, interconnectors, energy storage, and combined cycle gas turbine (CCGT), with a total contracted capacity of approximately 18.7 GW by 2035. The East Coast group, spanning South Humber to North Wash, has a total contracted capacity of approximately 12.7 GW by 2035, including offshore wind, energy storage, solar, and CCGT. Both groups face significant | N | |

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| | transmission capacity shortfalls, requiring approximately 7 GW of reinforcements each to accommodate new connections and comply with the SQSS.<br><br>The Grimsby to Walpole project is also needed to provide reinforcement across boundaries B8 and B9. Boundaries split the system into two parts, crossing critical circuit paths that carry power between areas and where power flow limitations may be encountered. Boundaries help identify regions where reinforcement is most needed by enabling analysis of power transfers between separated areas. Future Energy Scenarios 2023 reveals substantial capability deficits across these boundaries, with B8 requiring 7,899 MW of additional capacity by 2035 and B9 4,708 MW by 2030. Addressing these deficits will require two 400kV AC double circuits or six HVDC connections for B8, and one 400kV AC double circuit or three HVDC connections for B9. Maximising current capacity under fault conditions will not resolve the deficits, making reinforcements essential.<br><br>Further information on the Project's national importance and its role in meeting Government targets is set out in the Project's Strategic Options Report, available on the Project's website (Grimsby to Walpole \| National Grid). | | |
| National Grid Electricity Transmission PLC | **Interaction with Meridian Solar Farm and engagement with Downing Renewables (the Applicant)**<br><br>Meridian Solar Farm's indicative grid connection corridor (for a proposed overhead line connection between the site and the transmission network) directly overlaps with Grimsby to Walpole's emerging preferred corridor on its approach to the proposed Weston Warsh Substation Siting Zone, presenting a significant conflict between the two projects, and introduces a scenario which neither have assessed as part of their preliminary environmental assessment work.<br><br>The emerging preferred corridor for the Grimsby to Walpole scheme has been in the public domain since January 2024 (the start of our Stage 1 consultation period) and since this time, there has been meaningful engagement between NGET and the Applicant in an attempt to work collaboratively and enable both projects to come forward without significantly impacting each other. The developer has therefore had multiple opportunities to design their scheme in a way that would not directly overlap with, and present a conflict with, the Grimsby to Walpole project. The interaction between the two projects is shown in Figure 1 below. Figure 1 presents an extract from the 'Emerging preferred corridor' plans that formed part of the Grimsby to Walpole Stage 1 consultation early last year, with the indicative area of overlap with the Meridian Solar Farm corridor identified as a red boundary. Figure 2 presents the Meridian Solar Farm site plan published as part of the suite of statutory consultation documents. | N | See the **Interrelationships with Other Infrastructure Projects Report** (Doc Ref. 7.2) for further information regarding the interaction between the Scheme and the Grimsby to Walpole Scheme. The Applicant welcomes ongoing engagement with NGET.<br><br>Significant work has been undertaken through a number of workshops and meetings with the NGET project team to review the interaction between the two schemes and to demonstrate that potential conflicts that can be appropriately managed.<br><br>Work will continue through NGET's design evolution as that project approaches DCO submission in 2027, but the Applicant has engaged at all relevant stages through the consultation and design proposals to ensure that the Scheme presents a design which is compatible with does the project not stop Grimsby to Walpole. Where potential conflicts have been identified, mitigation measures and design solutions have been proposed and, where appropriate, agreed, to enable both projects to come forward. Where identified, the design was appropriately adjusted to ensure that both nationally significant projects can continue to be delivered.<br><br>As highlighted above, the interrelationships document is clear where the projects are close, how they will be managed, and how impacts will be managed and mitigated. |

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| National Grid Electricity Transmission PLC | **Interaction with Meridian Solar Farm and engagement with Downing Renewables (the Applicant)**<br>Since the Stage 1 consultation closed, the refinement of the proposed overhead line alignment has developed further. This process has been informed by responses to the Stage 1 consultation, engagement with statutory bodies, and detailed engineering and design processes. The detailed alignment plans will be published at the statutory consultation which is planned to take place in June 2025.<br>Having reviewed the Meridian Solar statutory consultation material, is noted that the Applicant states in their PEIR (Alternatives and Design Evolution chapter) that "a preference was taken to following a similar route to [Grimsby to Walpole] rather than needing to cross it and create a further visual intrusion to the north-east" which suggests an intentional overlap as a means of reducing landscape and visual impacts. However, the landscape and visual assessment work in the PEIR does not seem to specifically assess the cumulative impact of this project and Grimsby to Walpole in relation to the overhead line infrastructure running parallel to each other on the approach to the Weston Marsh Substation Siting Zone.<br>It is noted that Grimsby to Walpole is included in the Short List of Other Developments (for the project's cumulative impact assessment), and that a temporary overlap in construction periods is stated as occurring between 2029-2033, based on a Q2 2027 submission for G2W. However, there is no mention of operational overlap, i.e. the ongoing permanent effects of two 400kV overhead lines running parallel to each other. | N | It is noted that this response was received in October 2026, prior to the commencement of NGET's further targeted consultation for Grimsby to Walpole in November 2026. which released further information of the siting of Grimsby to Walpole infrastructure. This response was also received prior to further workshops between Meridian Solar and Grimsby to Walpole project teams on the alignment of the two projects.<br>An updated landscape and visual assessment from that presented at PEIR have been assessed within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). The cumulative effects of the Scheme and other committed Schemes in the area, including the Grimsby to Walpole project, have been captured in that assessment.<br>The Chapter concludes that following the construction of the cumulative schemes, the additional cumulative effect introduced by the Scheme (to the effects which would be generated anyway by Grimsby to Walpole) is not considered to be significant on landscape and visual receptors across all phases of the Scheme. However, the totality of the change in the landscape considering the Scheme and all of the cumulative schemes together is considered to be significant. |
| National Grid Electricity Transmission PLC | **Interaction with Meridian Solar Farm and engagement with Downing Renewables (the Applicant)**<br>**Policy context**<br>EN-1 (Overarching National Policy Statement for Energy) sets out the government's commitment to fully decarbonising the power system by 2035, and identifies a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Furthermore, EN-5 (National Policy Statement for electricity networks infrastructure) clarifies that this CNP extends to electricity grid infrastructure, network reinforcement and upgrade works, and notes the important role that new grid projects have in contributing towards connecting low carbon infrastructure to the NETS. The Grimsby to Walpole Project this therefore considered to be of critical national importance to facilitate the decarbonisation of the power system by 2035.<br>NGET acknowledge that the Meridian Solar Farm is also considered to be of critical national importance and has clear policy support within the NPS's. However, if approved, it would obstruct a known emerging alignment for a transmission project which is integral to the country's transition to net zero by 2050. Without the high-voltage electricity transmission line proposed as part of the Grimsby to Walpole project, the electricity transmission system in this area will lack the capacity accommodate all the new renewable energy sources coming forward, including the Meridian Solar Farm project. | N | The Applicant notes this comment.<br>The Applicant notes NGET's comment that both its Grimsby to Walpole project and the Scheme are deemed critical national priority (CNP) projects, however, it does not agree that the implementation of the Meridian Solar Farm would obstruct the delivery of the Grimsby to Walpole project.<br>As noted above, further engagement has occurred since this consultation response was received. Two workshops were arranged with NGET in June & July 2026 to confirm the feasibility of delivering both OHLs, incorporating both Schemes latest designs and routing alignments. Through these workshops, representatives from the two project teams worked collaboratively to find solutions in order to ensure that two overhead lines could be delivered at the points of interaction. This means that both NSIPs could progress without one posing delivery or operational risks to the other. |

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| | | | The Applicant continues to engage with NGET to ensure coordination between its various projects and the Scheme. The Applicant has sought a proportionate degree of flexibility near the Weston Marsh B Substation to account for potential rerouting or undergrounding to manage ongoing design interfaces and phasing coordination as they arise as part of the detailed design process.<br><br>Further detail of technical engagement with NGET is described within the **Interrelationships with Other NSIPs Report** (Doc Ref. 7.2). |
| National Grid Electricity Transmission PLC | **Interaction with Meridian Solar Farm and engagement with Downing Renewables (the Applicant)**<br><br>**Conclusion**<br><br>Given the above, NGET objects to the Meridian Solar Farm scheme and requests that the Applicant re-design their scheme in a way that avoids conflict with the proposed location of future NGET apparatus at this location, given the criticality of the Grimsby to Walpole project to the transmission of energy across the UK, as set out in the Clean Power 2030 report. The delivery of the Grimsby to Walpole project is vital in enabling a number of renewable and low carbon projects to connect to the grid at this location, including the Meridian Solar Farm scheme, and so it is considered in the interest of the Applicant to work collaboratively with NGET to find a solution to the delivery of both projects.<br><br>NGET remain committed to working with the Applicant in a productive manner to seek to facilitate a design which enables both parties to deliver successful and much needed energy generation and transmission schemes. | N | The Applicant notes NGET's comments and the importance of the Grimsby to Walpole project in supporting national electricity transmission objectives. The Applicant also recognises the wider role of transmission infrastructure in enabling the delivery of renewable and low-carbon generation, consistent with national policy.<br><br>The Applicant has engaged proactively through a number of meetings and workshops with NGET to understand the interaction between the two schemes and to inform the design evolution of the Meridian Solar Farm. This engagement occurred both before and after the receipt of this response. It has focused on identifying areas of proximity and potential interaction and on developing proportionate design and mitigation measures to manage those interactions.<br><br>As set out in the **Interrelationships with Other NSIPs Report** (Doc Ref. 7.2), the assessment demonstrates that no unmanageable conflicts have been identified at this stage. The Applicant remains committed to ongoing engagement with NGET as both projects continue to evolve, with a view to managing interactions in a coordinated manner. |
| National Grid Electricity Transmission PLC | **Weston Marsh to East Leicestershire (WMEL)**<br><br>The WMEL project will be a new overhead line transmission project extending from Weston Marsh to the East Leicestershire area. The project is due to launch the Stage 1 consultation in June 2025, which will present an emerging preferred corridor. The WMEL project will be connecting into Weston Marsh substation which is proposed as part of the Grimsby to Walpole project.<br><br>Although there isn't direct interaction between the WMEL project and Meridian Solar Farm, the project forms one of a number of energy generation and transmission projects connecting to the grid | N | The Applicant notes this comment and confirms it is happy to continue to work collaboratively with NGET and the WMEL project.<br><br>As NGET highlight, the WMEL project was launched very recently. Through ongoing workshops and meetings with NGET, the Applicant has sought to understand the emerging proposals for the WMEL project and the wider grid strategy at Weston Marsh. Based on the information currently available, the |

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| | in the Weston Marsh area. Furthermore, the WMEL project will play a vital role in enabling renewable and low carbon projects to connect into the grid along its emerging preferred corridor. NGET is committed to meeting the contracted connections across the Grimsby to Walpole and WMEL projects and as such is seeking to work collaboratively with developers to ensure the delivery of these projects. | | Meridian Solar Farm will not impact or conflict with the design of the WMEL scheme.<br><br>The Applicant remains committed to continued engagement with NGET and the WMEL project team as the design evolves (and all other projects in the area), to working collaboratively to manage interactions between projects and minimise cumulative impacts where practicable. |
| National Grid Electricity Transmission PLC | **Eastern Green Link (EGL) 3 and 4**<br><br>The EGL 3 project will be a new offshore High Voltage Direct Current (HVDC) electrical link from Peterhead to the Norfolk area. EGL4 will be a new offshore HVDC electrical link from east Scotland, also to the Norfolk area. Although there isn't direct interaction, there is likely a cumulative impact to the area depending on the construction timescales.<br><br>It should be noted that there maybe further interactions with additional new strategic infrastructure where the projects are in their early development.<br><br>NGET requests that all existing and future assets are given due consideration given their criticality to distribution of energy across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO. | N | Eastern Green Link 3 and 4 have been included in **ES Appendix 4-1: List of Cumulative Schemes** (Doc Ref. 6.3) and have been considered proportionately within the cumulative assessment, based on the information currently available. The Applicant remains committed continued engagement with NGET to ensure that existing and reasonably foreseeable future assets and interests are given appropriate consideration, and welcomes ongoing constructive engagement to support the coordinated delivery of nationally significant energy infrastructure.<br><br>This includes via ongoing engagement to agree protective provisions to be included within the **Draft DCO** (Doc Ref. 3.1) for the protection of NGETs assets. Eastern Green Link 3 and 4 have been included in **ES Appendix 4-1: List of Cumulative Schemes** (Doc Ref. 6.3) and have been considered proportionately within the cumulative assessment, based on the information currently available. The Applicant will continue to engage with NGET to ensure that existing and reasonably foreseeable future assets and interests are given appropriate consideration, and welcomes ongoing constructive engagement to support the coordinated delivery of nationally significant energy infrastructure. |
| National Grid Electricity Transmission PLC | **Electricity Infrastructure**<br><br>• National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset.<br><br>• Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 5 (2019)", which publicly available. | N | The **Draft DCO** (Doc Ref. 3.1) includes standard protective provisions for electricity undertakers whose assets may be affected. In addition, the Applicant is engaging with NGET to agree bespoke protective provisions, to address the specific circumstances of NGET's assets and land interests and to ensure that statutory safety requirements and operational needs are appropriately safeguarded.<br><br>The Applicant will continue to engage with NGET following submission of the DCO Application through detailed design, to ensure that works are phased accordingly and carried out safely, |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | • If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.<br>• The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.<br>• Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.<br>• If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances. | | ensuring that appropriately clearances are maintained, and that potential impacts on NGET's assets are minimised as far as reasonably practicable. |
| National Grid Electricity Transmission PLC | **Electricity Infrastructure**<br>• Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.<br>• National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.<br>• Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented. | N | The Applicant notes this comment.<br>The **Draft DCO** (Doc Ref. 3.1) includes standard protective provisions for electricity undertakers whose assets may be affected. In addition, the Applicant is engaging with NGET to agree bespoke protective provisions, to address the specific requirements associated with NGET's assets, including works in proximity to tower foundations, underground cables and restrictions on changes to ground levels.<br>The Applicant will continue to engage with NGET following submission of the DCO Application through detailed design, to ensure that works are phased accordingly and carried out safely, ensuring that appropriately clearances are maintained, and that potential impacts on NGET's assets are minimised as far as reasonably practicable. |
| National Grid Electricity Transmission PLC | NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com<br>I hope the above information is useful. Please also see attached the Technical Guidance Note 287; Third-party guidance for working near National Grid Electricity Transmission equipment. If you require | N | The Applicant notes this comment. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | any further information, please do not hesitate to contact me. In the meantime, we look forward to receipt of further information and consultation relating to potential impacts on our assets. | | |

## 2.19. North Kesteven District Council

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| North Kesteven District Council | Thank for you consulting North Kesteven District Council in relation to consultation proposals for the above. We do not have any specific comments to make at this stage, noting that the proposals do not involve works within North Kesteven District. | N | The Applicant notes this comment. |

## 2.20. North Lincolnshire Council

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| North Lincolnshire Council | I can confirm that after consultation with our internal technical consultees that North Lincolnshire Council has no comments or objections to raise in respect of this project with the proposed development not likely to result in any significant impact upon North Lincolnshire.<br><br>I trust that this response has provided the necessary clarification. Do not hesitate to contact me should you wish to discuss this matter further. | N | The Applicant notes this comment. |

## 2.21. Northern Power Grid

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
|---|---|---|---|
| North Lincolnshire Council | On this occasion we regret to inform you that this scheme is outside of Northern PowerGrid's operating area. | N | The Applicant notes this comment. |

## 2.22. Peterborough City Council

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
|---|---|---|---|
| Peterborough City Council | With apologies for the delayed response, we would respectfully request that you take the following comments on board as your proposals progress.<br><br>With regard to PEIR Volume 1 Chapter 13 Traffic and Access, the survey area does not include the A47 / A16 junction and does not include Peterborough City Council network peak hours.<br><br>PCC morning and evening peak hours must be considered when assessing the site's impact; if the level of impact within the peak hours is less than 30 two-way PCU trips at any single junction then no additional capacity assessments would be required, however if they are above this then further assessments will be required.<br><br>The detailed further comments of PCC Local Highway Authority should be read in conjunction with this response.<br><br>I trust that the above advice is of use however should you have any further queries, please do not hesitate to contact me on the details shown at the top of this letter. | N | The traffic and access study area has been updated from the PEIR stage and was presented and agreed at the scoping meeting in September 2025, which was attended by PCC. The study area is shown in **ES Figure 15-1: Traffic and Access Study Area** (Doc. Ref. 6.2)<br><br>As stated within Section 15.5 and 15.8 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) all trips associated with the development will occur outside of the PCC Network peaks and therefore no impacts are expected which will require additional capacity assessments. |
| Peterborough City Council | **Recommendation: Objection**<br><br>The survey area does not include the A47/A16 junction and does not include PCC network peak hours.<br><br>Peterborough network peak hours for the morning and evening must be considered when assessing the site's impacts. If the level of impact within the peak hours is less than 30 two-way PCU trips at any single junction then no additional capacity assessments would be required, however if they are above this then further assessments will be required. | N | The traffic and access study area has been updated from the PEIR stage and was presented and agreed at the scoping meeting in September 2025, which was attended by PCC. The study area is shown in **ES Figure 15-1: Traffic and Access Study Area** (Doc Ref. 6.2)<br><br>As stated within Section 15.5 and 15.8 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) all trips associated with the development will occur outside of the PCC Network peaks and therefore no impacts are expected which will require additional capacity assessments. |
| Peterborough City Council | **PEIR Volume I Chapter 13 Traffic and Access**<br><br>**Worker Journey**<br><br>The Applicant has advised within Section 13.10.4 that there will be approximately 900 FTE workers during the construction phase. They have assumed that 5% (45 of 900 workers) of workers will travel by alternative modes (bus/walk), with the remaining 90% travelling by car.<br><br>The closest bus service is the No.37 Stagecoach between Peterborough and Spalding. This leaves Peterborough at 5am and is an hourly service. However, if traveling from Spalding to the Site the first bus is at 06:19 which falls outside the staff starting hours.<br><br>A review of the walking distance from the site to the closest bus stop has been undertake and, apart from Gate A5, all other gates are positioned in excess of 500m from the site. Furthermore, the | N | The construction staff numbers have been updated from the PEIR stage and are presented in section 15.5 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1).<br><br>The mode share assumptions for the ES Chapter have been updated from the PEIR stage and are presented in section 15.4 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1). It has been assumed that no staff will travel to the Scheme by bus or by walking to provide a robust assessment of traffic flow impacts.<br><br>The assumed vehicle occupancy rate has been updated from the PEIR stage to 1.3 for the purposes of the traffic assessment |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | walking routes from the bus stop to the gates will require staff to walk along unlit roads with no footways. The Applicant needs to consider how those using the bus service will safely assess the site and the Applicant needs to reconsider if 5% of staff will travel to the site via bus given the service times.<br><br>The Applicant has also assumed that the remaining 95% of staff, will travel with an average occupancy of 1.5 staff per vehicle resulting in 570 staff vehicles. However, it is unclear how these assumptions have been formed from. The LHA consider that this assumption is too high, and less staff will car share. This ratio will have an impact on the level of traffic on the network and therefore must be reviewed. | | contained within **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1). This is detailed in section 15.4. |
| Peterborough City Council | **Trip Assessment**<br><br>The Applicant has advised that the key junction study area was agreed with LCC highways on the 18th October 2024 and the key junctions have been outlined within Tabel 13-4 of Chapter 13 of the PEIR.<br><br>The LHA note that the A16 junction with the B1443 (west of Newborough) has been included within the study area.<br><br>The Applicant has also advised that "National Highways will also need to be engaged as their closest route is the A47 which intersects the A16 to the south of the Site (approximately 8km)". However, the LHA consider that the A47/A16 junction needs to be included within the study area at this stage.<br><br>The Applicant should note that their significant highway works proposed to the A47 and A16, including the installation of a new roundabout to serve a residential housing development situated between A16, A47 and Newborough Road. There is not a start date to the proposed works, however there are triggers tied into the planning applications associated with these sites. | N | The traffic and access study area has been updated from the PEIR stage and was presented at the scoping meeting in September 2025, which was attended by PCC. The study area is shown in **ES Figure 15-1: Traffic and Access Study Area** (Doc. Ref. 6.2).<br><br>Regarding the residential housing development off Newborough Road, this development was considered as part of the cumulative traffic and access screening and is listed within Table 1 of **ES Appendix 15-5 Cumulative Schemes Traffic and Access Screening**. The Scheme is not located within 5km of the Cumulative development and is not expected to generate a significant number of trips onto the local traffic network, with the exception of the A16. Additionally, as shown in section 15.8 of ES **Chapter 15: Traffic and Access** (Doc Ref. 6.1), all traffic impacts on receptors located on the A16 have been evaluated as negligible. On the basis of these points, this development has been screened out of the cumulative traffic assessment. |
| Peterborough City Council | The Applicant has advised that site operating hours will be:<br>• Workers will travel to/from site 06:00 to 07:00 and 19:00 to 20:00<br>• HGV movements would be distributed across an 8-hour period (08:00-16:00)<br><br>The Applicant has advised that following analysis of the survey data the AM and PM peak hours have been determined, and therefore the Traffic Flow Diagrams are based on the following hours:<br>• 06:00 – 07:00<br>• 07:00-08:00<br>• 16:00-17:00<br>• 19:00-20:00 | N | The proposed working hours, and the hours which have been evaluated as part of the traffic assessment for the ES stage, have been updated from the PEIR stage and are presented in section 15.5 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1).<br><br>The proposed timings of the HGV movements have been adjusted to occur between 09:00 and 17:00 and so will avoid travelling during the PCC network peaks, i.e. there will be no development traffic on the network between 08:00 and 09:00. This is set out in the **Outline CTMP** (Doc Ref. 7.13). |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | • 24 hours<br>Whilst these are identified as the peak hours, the hours from 08:00-09:00 and 17:00-18:00 are also significantly higher than the remainder of the day in terms of trip rates. The HGV movements will be on the network between 08:00 and 16:00, and therefore 08:00-09:00 should be included within the Traffic Flow Diagrams. This will assist the LHA in determine what impact the HGV movements will have on the network during these peak periods. | | |
| Peterborough City Council | Furthermore, the Applicant has not identified PCC's peak network due to the limited scope of the survey area. Peterborough network peak hours for the morning and evening must be considered when assessing the site's impacts. | N | All trips associated with the development will occur outside of the PCC Network peaks and therefore no impacts are expected which will require additional capacity assessments. |
| Peterborough City Council | The Applicant has advised that there will be approximately 200 HGV deliveries per day (400 two-way movements). The Trip Assignment indicated that 93 HGVs (46%) will travel to the site and 93 HGVs will leave the site via A16 towards the A47. Therefore, it is essential that the LHA understand what impact this will have on PCC peak hours. | N | The number of HGVs associated with the Scheme has been updated from the PEIR stage for the purposes of the traffic assessment contained within **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1). The updated numbers are outlined in section 15.5.<br>All trips associated with the development will occur outside of the PCC Network peaks and therefore no impacts are expected which will require additional capacity assessments. |
| Peterborough City Council | For the purpose of this part of the report, the LHA have used the Applicants assumption that 570 staff will drive to the site by car. When comparing to the Development Trip Assignment, this demonstrates that 305 worker vehicles will access the site from the south (A16/A47 junction). This represents 53% of the total worker traffic travelling to the site via PCC network (however following a further assessment as defined within the Worker journey section of this report, this figure could be higher). | N | The construction staff numbers have been updated from the PEIR stage and are presented in section 15.5 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1).<br>Routing to the site for all vehicle types is presented in **ES Figures 15-3, 15-4 and 15-5** (Doc. Ref. 6.2).<br>The increase in expected traffic flows associated with the Scheme is presented in section 15.8 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1). |
| Peterborough City Council | To conclude from the current assessment 46% of the total HGV traffic and 53% of worker traffic will access the site via the A16/A47 junction. The LHA therefore object to the proposed development as this junction has not been included within the assessment. The LHA require further assessments to been carried out on PCC network and the A47 junction to understand the impact this development could have on the network and what mitigation measures may be required. | N | The traffic and access study area has been updated from the PEIR stage and was presented at the scoping meeting in September 2025, which was attended by PCC. The study area is shown in **ES Figure 15-1: Traffic and Access Study Area** (Doc. Ref. 6.2).<br>All trips associated with the Scheme will occur outside of the PCC Network peaks and therefore no impacts are expected. |
| Peterborough City Council | **Construction period** | N | The construction programme has been updated from the PEIR stage for the ES and is outlined in **ES Chapter 2: The Scheme** (Doc. Ref. 6.1). |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | The Applicant has advised that it is estimated that construction of the Scheme would last 24 to 36 months, with construction of the Grid Connection requiring 18 to 24 months of this construction phase.<br><br>The LHA do not consider that the proposed construction period would be short-term, as the works could take up to 3 years to complete. This will impact PCC network for the duration of the construction traffic, and associated developments in this area. Therefore, a further assessment of trips to the site, PCC peak network periods, and the Traffic Flow Diagrams needs to be reviewed. | | An updated assessment of trips to the Site has been undertaken within **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1). The results of this assessment are presented in section 15.8 and show that all trips associated with the Scheme will occur outside of the PCC Network peaks and therefore no impacts are expected which will require additional capacity assessments. |

## 2.23. South Holland District Council

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| South Holland District Council | **Planning Policy**<br>Whilst the applicant will seek permission for the proposals directly from the Secretary of State for a DCO under section 37 of the Planning Act 2008, there are still a number of local and national planning policies which are considered relevant and should be taken account of as part of the development process. These plans and local knowledge have been formed over several years and have come from a significant evidence base.<br>The South East Lincolnshire Local Plan 2011-2036 (SELLP) was adopted jointly by South Holland and Boston Borough Council on the 8 March 2019. | N | Within the **Planning Statement** (Doc Ref. 7.1) the relevant national and local policy has been considered in the assessment of the proposals. The **Planning Statement Appendix C** (Doc Ref. 7.1) provides an assessment table for the relevant policies within the NPPF and local policy including consideration of the Southeast Lincolnshire Local Plan 2011-2036.<br>This table provides a specific policy response to each of the relevant policies within the Local Plan and each of the relevant paragraphs within the NPPF (updated February 2025). |
| South Holland District Council | **Planning Policy**<br>The relevant policies within the South East Lincolnshire Local Plan 2011-2036 are:<br>• Policy 2 'Development Management' – requires proposals to demonstrate sustainable development considerations have been met through a number of criteria.<br>• Policy 3 'Design of New Development' – requires development to create distinctive places through the use of high quality and inclusive design, demonstrating compliance with a number of considerations.<br>• Policy 4 'Approach to Flood Risk' – developments must satisfy the sequential test and be supported by a site-specific flood risk assessment covering risk from all sources of flooding including the impacts of climate change. It must be demonstrated that surface water from the development can be managed and will not increase the risk of flooding to third parties.<br>• Policy 28 'The Natural Environment' – Requires the protection, enhancement and management of natural assets, by ensuring all development proposals provide an overall net gain in biodiversity. | N | Within the **Planning Statement** (Doc Ref. 7.1) the relevant national and local policy has been considered in the assessment of the proposals. The **Planning Statement Appendix C** (Doc Ref. 7.1) provides an assessment table for the relevant policies within the NPPF and local policy including consideration of the Southeast Lincolnshire Local Plan 2011-2036.<br>This table provides a specific policy response to each of the relevant policies within the Local Plan including: Policy 2 Development Management, Policy 3 Design of New Development, Policy 4 Approach to Flood Risk, Policy 5 Meeting Physical Infrastructure and Service Needs, Policy 6 Developer Contributions, Policy 28 The Natural Environment, Policy 29 The Historic Environment, Policy 30 Pollution, Policy 31 Climate Change and Renewable and Low Carbon Energy, Policy 32 Community, Health and Wellbeing, Policy 33 Delivering a More Sustainable Transport Network, ad  Policy 36 Vehicle and Cycle Parking. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| South Holland District Council | **Planning Policy**<br>The relevant policies within the South East Lincolnshire Local Plan 2011-2036 are:<br>• Policy 29 'The Historic Environment' - Distinctive elements of the South East Lincolnshire historic environment will be conserved and, where appropriate, enhanced.<br>• Policy 30 'Pollution' Development proposals will not be permitted where, taking account of any proposed mitigation measures they would lead to unacceptable adverse impacts upon:<br>◦ health and safety of the public;<br>◦ the amenities of the area; or<br>◦ the natural, historic and built environment;<br>◦ by way of: air quality, including fumes and odour; noise including vibration; light levels; and quality and condition or surface and groundwater quality<br>◦ Planning applications, except for development within the curtilage of a dwellinghouse as specified within Schedule 2, Part 1 of The Town and Country Planning (General Permitted Development) (England) Order 2015, or successor statutory instrument, must include an assessment of:<br>◦ impact on the proposed development from poor air quality from identified sources;<br>◦ impact on air quality from the proposed development;<br>◦ impact on amenity from existing uses<br>• Policy 31 'Climate Change and Renewable and Low Carbon Energy' - All development proposals will be required to demonstrate that the consequences of current climate change has been addressed, minimised and mitigated.<br>• Policy 32 'Community, Health and Wellbeing' - Development shall contribute to the creation of socially-cohesive and inclusive communities; reducing health inequalities; and improving the community's health and well-being.<br>• Policy 33 'Delivering a More Sustainable Transport Network' – reinforces the national approach to promoting sustainable alternatives to the car through new development, making the best use of, and seek improvements to, existing transport infrastructure and services. Solutions that are based on better promotion and management of the existing network and the provision of sustainable forms of travel are supported. To achieve this, a Transport Assessment and associated Travel Plan will be submitted with proposals. | N | Within the Planning Statement (Doc Ref. 7.1) the relevant national and local policy has been considered in the assessment of the proposals. The Planning Statement Appendix C (Doc Ref. 7.1) provides an assessment table for the relevant policies within the NPPF and local policy including consideration of the Southeast Lincolnshire Local Plan 2011-2036.<br>This table provides a specific policy response to each of the relevant policies within the Local Plan including: Policy 2 Development Management, Policy 3 Design of New Development, Policy 4 Approach to Flood Risk, Policy 5 Meeting Physical Infrastructure and Service Needs, Policy 6 Developer Contributions, Policy 28 The Natural Environment, Policy 29 The Historic Environment, Policy 30 Pollution, Policy 31 Climate Change and Renewable and Low Carbon Energy, Policy 32 Community, Health and Wellbeing, Policy 33 Delivering a More Sustainable Transport Network, and Policy 36 Vehicle and Cycle Parking. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
|---|---|---|---|
| South Holland District Council | **Planning Policy**<br>The NPPF was originally implemented in 2012, with the most recent revision being 2019 and an update in 2024. The NPPF sets out the UK Government's planning policies for England and how these are expected to be applied.<br>The NPPF does not contain specific policies for NSIPs (for which particular considerations apply, determined in accordance with the decision-making framework set out in the Planning Act 2008 and relevant NPSs) but may be considered as a relevant consideration as below:<br>• Paragraph 124 - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. Footnote 49 of the NPPF states except where this would conflict with other policies in this Framework, including causing harm to designated sites of importance for biodiversity. | N | |
| South Holland District Council | **Planning Policy**<br>• Paragraph 125 - Planning policies and decisions should:<br>a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;<br>b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;<br>c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;<br>d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure<br>e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed | N | |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers. | | |
| South Holland District Council | **Planning Policy**<br>• Paragraph 161 - The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.<br>• Paragraph 170 - Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.<br>• Paragraph 187 - Planning policies and decisions should contribute to and enhance the natural and local environment by:<br>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);<br>b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;<br>c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;<br>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;<br>e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans<br>f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate. | N | |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| South Holland District Council | **Representations**<br><br>South Holland District Council are a consultee as part of duty to consult (section 42 of the Planning Act 2008). Responses have been sought internally from department officers, parish councils and Councillors. All consultees have the ability to respond direct to the applicant as part of this process however we have presented any responses received.<br><br>South Holland District Council do not have in house specialists or advisers for all areas therefore the below list of representations sets out the comments and advice received from internal consultees as well as external consultants employed by the Council. Where no comments have been received and no external consultant employed, this response will seek to comment generally on the topic areas where appropriate, however it is acknowledged that comments may be sent directly by the County Council and these will be endorsed by the Council.<br><br>As the Council do not have a Landscape Officer, an external company was sought to respond on behalf of the Council, Terra Loci, who are Landscape Architects and specialise in Landscape Planning. This forms the main part of our consideration as the landscape impacts are particularly important to the Council.<br><br>The comments received from consultees are summarised as follows. Please note that for transparency the wording of each response is at is has been received as it is important that these are taken into account by the Applicant in their entirety, unless specified: | N | The Applicant notes this comment. |
| South Holland District Council | **Landscape Visual Impact (Terra Loci, landscape architects appointed on behalf of the Council)**<br><br>**Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br><br>**Structure and Methodology**<br><br>The chapter presents a logically structured preliminary assessment in accordance with GLVIA3 and relevant technical guidance. | N | The Applicant notes this comment. |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br><br>**Study Areas and Viewpoints**<br><br>While it is accepted that significant effects are less likely beyond 10km, the omission of any viewpoints in the 10–15km range is a concern. Inclusion of at least some viewpoints within this outer range would aid transparency and understanding of either the potential for effects or the confidence with which a lack of effects is asserted. Their inclusion would be especially useful in demonstrating how the tallest elements (e.g. pylons) relate to distant sensitive receptors.<br><br>Viewpoints for the grid connection corridor should be submitted and agreed, these should include viewpoints within the administrative areas of Boston Borough Council. | N | Viewpoints 28 and 29 have been included, as shown on **ES Figures 12-19 and 12-20** (Doc Ref. 6.2), to provide long distance views of the Scheme. They are approximately 6km and 10km from the Scheme respectively. These viewpoint locations are sites within the administrative boundary of Boston Borough Council and have been assessed within the LVIA. The locations of these viewpoints were consulted on and agreed with LCC, SHDC and BBC. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br>**Zone of Theoretical Visibility (ZTV)**<br>The ZTVs appear thorough, and the use of LiDAR-based DSM and DTM data is appropriate. That said, the ES should comment on the age and consistency of the screening dataset (given some data is up to nine years old), particularly where vegetation growth or removal may influence visibility. | N | The barrier earth viewshed analysis, presented within **ES Figures 12-12 to 12-18** (Doc Ref. 6.2) has been generated using Environment Agency Digital Terrain Model (DTM), dated 2025, with a 2m resolution. To provide evidence of theoretical screening, two additional databases have been included: OS Open Data (2025) with assumed height for buildings of 8m; and the Forestry Commission National Forestry Inventory (2025) and Ancient Woodland (2025), with an assumed height of 12m. These datasets represent the most up-to-date available information and provide a consistent basis for assessing potential screening effects. |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br>**Baseline and Future Baseline**<br>There is no apparent consideration of the future baseline, either in terms of landscape change (e.g. planned developments, habitat maturation, climate adaptation plans) or likely future land use. This is a key gap and should be addressed in the ES to ensure assessments remain valid over the 40+ year lifetime of the scheme. | N | The future baseline is addressed within Section 12.6 within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1), which considers the likely evolution of the landscape in the absence of the Scheme which acknowledges that the future landscape and visual baseline across the study area is anticipated to remain broadly unchanged. However, built development within the study area is expected to increase, in particular, the number of residential receptors, predominantly around the existing settlements, notably larger settlements identified as Sub-Regional and Main Service Centres within the Local Plan. |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br>**Stakeholder Consultation**<br>It makes no reference to the joint consultation response submitted on behalf of the Local Planning Authorities in June 2024. While it is evident that the majority of comments from that response have been addressed, this omission should be corrected for transparency and to demonstrate due regard to statutory consultees. | N | The consultation response is referenced within the Table 12 3 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br>**Landscape Mitigation Strategy**<br>The planting proposals are noted as indicative and still under development, which is reasonable at this stage. The intention to avoid archaeological constraint areas is supported. | N | The landscape strategy presented within the **OLEMP** (Doc Ref. 7.16) has been developed in liaison with heritage specialists to avoid significant effects on below ground archaeology. |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br>**Lighting**<br>A more detailed assessment of night-time visual effects is recommended at the ES stage, with clarity on lighting locations, specification, timing, and mitigation. | N | Night-time visual effects from lighting have been considered within **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3) and Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). During the construction and decommissioning phases, temporary lighting may be required to enable safe working where activities are undertaken outside of daylight hours. Temporary lighting will be designed as far as |

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| | | | practical to reduce the potential for light spillage and glare outside of the Scheme.<br><br>Lighting will not be required for the solar PV modules during the operational phase. Non-continuous sensor triggered infrared lighting would be positioned around critical electrical infrastructure within the BESS and On-Site Substation Compounds and Cable Sealing End Compounds for security purposes and emergency maintenance. Directional lighting would be used, directed away from Site boundaries. As such, lighting will be limited and unlikely to result in significant visual effects at night-time.<br><br>Good practice measures to minimise light spill off-site have been included within the **OCEMP** (Doc Ref. 7.10), **OLEMP** (Doc Ref. 7.16) and **ODEMP** (Doc Ref. 7.12). |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br><br>**Cumulative Effects**<br><br>The ES should provide a clear matrix of cumulative landscape and visual effects, distinguishing between cumulative landscape character impacts and cumulative visual impacts from key receptor locations. | N | Cumulative effects assessment is presented within **ES Appendix 12-7: LVIA Cumulative Effects** (Doc Ref. 6.3) and summarised within Section 12.11 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). . Cumulative effects on landscape character and visual amenity have been considered separately. |
| South Holland District Council | **Landscape Assessment Tables (Appendix 10-1)**<br><br>**Clarity and Structure**<br><br>The tables are well structured, following a consistent format across receptors and phases. The distinction between the PV Area, Inter-Array Areas, and Grid Connection Corridor is helpful for clarity | N | The Applicant notes this comment. |
| South Holland District Council | **Landscape Assessment Tables (Appendix 10-1)**<br><br>**Operational Phase Assessments**<br><br>Commentary on how much mitigation moderates character change over time is relatively limited. Statements such as "effects remain as per Year 1" potentially understate the impact of 15 years of vegetation growth, and this should be elaborated on. | N | The effects of proposed mitigation on landscape character and visual amenity, including how mitigation moderates character change over time, have been assessed within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided in Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). These assessments consider the nature, timing, and anticipated success of mitigation measures, including the establishment and growth of planting, and how these influence the degree of change and residual effects over the operational period. Commentary is provided on the extent to which mitigation reduces effects and the limitations on reversibility, ensuring |

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| | | | that the assessment does not overstate the potential for full restoration. |
| South Holland District Council | **Landscape Assessment Tables (Appendix 10-1)**<br>**Mitigation and Long-Term Residual Effects**<br>There is a need for more detailed commentary on the nature and success of mitigation over time. For example, while planting is said to "slightly reduce openness", the degree to which this creates a new character baseline or modifies perceptual qualities is left vague. The ES should expand on this to avoid overstating reversibility. | N | The effects of proposed mitigation on landscape character and visual amenity, including how mitigation moderates character change over time, have been assessed within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided in Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). These assessments consider the nature, timing, and anticipated success of mitigation measures, including the establishment and growth of planting, and how these influence the degree of change and residual effects over the operational period. Commentary is provided on the extent to which mitigation reduces effects and the limitations on reversibility, ensuring that the assessment does not overstate the potential for full restoration. |
| South Holland District Council | **Visual Assessment Tables (Appendix 10-2)**<br>**Viewpoint Coverage and Selection**<br>No viewpoints are presented beyond 10km. While effects beyond this distance are unlikely to be significant, inclusion of some representative viewpoints from 10–15km (especially near sensitive settlements or designated landscapes) would help confirm this and improve confidence. | N | Viewpoints 28 and 29 have been included, as shown on **ES Figures 12-19 and 12-20** (Doc Ref. 6.2), to provide long distance views of the Scheme. They are approximately 6km and 10km from the Scheme respectively. These viewpoint locations are sites within the administrative boundary of Boston Borough Council and have been assessed within the LVIA. The locations of these viewpoints were consulted on and agreed with LCC, SHDC and BBC. |
| South Holland District Council | **Visual Assessment Tables (Appendix 10-2)**<br>**Receptor Grouping and Sensitivity**<br>Sensitivity ratings generally appear appropriate, though some footpath users (e.g. long-distance trails) might warrant higher sensitivity ratings than currently shown depending on context. Specific justification for ratings should be confirmed in the ES. | N | Sensitivity ratings of visual receptors have been explained in detail in **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), considering the links between visibility, viewer expectations, and landscape context.<br>Photomontages showing both winter and summer conditions are provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2).<br>Effects of proposed mitigation have been considered as part of the Operational Year 15 assessment within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |
| South Holland District Council | **Visual Assessment Tables (Appendix 10-2)**<br>**Operational and Residual Effects**<br>A clearer link between visibility, viewer expectations, and landscape context is needed to justify conclusions. | N | Sensitivity ratings of visual receptors have been explained in detail in **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), considering the links between visibility, viewer expectations, and landscape context. |

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| South Holland District Council | **Visual Assessment Tables (Appendix 10-2)**<br>**Lack of Photomontages**<br>No photomontages are included at this stage. While this is acceptable for the PEIR, their inclusion will be essential in the ES for receptors experiencing 'Significant' effects. These should include both winter and summer conditions and align with relevant technical guidance (e.g. LI Visualisation Standards, 2019). | N | Photomontages have been produced in accordance with TGN 06/19 Visual Representation of Development Proposals[8] and are presented in **ES Figures 12-21 and 12-22** (Doc Ref. 6.2). |
| South Holland District Council | **Visual Assessment Tables (Appendix 10-2)**<br>**Mitigation Commentary**<br>Similar to the landscape assessment, mitigation effects are sometimes described vaguely. Statements such as "vegetation will establish" should be substantiated with timelines, species detail, and visual screening potential. For visual receptors in particular, perceptibility and seasonal variation of planting success should be explicitly acknowledged. | N | These details are set out within the **OLEMP** (Doc Ref. 7.16) which presents the proposed landscape management strategy for the Scheme. |
| South Holland District Council | **Concerns Regarding Landscape and Visual Impacts from the Grid Connection Corridor Pylons**<br>The introduction of a new lattice pylon line as part of the Grid Connection Corridor represents one of the most visually and physically prominent elements of the proposed development. The associated landscape and visual effects arising from this infrastructure raise a number of concerns that warrant closer scrutiny: | N | The landscape and visual effects of the Grid Connection Route and associated infrastructure within the existing context have been assessed in detail within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1).<br>Photomontages, provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2), include views of the proposed Grid Connection Route. |
| South Holland District Council | **Concerns Regarding Landscape and Visual Impacts from the Grid Connection Corridor Pylons**<br>**Landscape Context and Character Effects**<br>The erection of large-scale pylons through open landscapes introduces a vertical, engineered typology that is fundamentally out of scale and character with the flat, expansive and predominantly horizontal qualities of the area. While the assessment acknowledges 'significant' effects on landscape character during operation, the commentary does not fully engage with the transformative nature of this infrastructure, particularly its potential to introduce a more industrialised character along an otherwise rural corridor. | N | The landscape and visual effects of the Grid Connection Route and associated infrastructure within the existing context have been assessed in detail within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided within Section 12.8 of this chapter.<br>Photomontages, provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2), include views of the proposed Grid Connection Route.<br>**ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) has considered the landscape and visual effects of the industrialisation of a predominantly rural area and change of use of agricultural land, as set out within **ES Appendix 12-4: Landscape Assessment** (Doc Ref 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3). |

[8] Landscape Institute (2019) TGN 06/19 Visual representation of development proposals. Available at: https://www.landscapeinstitute.org/visualisation/. [Accessed 01/11/2025]

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| South Holland District Council | **Concerns Regarding Landscape and Visual Impacts from the Grid Connection Corridor Pylons**<br><br>**Visual Amenity and Receptor Sensitivity**<br><br>Several visual receptors including residential properties, PRoW users, and settlement-edge locations are likely to experience prolonged and unavoidable views of the proposed pylons. This is especially pertinent given the limited screening capacity within the flat landscape.<br><br>While mitigation planting is proposed along parts of the route, its effectiveness in screening tall lattice towers is questionable and may offer only minimal visual relief. Further photomontage testing is required to demonstrate this with confidence. | N | The landscape and visual effects of the Grid Connection Route and associated infrastructure within the existing context have been assessed in detail within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided within Section 12.8 of this chapter.<br><br>Photomontages, provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2), include views of the proposed Grid Connection Route.<br><br>It is recognised that there is very limited visual mitigation which can be used to screen the pylons which is reflected in the assessment. |
| South Holland District Council | **Concerns Regarding Landscape and Visual Impacts from the Grid Connection Corridor Pylons**<br><br>**Cumulative Effects**<br><br>The presence of other vertical infrastructure in the wider area (e.g. existing pylons, wind turbines) is noted, but the cumulative visual and landscape impact of introducing an entirely new pylon corridor of this scale has not been robustly addressed. | N | Cumulative effects assessment is presented within **ES Appendix 12-7: LVIA Cumulative Effects** (Doc Ref. 6.3) and summarised within Section 12.11 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). Photomontages reflecting views of the proposed Grid Connection Route within the context of existing infrastructure and proposed cumulative overhead lines have been provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2). |
| South Holland District Council | **Concerns Regarding Landscape and Visual Impacts from the Grid Connection Corridor Pylons**<br><br>**Justification and Alternatives**<br><br>A clearer justification is required in the ES, particularly for sections of the route that pass close to sensitive receptors or intersect open, exposed fenland landscapes | N | **ES Chapter 3: Alternatives and Design Evolution (Doc Ref. 6.1)** provides information on the alternatives considered and justification for selecting the design for the Grid Connection Route.<br><br>Following the identification of the Site for the Solar Development Area, work was undertaken to inform the siting of the Grid Connection Route for connecting to the future NGET Weston Marsh Substation. In accordance with the starting presumption for overhead lines set out in paragraph 2.9.21 of NPS EN-5, the routeing assessment was based on the assumption that the Grid Connection Route would comprise an overhead line supported by lattice-style pylons. A comparison of the environmental effects of an underground cable and an overhead line is provided within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). When reviewed in combination with engineering feasibility, constructability and cost considerations, a 400kV overhead line was taken forward as the preferred option over an underground cable.<br><br>Holford Rules provide guidelines to seek to avoid adverse impacts through careful routeing of overhead lines. They formed part of the underlying design principles for the Grid Connection Route and the siting of pylons. Further discussion on how the Holford Rules were followed as part of the siting and design of the Scheme is included |

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| | | | within the **Design Approach Document** (Doc Ref. 7.3), submitted as part of this DCO Application. |
| South Holland District Council | **Environmental Protection**<br>Comments were due on 6/6/2025 but have not been received at time of issuing this response. We may send them if they arrive after submission but appreciate, they may not be able to be taken into account. | N | The Applicant notes this comment. |
| South Holland District Council | **Trees and Nature Conservation**<br>In general, as have said before with similar consultations the main concern is: Due to proximity of our District to The Wash, an Internationally recognised wildfowl site. Flying wildfowl and high-power cables linked to the solar farm will not mix. Similarly, with wildfowl which fly to gravel pits just outside of our District. Any such cables proposed above ground will need markers put on them to reduce the number of bird collisions. Presence of such cables may also have an effect on migratory flight paths; needs checking out.<br>Personally, always thought waterfowl would be likely to collide with large solar arrays, landing on them in some weather conditions believing them to be water, like swans are often recorded crash landing on large roads in torrential rain. Have yet to find much evidence of this. | Y | Detailed collision risk modelling and use of bird diverters as mitigation has been included in the operational phase assessment of **ES Appendix 9-14: Habitats Regulations Assessment** (Doc Ref. 6.3) to mitigate collision risk, in order to avoid significant adverse effects on bird populations associated with the Wash SPA / Ramsar using the area.<br>All relevant waterfowl have been assessed as part of SPA waterbird assemblage. Mitigation measures have been designed to reduce impacts and are reported within the ES and the HRA. Migratory waterbirds can travel thousands of kilometres between breeding and wintering sites, negotiating significant man-made infrastructure and modified landscapes along their routes. In addition, there is an absence of data to suggest that birds will mistake solar panels as being a body of water. |
| South Holland District Council | **Forward Planning (Planning Policy) – joint response for South Holland DC and Boston BC**<br>The local plan contains Policy 31: Climate change and renewable and low carbon energy. Part B relates to renewable energy and contains a list of criteria. One relates to land take and this proposal covers about 600H plus the inter array links. It seems that about 26% is not best and most versatile land. The layout of the solar panels also indicates that the best quality land has not been used for the erecting solar panels. However, a lot of grade 2 and 3a land will be used and given the growing concerns about agricultural land loss this impact is still significant.<br>The layout seeks to limit impact on heritage assets by setting the proposal back from scheduled monuments.<br>The cable connections between the parcels of land across the 'inter array' land may be buried cables or overhead cables. Overhead cables clearly have a greater impact although the size of the supporting structures appear to be quite normal in our landscape (15m). However, of much more concern is the size of the pylons that will take the electricity to the proposed Weston Marsh substation. These are likely to be 50m high and around 350m apart and extend for 13 km. This will add to the concerns on the Grimsby to Walpole grid upgrade impact on the landscape. I have been involved with the Heckington Fen solar farm (granted) and the Beacon Fen solar farm that has been submitted to PINS (both in North Kesteven). Both use underground cabling to the substation at Bicker Fen in Boston Borough. Beacon Fen to Bicker is similar to this site | N | An assessment of impacts and effects on agriculture and soils is presented within Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) . As secured through Requirement 21 of the **Draft DCO** (Doc Ref. 3.1) and described within **ES Chapter 2: The Scheme** (Doc Ref. 6.1), all above ground infrastructure associated with the Scheme will be decommissioned at the end of the 40-year operational period. While the duration of operation is long term, the assessment of impacts on agriculture and soils distinguishes between reversible and irreversible land-use change. As no permanent soil sealing is proposed and all infrastructure will be removed, the Scheme does not result in the permanent loss of agricultural land.<br>The **OSMP** (Doc Ref. 7.14) includes measures to protect soil structure and function throughout construction and operation, including careful handling, storage, and reinstatement of soils. These measures are designed to ensure that the soil resource is safeguarded and that agricultural capability is not degraded over the lifetime of the Scheme.<br>Following decommissioning, the land will be restored so far as reasonably practicable to its pre-construction condition, with the aim |

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| | connecting to Weston Marsh substation. Why can't this proposal go underground to the Weston marsh substation? | | of returning it to its existing ALC grade. Post-restoration monitoring is secured within the **OSMP** (Doc Ref. 7.14), and any minor variability from baseline ALC grades identified at that stage would be investigated and addressed to ensure the land is capable of productive agricultural use once reinstated.<br><br>On this basis, while a substantial proportion of the Site comprises BMV land, the majority of the effects from land-take are long-term but reversible, and do not constitute a permanent loss of agricultural land.<br><br>However, there is some uncertainty around whether Grade 1 and 2 land which has been temporarily sealed under hardstanding can be restored to the same ALC grade following decommissioning. As such for a worst-case assessment of impacts, the temporary use of any Grade 1 and 2 land for infrastructure which requires hardstanding to be established has been considered to result in a permanent loss of these grades. In addition, the establishment of trees and shrubs along field boundaries has been assessed as permanent loss of agricultural land.<br><br>In terms of why an overhead line is proposed rather than an underground cable, as stated within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) overhead lines are the preferred technology as guided by national policy contained in the NPS for Electricity Networks, EN-5. Paragraph 2.9.20 states that it is the Government's position that overhead lines should be the strong starting presumption for electricity networks in general. This presumption is reversed where an overhead line would cross a nationally designated landscape; however, the Scheme would neither directly or indirectly impact one of these sites and therefore the presumption of an overhead line for the connection is considered wholly appropriate.<br><br>Impacts from the Scheme on the local landscape and visual amenity of the surrounding area have been fully assessed within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). That chapter within the environmental statement provides a full assessment of the effects of the Scheme on various receptors. The conclusions drawn from the assessment have been used to inform the most effective mitigation measures and therefore to decrease the impact of the Scheme on the environment as much as reasonably practicable. |

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| | | | Regarding the planning balance and the assessment of Local Plan Policy 31 Climate Change and Renewable and Low Carbon Energy, section 5 of the **Planning Statement** (Doc Ref. 7.1) provides a comprehensive planning assessment. This section analyses the results of the ES Chapters, including **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) and **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1), and assesses how the identified residual significant effects, if any, effects the overall planning balance. This section's assessment is conducted with consideration of both national and local policy where relevant. |
| South Holland District Council | **Forward Planning (Planning Policy) – joint response for South Holland DC and Boston BC**<br>This area of South Holland, although not totally devoid of trees in the landscape, is not well treed. The viewpoint photos show this and the proposals show quite significant planting proposals to soften the impact of the scheme. Heckington Fen and Beacon Fen have a single uniform site for the solar farm rather than three in this case and do not have the visual impact for the grid connection. Beacon Fen decided not to progress a second site in their proposal. Heckington Fen and Beacon Fen, therefore, have a more simple case of loss of best and most versatile land V renewable electricity. This scheme also includes landscape impact in the planning balance owing to the lack of trees and the overhead cable connection to Weston Marsh. | N | The proposed landscape mitigation strategy is described within the **OLEMP** (Doc Ref. 7.16). An outline landscape masterplan has also been provided as Figure 1 of the **OLEMP** (Doc Ref. 7.16) to illustrate how the landscape strategy could be implemented. |
| South Holland District Council | **Conservation Officer (Heritage)**<br>No comment has been received during the consultation period. | N | The Applicant notes this comment. |
| South Holland District Council | **Parish Councils**<br>Due to parish council meeting dates, it is not always possible for them to comment in time. We have received comments from Gedney Parish and others are likely to comment directly. | N | The Applicant notes this comment and has had regard to all consultation feedback received from parish councils. |
| South Holland District Council | ***Gedney Hill Parish***<br>The Parish Council believes that any change of use to the current landscape could increase the area's flood risk. The panels will sit on concrete blocks which could change the way the land drains. We would be interested to see a report giving details of any drainage systems that will be required, where the water will discharge and the effect of this on the surrounding area, specifically land in and around Gedney Hill. | N | Solar panel mounting structures would either be mounted via galvanised steel poles driven into the ground, or on 'feet' supported on concrete footings, in areas where steel poles cannot be used (such as adjacent to existing utilities).<br>No concrete footings will be installed in areas of Flood Zone 3a and 3b.<br>Details of the proposed drainage systems are included within the **Outline Drainage Strategy** presented in **ES Appendix 11-4** (Doc Ref 6.3). |
| South Holland District Council | ***Gedney Hill Parish***<br>The Parish Council would like to see a precise map of access roads. GHPC is keen to know how these very small local roads will cope with increased volumes and physical weight of traffic. What are the plans for repair and maintenance of these roads, during construction, during the lifetime of the project and the decommissioning stage? We would also like to see a plan for the roads that | N | **ES Figure 2-5** (Doc. Ref. 6.2) shows the location of all proposed construction, operational and decommission accesses for the Scheme. The designs for each of these accesses are shown in Annex B of the **Outline CTMP** (Doc. Ref. 7.13). |

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| | will be used in the case of the closure of the primary routes. We would like to see an independent assessment of the impact of any increase in traffic through Gedney Hill, either because the roads are being used as transportation links to the construction site or because traffic will use a route through the village when the other roads become too busy due to construction traffic. | | Small local roads will be avoided for traffic routing except where strictly necessary (e.g. those on which a site access is proposed to be located). The proposed routing strategy for HGVs is set out in **ES Figure 15-4** (Doc. Ref. 6.2). and was agreed with LCC and NH in the Transport scoping meeting in September 2025.<br><br>Details on how roads will be managed to mitigate impacts such as increase volume of traffic and physical weight, repair and maintenance, muddy roads and potential road closures are set out in the **Outline CTMP** (Doc. Ref. 7.13).<br><br>As shown in **ES Figures 15-4 and 15-5** (Doc. Ref. 6.2), no HGV or AILs will travel through the Gedney Hill area as part of the routing strategy for the Scheme. In addition, **ES Figure 15-6** (Doc. Ref. 6.2) shows the expected staff trip routing which has been produced using a Gravity Model based on Census data and the Google Maps journey planner. The Gravity Model assessment indicates that staff are unlikely to travel through the Gedney Hill area to access the site. |
| South Holland District Council | ***Gedney Hill Parish***<br><br>The Parish Council would like to see a detailed and independent evaluation of the measures that will be taken to enhance the natural landscape. How will this stark and intrusive construction be blended into the existing landscape? We believe the proposed introduction of woodland is not in keeping with the existing landscape (open fields). The Parish Council would be keen to see remedial measures in keeping with the current landscape. We would also like to see a plan for how any landscape enhancements will be maintained over the life of the project. | N | Mitigation planting proposals, including their maintenance over the operation of the Scheme, are presented within the **OLEMP** (Doc Ref. 7.16). Scattered shrub and tree planting is proposed along field boundaries to provide screening for the Solar Development Areas; however, no isolated blocks of woodland have been proposed. The planting strategy within the OLEMP has looked to provide screening whilst ensuring that the planting proposals are in keeping with the surrounding landscape character. |
| South Holland District Council | ***Gedney Hill Parish***<br><br>The Parish Council would like to see an independent assessment of the anticipated loss of existing biodiversity from the proposed project. We would like to see how the loss/gain of biodiversity will be measured and how it is proposed to minimise the impact on local wildlife during construction, during the project life and in the decommissioning stage. | N | A biodiversity net gain assessment using Defra's statutory metric is presented within the **Biodiversity Net Gain (BNG) Report** (Doc Ref. 7.14) submitted with the DCO Application.<br><br>The **Draft DCO** (Doc Ref. 3.1) Schedule 2 Requirement 8 includes a commitment for the Scheme to achieve BNG in accordance with the **BNG Report** (Doc Ref. 7.9) and the **OLEMP** (Doc Ref. 7.16).. Habitat management measures aimed at improving biodiversity through optimal plant species selection and management practices are detailed in the OLEMP (Doc Ref. 7.16).<br><br>Mitigation measures presented within the DCO Application during construction ensure that impacts are avoided on important habitats where practicable. For instance, the **OCEMP** (Doc Ref. 7.10) outlines measures for the protection of habitats, including avoidance of spills, silting, and containment of invasive non-native species. Proposals for |

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| | | | habitat creation and enhancement post-construction are set out within the **OLEMP** (Doc Ref. 7.16). |
| South Holland District Council | ***Gedney Hill Parish***<br>The Parish Council would like to see an independent visual report assessing the visibility of the site both during the day and at night. In particular we are concerned that, if the site is flood lit, what would be the impact of light pollution at night, on both people and wildlife. | N | Night-time visual effects from lighting have been considered within **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3) and Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). During the construction and decommissioning phases, temporary lighting may be required to enable safe working where activities are undertaken outside of daylight hours. Temporary lighting will be designed as far as practical to reduce the potential for light spillage and glare outside of the Scheme.<br>Lighting will not be required for the solar PV modules during the operational phase. Non-continuous sensor triggered infrared lighting would be positioned around critical electrical infrastructure within the BESS and On-Site Substation Compounds and Cable Sealing End Compounds for security purposes and emergency maintenance. Directional lighting would be used, directed away from Site boundaries. As such, lighting will be limited and unlikely to result in significant visual effects at night-time.<br>Good practice measures to minimise light spill off-site have been included within the **OCEMP** (Doc Ref. 7.10), **OLEMP** (Doc Ref. 7.16) and **ODEMP** (Doc Ref. 7.12). |
| South Holland District Council | ***Gedney Hill Parish***<br>The Parish Council welcomes the report's clarity on what will be built in terms of the Solar Farm but would like to see much more clarity on the effects of construction, this should include, but not be limited to, working hours, numbers of workers on site, numbers of vehicles using the roads and how long construction would be expected to take. We would also like to see further reporting on noise pollution, effects of vibration and changes in air quality particularly in the areas around Gedney Hill. | N | **ES Chapter 2: The Scheme** (Doc Ref. 6.1) provides the assessment parameters for the Scheme during the construction phase, including expected working hours, number of workers, number of vehicles, and duration of work.<br>The potential impact of the Scheme in relation to noise and vibration and air quality are reported in **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1) and **ES Chapter 6: Air Quality** (Doc Ref. 6.1), respectively. |
| South Holland District Council | ***Gedney Hil Parish***<br>The Parish Council believes that potential environmental effects and impacts should be taken into account when determining if the project will help the UK meet statutory Net Zero and other climate ambitions and would like to see a detailed report comparing benefits and costs of changing the use of the land. | N | The possible impact of the Scheme on meeting the net zero targets is assessed within the Lifecycle GHG Assessment presented in **ES Chapter 7: Climate Change** (Doc Ref. 6.1) which concludes that the Scheme demonstrates significant carbon savings, and is therefore considered to have a significant beneficial impact on the climate, therefore supporting the trajectory towards net zero. |
| South Holland District Council | ***Gedney Hil Parish*** | N | Measures to manage and minimise disruption during decommissioning are set out in the **Outline Decommissioning Environmental Management Plan (ODEMP)** (Doc. Ref. 7.12). The ODEMP explains |

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| | The Parish Council would like to see clear plans for the decommissioning of this site and how it will be returned to farming land. We would like to see an independent assessment of how the land will be affected and what this means for the environment. | | how mitigation measures identified in the ES will be implemented during decommissioning.<br><br>Following decommissioning, the land will be restored so far as reasonably practicable to its pre-construction condition, with the aim of returning it to its existing ALC grade. Post-restoration monitoring is secured within the **OSMP** (Doc Ref. 7.14), and any minor variability from baseline ALC grades identified at that stage would be investigated and addressed to ensure the land is capable of productive agricultural use once reinstated. Further details will be provided in the detailed Soil Management Plan should the DCO application be granted. |
| South Holland District Council | **Ward Councillors**<br><br>Cllr Eldridge provided a draft response to us with some questions which we responded to. Cllr Eldridge will be providing her final comments directly to Meridian before the deadline. If these have not been received please let us know as they are important.<br><br>No other comments have been received during the consultation period however Councillors have been advised to comment directly which is wholly expected due to a number of concerns raised during the process and in particular during a members briefing session held in May 2025. | N | The Applicant notes this comment. |
| South Holland District Council | **Review of the PEIR**<br><br>At this stage the following comments are offered in connection with the topic areas as listed. As stated in the aforementioned section, where no opinion has been received from in-house advisors at the Council nor has there been an external consultant employed to provide comment then general observations have been put forward at this stage. | N | The Applicant notes this comment. |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br><br>**Structure and Methodology**<br><br>The chapter presents a logically structured preliminary assessment in accordance with GLVIA3 and relevant technical guidance. The separation between landscape and visual effects is clearly expressed, and the use of worst-case parameters is welcomed and appropriate at this stage. | N | The Applicant notes this comment. |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br><br>**Study Areas and Viewpoints**<br><br>The study areas defined for both the PV Area and the Grid Connection Corridor are appropriate in extent and rationale. The tiered approach to the visual assessment providing a detailed review within 0–5km, grouped assessment from 5–10km, and summary review from 10–15km is | N | Viewpoints 28 and 29 have been included, as shown on **ES Figures 12-19 and 12-20** (Doc Ref. 6.2), to provide long distance views of the Scheme. They are approximately 6km and 10km from the Scheme respectively. These viewpoint locations are sites within the administrative boundary of Boston Borough Council and have been assessed within the LVIA. The locations of these viewpoints were consulted on and agreed with LCC, SHDC and BBC. |

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| | supported. This is a proportionate strategy that rightly prioritises the most likely areas of significant effect.<br><br>However, while it is accepted that significant effects are less likely beyond 10km, the omission of any viewpoints in the 10–15km range is a concern. Inclusion of at least some viewpoints within this outer range would aid transparency and understanding of either the potential for effects or the confidence with which a lack of effects is asserted. Their inclusion would be especially useful in demonstrating how the tallest elements (e.g. pylons) relate to distant sensitive receptors<br><br>Viewpoints for the grid connection corridor should be submitted and agreed, these should include viewpoints within the administrative areas of Boston Borough Council. | | |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br><br>**Zone of Theoretical Visibility (ZTV)**<br><br>The clarification provided on building heights used for ZTV modelling is helpful, and the inclusion of both bare-earth and screened ZTVs is good practice.<br><br>The ZTVs appear thorough, and the use of LiDAR-based DSM and DTM data is appropriate. That said, the ES should comment on the age and consistency of the screening dataset (given some data is up to nine years old), particularly where vegetation growth or removal may influence visibility. | N | The barrier earth viewshed analysis, presented within **ES Figures 12-12 to 12-18** (Doc Ref. 6.2) has been generated using Environment Agency Digital Terrain Model (DTM), dated 2025, with a 2m resolution. To provide evidence of theoretical screening, two additional databases have been included: OS Open Data (2025) with assumed height for buildings of 8m; and the Forestry Commission National Forestry Inventory (2025) and Ancient Woodland (2025), with an assumed height of 12m.<br><br>These datasets represent the most up-to-date available information and provide a consistent basis for assessing potential screening effects. |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br><br>**Baseline and Future Baseline**<br><br>The baseline review appears comprehensive and is informed by a sound range of data sources and site visits.<br><br>However, there is no apparent consideration of the future baseline, either in terms of landscape change (e.g. planned developments, habitat maturation, climate adaptation plans) or likely future land use. This is a key gap and should be addressed in the ES to ensure assessments remain valid over the 40+ year lifetime of the scheme. | N | The future baseline is addressed within Section 12.6 within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1), which considers the likely evolution of the landscape in the absence of the Scheme which acknowledges that the future landscape and visual baseline across the study area is anticipated to remain broadly unchanged. However, built development within the study area is expected to increase, in particular, the number of residential receptors, predominantly around the existing settlements, notably larger settlements identified as Sub-Regional and Main Service Centres within the Local Plan. |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br><br>**Stakeholder Consultation**<br><br>The PEIR chapter references consultation responses from the Planning Inspectorate and Gedney Hill Parish Council, which is appropriate.<br><br>However, it makes no reference to the joint consultation response submitted on behalf of the Local Planning Authorities in June 2024. While it is evident that the majority of comments from | N | This consultation response is referenced within the Table 12-3 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |

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| | that response have been addressed, this omission should be corrected for transparency and to demonstrate due regard to statutory consultees. | | |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br>**Landscape Mitigation Strategy**<br>The planting proposals are noted as indicative and still under development, which is reasonable at this stage. The intention to avoid archaeological constraint areas is supported.<br>Mitigation should focus on reinforcing local landscape pattern linear hedgerows, field boundary enhancements, and scattered trees rather than introducing elements out of character with the receiving landscape. | N | The **OLEMP** (Doc Ref. 7.16) describes the landscape and ecological strategy for planting across the Site which has been designed to provide screening whilst ensuring that the planting proposals are in keeping with the surrounding landscape character (e.g. linear hedgerows, field boundary enhancements and scattered trees). |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br>**Lighting**<br>The PEIR includes limited commentary on lighting, noting only that lighting will be sensor-activated and limited to key infrastructure. In such a rural, low-light baseline, even temporary lighting may result in noticeable visual intrusion.<br>A more detailed assessment of night-time visual effects is recommended at the ES stage, with clarity on lighting locations, specification, timing, and mitigation. | N | Night-time visual effects from lighting have been considered within **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3) and Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). During the construction and decommissioning phases, temporary lighting may be required to enable safe working where activities are undertaken outside of daylight hours. Temporary lighting will be designed as far as practical to reduce the potential for light spillage and glare outside of the Scheme.<br>Lighting will not be required for the solar PV modules during the operational phase. Non-continuous sensor triggered infrared lighting would be positioned around critical electrical infrastructure within the BESS and On-Site Substation Compounds and Cable Sealing End Compounds for security purposes and emergency maintenance. Directional lighting would be used, directed away from Site boundaries. As such, lighting will be limited and unlikely to result in significant visual effects at night-time.<br>Good practice measures to minimise light spill off-site have been included within the **OCEMP** (Doc Ref. 7.10), **OLEMP** (Doc Ref. 7.16) and **ODEMP** (Doc Ref. 7.12). |
| South Holland District Council | **Comments on Landscape and Visual Assessment Tables (PEIR Volume I Chapter 10 Landscape and Visual and PEIR Volume II Figure 10-1 to Figure 10-16)**<br>**Cumulative Effects**<br>The approach to cumulative assessment is appropriate in scope but currently underdeveloped. The ES should provide a clear matrix of cumulative landscape and visual effects, distinguishing between cumulative landscape character impacts and cumulative visual impacts from key receptor locations. | N | The cumulative assessment for landscape and visual has been further developed and is presented in Section 12.11 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). This distinguishes between cumulative landscape character impacts and cumulative visual impacts from key receptor locations. |

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| South Holland District Council | **Landscape Assessment Tables (Appendix 10-1)**<br>**Clarity and Structure**<br>The tables are well structured, following a consistent format across receptors and phases. The distinction between the PV Area, Inter-Array Areas, and Grid Connection Corridor is helpful for clarity. | N | The Applicant notes this comment. |
| South Holland District Council | **Landscape Assessment Tables (Appendix 10-1)**<br>**Operational Phase Assessments**<br>Many landscape receptors are assessed as having 'Medium' magnitude of change with 'Significant' effects during operation (Years 1 and 15), especially within HLCAs and HLCZs. However, commentary on how much mitigation moderates character change over time is relatively limited. Statements such as "effects remain as per Year 1" potentially understate the impact of 15 years of vegetation growth, and this should be elaborated on. | N | The effects of proposed mitigation on landscape character and visual amenity, including how mitigation moderates character change over time, have been assessed within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided in Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). These assessments consider the nature, timing, and anticipated success of mitigation measures, including the establishment and growth of planting, and how these influence the degree of change and residual effects over the operational period. Commentary is provided on the extent to which mitigation reduces effects and the limitations on reversibility, ensuring that the assessment does not overstate the potential for full restoration. |
| South Holland District Council | **Landscape Assessment Tables (Appendix 10-1)**<br>**Mitigation and Long-term Residual Effects**<br>There is a need for more detailed commentary on the nature and success of mitigation over time. For example, while planting is said to "slightly reduce openness", the degree to which this creates a new character baseline or modifies perceptual qualities is left vague. The ES should expand on this to avoid overstating reversibility. | N | The effects of proposed mitigation on landscape character and visual amenity, including how mitigation moderates character change over time, have been assessed within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided in Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). These assessments consider the nature, timing, and anticipated success of mitigation measures, including the establishment and growth of planting, and how these influence the degree of change and residual effects over the operational period. Commentary is provided on the extent to which mitigation reduces effects and the limitations on reversibility, ensuring that the assessment does not overstate the potential for full restoration. |
| South Holland District Council | **Visual Assessment Tables (Appendix 10-2)**<br>**Viewpoint Coverage and Selection**<br>The tables document a robust range of receptor types and distances. However, as previously noted, no viewpoints are presented beyond 10km. While effects beyond this distance are unlikely to be significant, inclusion of some representative viewpoints from 10–15km (especially near sensitive settlements or designated landscapes) would help confirm this and improve confidence. | N | Viewpoints 28 and 29 have been included, as shown on **ES Figures 12-19** and **12-20** (Doc Ref. 6.2), to provide long distance views of the Scheme. They are approximately 6km and 10km from the Scheme respectively. The locations of these viewpoints were consulted on and agreed with LCC, SHDC and BBC. |

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| South Holland District Council | **Visual Assessment Tables (Appendix 10-2)**<br>**Receptor Grouping and Sensitivity**<br>Sensitivity ratings generally appear appropriate, though some footpath users (e.g. long-distance trails) might warrant higher sensitivity ratings than currently shown depending on context. Specific justification for ratings should be confirmed in the ES. | N | Sensitivity ratings of visual receptors have been explained in detail in **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), considering the links between visibility, viewer expectations, and landscape context.<br>Photomontages showing both winter and summer conditions are provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2).<br>Effects of proposed mitigation have been considered as part of the Operational Year 15 assessment within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), with a summary provided within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). |
| South Holland District Council | **Visual Assessment Tables (Appendix 10-2)**<br>**Operational and Residual Effects**<br>For several viewpoints, especially closer to the PV Area and pylons, the magnitude of change is reported as 'Medium' but the supporting commentary downplays visual transformation. A clearer link between visibility, viewer expectations, and landscape context is needed to justify conclusions. | N | Sensitivity ratings of visual receptors have been explained in detail in **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3), considering the links between visibility, viewer expectations, and landscape context. |
| South Holland District Council | **Visual Assessment Tables (Appendix 10-2)**<br>**Lack of Photomontages**<br>No photomontages are included at this stage. While this is acceptable for the PEIR, their inclusion will be essential in the ES for receptors experiencing 'Significant' effects. These should include both winter and summer conditions and align with relevant technical guidance (e.g. LI Visualisation Standards, 2019). | N | Photomontages have been produced in accordance with TGN 06/19 Visual Representation of Development Proposals[9] and are presented in **ES Figures 12-21 and 12-22** (Doc Ref. 6.2). |
| South Holland District Council | **Visual Assessment Tables (Appendix 10-2)**<br>**Mitigation Commentary**<br>Similar to the landscape assessment, mitigation effects are sometimes described vaguely. Statements such as "vegetation will establish" should be substantiated with timelines, species detail, and visual screening potential. For visual receptors in particular, perceptibility and seasonal variation of planting success should be explicitly acknowledged. | N | These details are set out within the **OLEMP** (Doc Ref. 7.16) which presents the proposed landscape management strategy for the Scheme. |
| South Holland District Council | **Concerns Regarding Landscape and Visual Impacts from the Grid Connection Corridor Pylons**<br>The introduction of a new lattice pylon line as part of the Grid Connection Corridor represents one of the most visually and physically prominent elements of the proposed development. The | N | The landscape and visual effects of the Grid Connection Route and associated infrastructure within the existing context have been assessed in detail within **ES Appendix 12-4: Landscape Assessment** (Doc Ref. 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. |

[9] Landscape Institute (2019) TGN 06/19 Visual representation of development proposals. Available at: https://www.landscapeinstitute.org/visualisation/. [Accessed 01/11/2025]

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| | associated landscape and visual effects arising from this infrastructure raise a number of concerns that warrant closer scrutiny.<br><br>**Landscape Context and Character Effects**<br><br>The erection of large-scale pylons through open landscapes introduces a vertical, engineered typology that is fundamentally out of scale and character with the flat, expansive and predominantly horizontal qualities of the area.<br><br>While the assessment acknowledges 'significant' effects on landscape character during operation, the commentary does not fully engage with the transformative of this infrastructure, particularly its potential to introduce a more industrialised character along an otherwise rural corridor.<br><br>The assertion that effects remain unchanged between Year 1 and Year 15, despite the implementation of planting, suggests either an underestimation of residual impact or a lack of effective mitigation. This should be more critically examined and clarified in the ES.<br><br>**Visual Amenity and Receptor Sensitivity**<br><br>Several visual receptors including residential properties, PRoW users, and settlement-edge locations are likely to experience prolonged and unavoidable views of the proposed pylons. This is especially pertinent given the limited screening capacity within the flat landscape.<br><br>While mitigation planting is proposed along parts of the route, its effectiveness in screening tall lattice towers is questionable and may offer only minimal visual relief. Further photomontage testing is required to demonstrate this with confidence. | | 6.3), with a summary provided within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1).<br><br>Photomontages, provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2), include views of the proposed Grid Connection Route.<br><br>In terms of the comment that effects in Year 1 and Year 15 remain despite the implementation of planting, this is because there is very limited visual mitigation which can be used to screen the pylons which is reflected in the assessment. |
| South Holland District Council | **Concerns Regarding Landscape and Visual Impacts from the Grid Connection Corridor Pylons**<br><br>**Cumulative Effects**<br><br>The presence of other vertical infrastructure in the wider area (e.g. existing pylons, wind turbines) is noted, but the cumulative visual and landscape impact of introducing an entirely new pylon corridor of this scale has not been robustly addressed.<br><br>There is potential for the proposed infrastructure to tip the balance from a rural to semi-industrial visual character in some localities, which could have implications for settlement setting and local amenity.<br><br>**Justification and Alternatives**<br><br>At this stage, the PEIR provides limited information on the design rationale for the pylon alignment, tower type, and why alternative connection methods (e.g. undergrounding in visually sensitive areas) were dismissed. A clearer justification is required in the ES, particularly for sections of the route that pass close to sensitive receptors or intersect open, exposed fenland landscapes. | | Cumulative effects assessment is presented within **ES Appendix 12-7: LVIA Cumulative Effects** (Doc Ref. 6.3) and summarised within Section 12.11 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). Photomontages reflecting views of the proposed Grid Connection Route within the context of existing infrastructure and proposed cumulative overhead lines have been provided within **ES Figures 12-21 and 12-22** (Doc Ref. 6.2).<br><br>**ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) has considered the landscape and visual effects of the industrialisation of a predominantly rural area and change of use of agricultural land, as set out within **ES Appendix 12-4: Landscape Assessment** (Doc Ref 6.3) and **ES Appendix 12-6: Visual Assessment** (Doc Ref. 6.3).<br><br>**ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) provides information on the alternatives considered and justification for selecting the design for the Grid Connection Route.<br><br>Following the identification of the Site for the Solar Development Area, work was undertaken to inform the siting of the Grid Connection |

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| | A clearer justification is required in the ES, particularly for sections of the route that pass close to sensitive receptors or intersect open, exposed fenland landscapes.<br><br>In summary we have significant concerns over the landscape impacts of the proposal and in particular those surrounding the impacts of the proposed overhead pylons and substation infrastructure. We would strongly urge and recommend alternative options are explored if the application was to proceed such as consideration of below ground gables and reduced sizes of substation and other above ground infrastructure. | | Route for connecting to the future NGET Weston Marsh Substation. In accordance with the starting presumption for overhead lines set out in paragraph 2.9.21 of NPS EN-5, the routeing assessment was based on the assumption that the Grid Connection Route would comprise an overhead line supported by lattice-style pylons. A comparison of the environmental effects of an underground cable and an overhead line is provided within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1).<br><br>When reviewed in combination with engineering feasibility, constructability and cost considerations, a 400kV overhead line was taken forward as the preferred option over an underground cable.<br><br>Holford Rules provide guidelines to seek to avoid adverse impacts through careful routeing of overhead lines. They formed part of the underlying design principles for the Grid Connection Route and the siting of pylons. Further discussion on how the Holford Rules were followed as part of the siting and design of the Scheme is included within the **Design Approach Document** (Doc Ref. 7.3), submitted as part of this DCO Application. |
| South Holland District Council | **Archaeology and Cultural Heritage**<br><br>Typically this topic area would be picked up by Lincolnshire County Council however having reviewed the information put forward, the approach taken appears reasonable in the methodology and we have the below comments to offer:<br><br>• The Council would expect a detailed landscape and visual assessment for any above ground features and for each to be looked at separately pending the final location and scale.<br><br>• We would expect a scheme of trail trenching to be included as part of the main planning submission. | N | The detailed Landscape and Visual assessment is contained within **ES Chapter 12: Landscape and Visual** (Doc Ref 6.1).<br><br>In terms of trial trenching, archaeological evaluation trenching has been undertaken to support the assessment presented in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). At the time of writing full results of the evaluation are not available, but preliminary results have been used to inform the assessment and where required, the assessment has been based on a precautionary principle to provide a reasonable worst-case assessment. Full trial trenching results will be submitted during examination. Post-excavation assessment and reporting is ongoing and the results will be available within the DCO examination period. |
| South Holland District Council | **Ecology**<br><br>Whilst comments have not been received from the councils ecologist the approach taken appears reasonable in the methodology and we have no specific comments to offer other than the importance of achieving a biodiversity net gain for this proposed nationally significant development, in line with The Environment Act 2021.<br><br>Lastly, temporary construction works can have a significant effect and we would therefore welcome a full scheme of remediation and reinstatement after these works have been undertaken. Lastly, the Wildlife Trust may have chosen to comment directly on the content of the | N | The **Draft DCO** (Doc Ref. 3.1) Schedule 2 Requirement 8 includes a commitment for the Scheme to achieve BNG in accordance with the **BNG Report** (Doc Ref. 7.9) and the **OLEMP** (Doc Ref. 7.16).. Habitat management measures aimed at improving biodiversity through optimal plant species selection and management practices are detailed in the OLEMP (Doc Ref. 7.16).<br><br>Mitigation measures presented within the DCO Application during construction ensure that impacts are avoided on important habitats where practicable. For instance, the **OCEMP** (Doc Ref. 7.10) outlines |

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| | consultation and they are used in the consultation of planning application by the Council and so would welcome, and indeed echo, their comments as to the PEIR as a whole. | | measures for the protection of habitats, including avoidance of spills, silting, and containment of invasive non-native species. Proposals for habitat creation and enhancement post-construction are set out within the **OLEMP** (Doc Ref. 7.16). . |
| South Holland District Council | **Ecology**<br>Comments were received from the Councils Trees and Nature Conservation officer which are summarised as follows and would like them to be taken into consideration in any future submission:<br>• Main concern is proximity of our District to The Wash, an Internationally recognised wildfowl site<br>• Flying wildfowl and high-power cables linked to the solar farm will not mix. Similarly, with wildfowl which fly to gravel pits just outside of our District<br>• Any such cables proposed above ground will need markers put on them to reduce the number of bird collisions<br>• Presence of such cables may also have an effect on migratory flight paths; needs checking out<br>• Waterfowl would be likely to collide with large solar arrays, landing on them in some weather conditions believing them to be water, like swans are often recorded crash landing on large roads in torrential rain | Y | Detailed collision risk modelling and use of bird diverters as mitigation has been included in the operational phase assessment of **ES Appendix 9-14: Habitats Regulations Assessment** (Doc Ref. 6.3) to mitigate collision risk, in order to avoid significant adverse effects on bird populations associated with the Wash SPA / Ramsar using the area.<br>All relevant waterfowl have been assessed as part of SPA waterbird assemblage. Mitigation measures have been designed to reduce impacts and are reported within the ES and the HRA. Migratory waterbirds can travel thousands of kilometres between breeding and wintering sites, negotiating significant man-made infrastructure and modified landscapes along their routes. In addition, there is an absence of data to suggest that birds will mistake solar panels as being a body of water. |
| South Holland District Council | **Geology and Ground Conditions**<br>South Holland District Council do not have an in-house geologist and the Coal Authority may have chosen to comment directly on the content of the consultation, however having reviewed the information put forward, the approach taken appears reasonable in the methodology however the soil management practices may need further evidence. | N | Details of soil management processes are contained within the **Outline SMP** (Doc Ref. 7.14). Further information will be contained within the Detailed SMP should the DCO application be granted. |
| South Holland District Council | **Hydrology, Hydrogeology and Flood Risk**<br>Lincolnshire County Council act as Lead Local Flood Authority and may comment directly to the proposed development. having reviewed the information put forward, the approach taken appears reasonable in the methodology and we have no specific comments to offer. | N | The Applicant notes this comment. |
| South Holland District Council | **Agriculture and Soils**<br>Whilst Natural England are best placed to comment on the topic area, we would raise concern over the amount of highly sensitive land affected over the four PV land parcel areas (74%) which a proportion is Grade 1 agricultural land. | N | An assessment of impacts and effects on agriculture and soils is presented within Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1). As secured through Requirement 21 of the **Draft DCO** (Doc Ref. 3.1) and described within **ES Chapter 2: The Scheme** (Doc Ref. 6.1), all above ground infrastructure associated with the Scheme will be decommissioned at the end of the 40-year operational period. While the duration of operation is long term, the assessment of |

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| | The extent of land impacted and the loss of mostly high or very highly sensitive land is a significant concern, especially in areas that would have permanent effects such as the solar panels themselves, the substation and other above ground infrastructure.<br><br>It is noted that following decommissioning the Applicant states that the original grading will be returned to, however as noted in the submitted documentation, the operational phase is expected to be 40 years, therefore the claim of a temporary impact is not accepted. | | impacts on agriculture and soils distinguishes between reversible and irreversible land-use change. As no permanent soil sealing is proposed and all infrastructure will be removed, the Scheme does not result in the permanent loss of agricultural land.<br><br>The **OSMP** (Doc Ref. 7.14) includes measures to protect soil structure and function throughout construction and operation, including careful handling, storage, and reinstatement of soils. These measures are designed to ensure that the soil resource is safeguarded and that agricultural capability is not degraded over the lifetime of the Scheme.<br><br>Following decommissioning, the land will be restored so far as reasonably practicable to its pre-construction condition, with the aim of returning it to its existing ALC grade. Post-restoration monitoring is secured within the **OSMP** (Doc Ref. 7.14), and any minor variability from baseline ALC grades identified at that stage would be investigated and addressed to ensure the land is capable of productive agricultural use once reinstated.<br><br>On this basis, while a substantial proportion of the Site comprises BMV land, the majority of the effects from land-take are long-term but reversible, and do not constitute a permanent loss of agricultural land.<br><br>However, there is some uncertainty around whether Grade 1 and 2 land which has been temporarily sealed under hardstanding can be restored to the same ALC grade following decommissioning. As such for a worst-case assessment of impacts, the temporary use of any Grade 1 and 2 land for infrastructure which requires hardstanding to be established has been considered to result in a permanent loss of these grades. In addition, the establishment of trees and shrubs along field boundaries has been assessed as permanent loss of agricultural land. |
| South Holland District Council | **<u>Agriculture and Soils</u>**<br><br>As the Council Forward Planning officer states: "*The local plan contains Policy 31: Climate change and renewable and low carbon energy. Part B relates to renewable energy and contains a list of criteria. One relates to land take and this proposal covers about 600H plus the inter array links. It seems that about 26% is not best and most versatile land. The layout of the solar panels also indicates that the best quality land has not been used for the erecting solar panels. However, a lot of grade 2 and 3a land will be used and given the growing concerns about agricultural land loss this impact is still significant*". | N | Siting of infrastructure within the Scheme layout has considered a full suite of environmental constraints, including ALC grades. The mitigation hierarchy has been applied by considering opportunities to avoid higher grade soils, where practicable. However, as the potential for the Scheme to result in permanent impacts on soils is limited (refer to Section 5.8 **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1)) and large areas of the Site comprise BMV agricultural land, it has not been possible to avoid the use of BMV land in all instances. Where BMV land could not be avoided, impacts would be mitigated through the soil management measures set out within the **OSMP** (Doc Ref. 7.14). |

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| | | | Further information is provided within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). |
| South Holland District Council | **Noise and Vibration**<br>No comments have been received by the Council's Environmental Health Officer however we have reviewed the information put forward and the following comments are provided:<br>• Please provide the Council Environmental Protection team with appropriate contact details in event of complaints;<br>• Ensure the Council Environmental Protection team and all relevant Noise sensitive receptors in the immediate area are informed of any proposed works outside of normal working hours;<br>• Maintain sound barriers in good order; and<br>• Vibration, ensure the Council Environmental Protection team and all Vibration Sensitive Receptors in immediate area are informed of operations such as piling where vibration is likely to exceed 0.3mms and ensure appropriate monitoring equipment is used in vicinity of works | N | In the event of complaints, these will be dealt with be a Community Liaison Officer in accordance with Requirement 4 of the **Draft DCO** (Doc Ref. 3.1) as per the **OCEMP** (Doc Ref. 7.10). Further details will be provided in the detailed CEMP.<br>As per the **OCEMP** (Doc Ref. 7.10) information will be provided to the relevant local authority and local residents to inform them of potential noisy works. In the event work outside of core hours is required Section 61 consents would be obtained.<br>In terms of sound barriers, as stated in the **OCEMP** (Doc Ref 7.10), these will be installed where required around the Order Limits to screen receptors from noise emissions if trenchless works are required within 50m of a sensitive receptor.<br>As per the **OCEMP** (Doc Ref. 7.10) prior to construction works being undertaken, liaison will be undertaken with occupiers of sensitive receptors that may be adversely affected by construction noise and vibration. |
| South Holland District Council | **Economy and Social Impact**<br>From an economic and social perspective, the Council would like to see the development doing as much as it possibly can to maximise the benefits for local people and businesses for hosting this infrastructure.<br>We also have concerns surrounding the temporary impacts on accommodation by contractors during construction and the possible impacts this could have with the accommodation requirements needed by the council for interim social housing opportunities (i.e bridging accommodation for people waiting on social housing and the homeless in temporary accommodation).<br>Whilst we acknowledge and welcome the proposed Community benefit fund we are concerned about its management and accessibility and would strongly urge that this is clarified and made transparent as we are aware from other similar sized projects that the community fund is often unattainable for many groups. | N | The **Outline Skills, Supply Chain and Employment Plan** (Doc Ref 7.17) sets out measures to maximise benefits for local residents and businesses, including any proposed employment or skills schemes.<br>Further information on the proposed Community Benefits Fund is provided within the **Planning Statement** (Doc Ref. 7.1).<br>The potential impacts on accommodation associated with the temporary construction workforce are assessed in **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1), which concludes there will be no significant residual effects. |
| South Holland District Council | **Traffic and Transport**<br>Lincolnshire County Council act as highways authority and will comment directly to the proposed development. Having reviewed the information put forward, the approach taken appears reasonable in the methodology and but we have the following comments to offer: | N | A community liaison officer for contact regarding construction issues will be identified once a contractor has been appointed. Details pertaining to remediation and reinstatement after the works have been undertaken will be contained within the Detailed CTMP. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | • One community liaison person in place for contact with any issues should they arise whilst works are being carried out<br>• Consideration of the effect of mud on roads as well as the impact of large load vehicles on roads which are already in a poor state<br>• Consideration of works traffic hours in relation to effects on local transport<br>• Construction compounds and field accesses in the countryside can have a significant effect and we would therefore welcome a full scheme of remediation and reinstatement after the cable/works have been undertaken | | Details on how roads will be managed to mitigate impacts such as increased volume of traffic and physical weight, repair and maintenance, muddy roads and potential road closures are set out in the **Outline CTMP** (Doc. Ref. 7.13).<br>Details on the working hours, peak worker numbers on site, peak construction traffic and the duration of the construction period are set out in the **OCTMP** (Doc. Ref. 7.13) and in Sections 15.40 and 15.6 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1). |
| South Holland District Council | **Air Quality**<br>The Council's Environmental Health Officer has not yet responded, however the following comments are provided in relevance to the development at this stage:<br>1. Burning of waste should be avoided. Any burning of waste deemed strictly necessary should be undertaken in accordance with the relevant waste management exemption issued the Environment Agency, and consideration should be given to the timing of such burning, and the prevailing weather conditions to impact emissions to air and nuisance to offsite receptors<br>2. Soil stockpiles should be sealed to recued fugitive dust emissions<br>We note comments in the submission regarding reducing fire risk from overheating on battery storage during heat waves however we would ask for further information in this regard as there was not a lot of commentary around this topic area. | N | 1. All construction waste will be recycled and/or disposed of in accordance with industry good practice. Burning of waste or unwanted materials will not be permitted on site in accordance with the **OCEMP** (Doc Ref. 7.10).<br>2. Details of how soil will be stored are provided within the **Outline SMP** (Doc Ref. 7.14). Further details will be provided in the detailed SMP should the DCO application be granted. The detailed SMP will be required to be in accordance with the measures included in the Outline SMP.<br>Measures to mitigate air quality impacts are included within the **Outline CEMP** (Doc Ref 7.10), this includes covering materials if they are being reused on site.<br>In terms of reducing fire risk from overheating on battery storage during heat waves, as described within the **OBSMP** (Doc Ref. 7.18), the BESS will be fitted with Heating, Ventilation and Air Cooling (HVAC) systems, which will provide climate control for the BESS enclosure. Furthermore, cooling of the battery modules will be provided by an independent liquid cooling system which is separate to the HVAC system. If temperatures exceed critical limits or the climate control system fails, the BESS will automatically shut down. These measures will reduce the fire risk associated with overheating from battery storage, including during heat waves. |
| South Holland District Council | **Concluding Remarks**<br>Whilst we appreciate many associated stakeholders will comment directly to the Applicant on the project, we wanted to provide a robust and inclusive response by giving all internal stakeholders (and some external with direct affiliation) the opportunity to comment that may not be fully aware of the proposals. | N | The Applicant acknowledges that, at the time of statutory consultation, certain elements of the Scheme, such as the detailed routing and the extent of above-ground infrastructure, were still undergoing refinement. These aspects have since been further developed and assessed through the environmental impact assessment process, ensuring that all design evolution and potential effects are fully |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | Whilst some elements of the proposal are clear in its aims, others such as the extent and requirement of above ground structures and chosen routes and substation connection are still to be clarified. It is not until this time that the full effects on South Holland District Council can be fully appreciated and therefore commented upon. It is only when the full EIA submission is made that comments on specific impacts will be made.<br><br>As stated, we have significant concerns over the landscape impacts of the proposal and in particular those surrounding the proposed overhead pylons and substation infrastructure. We would strongly urge and recommend alternative options are explored if the application was to proceed such as consideration of below ground gables and reduced sizes of substation and other above ground infrastructure.<br><br>We are also concerned over the loss of grade 1 agricultural land, amongst other concerns discussed earlier in this response such as the accessibility of the proposed Community Development Fund. | | understood. The outcomes of this work are comprehensively reported within the Environmental Statement submitted alongside the DCO Application, providing a complete and transparent account of the Scheme as now proposed.<br><br>The consideration of alternatives, including design evolution and route selection, is set out in **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). This chapter explains how reasonable alternatives have been assessed and how the Scheme has been refined in response to technical, environmental and consultation considerations.<br><br>The landscape and visual impact of the Scheme (including those associated with overhead lines and substation infrastructure) is assessed within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). This assessment considers construction and operational effects and identifies mitigation measures where appropriate.<br><br>An assessment of impacts and effects on agriculture and soils is presented within Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1). While a substantial proportion of the Site comprises BMV land, the majority of the effects from land-take are assessed as long-term but reversible. No permanent soil sealing is proposed and, as secured through Requirement 21 of the **Draft DCO** (Doc Ref. 3.1) and described within **ES Chapter 2: The Scheme** (Doc Ref. 6.1), all above ground infrastructure associated with the Scheme will be decommissioned at the end of the 40-year operational period.<br><br>The **OSMP (**Doc Ref. 7.14) includes measures to protect soil structure and function throughout construction and operation, including careful handling, storage, and reinstatement of soils. Following decommissioning, the land will be restored so far as reasonably practicable to its pre-construction condition, with the aim of returning it to its existing ALC grade. Post-restoration monitoring is secured within the **OSMP** (Doc Ref. 7.14).<br><br>For the purposes of a worst-case assessment, where there is uncertainty as to whether Grade 1 and 2 land beneath hardstanding could be restored to its original ALC grade, this has been conservatively assessed as a permanent loss. In addition, the establishment of trees and shrubs along field boundaries has been assessed as permanent loss of agricultural land. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | | | In relation to community benefits, the Applicant notes the comments raised and confirms that it is currently investigating how a community benefit fund could be managed and delivered independently.<br><br>Once the Scheme is operational and the Community Benefit Fund is established, funds will be available for recommendations on where money could be use and is open to further engagement regarding its delivery. |
| South Holland District Council | We note your community engagement to date however we would welcome future discussions over any proposed community benefits as well as any proposed employment and skills schemes that could be provided to the local workforce as well as any other potential grid infrastructure improvements that may be facilitated by the development.<br><br>This advice is based upon the information available at this time. Please note that the advice is given without prejudice to any future comments made by the Local Planning Authority upon the receipt of further information, whether during or before the submission of a full DCO application.<br><br>We kindly ask that the comments received from stakeholders listed are taken into consideration as you can see there is in part strong feelings about the proposal.<br><br>If you have any queries, please do not hesitate to contact me on the details provided and I would appreciate it if all future correspondence could be made directly to myself as I have been instructed by the Local planning Authority to act on their behalf until the end of the application process. This will avoid any delays in our response as we have struggled to allow internal consultees sufficient time to get back to us. | N | The Applicant notes this comment and thanks South Holland District Council for its consultation. |
| South Holland District Council | **Construction Phase**<br><br>We welcome the development of a Construction & Environmental Management Plan that considers fully the potential impacts from noise, dust, lighting and vibration, and mitigates against them as far as is reasonably practical. | N | This comment is noted by the Applicant. An **OCEMP** (Doc Ref. 7.10) has been submitted as part of the DCO Application. |
| South Holland District Council | In particular, steps must be taken to:<br>• Reduce the noise impact at those locations described as 'moderate (significant)' given the duration of the construction. | N | Mitigation measures to reduce noise impacts are included within the **OCEMP** (Doc Ref. 7.10) which has been submitted as part of the DCO Application. |
| South Holland District Council | • Where possible, when deciding on the final route for the grid connection corridor, opportunities to reduce the number of residential receptors experiencing minor effects due to construction noise should be taken wherever possible. | N | Consideration has been had to avoiding residential receptors in designing the refined Grid Connection Route. For further details please refer to **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). The noise impact of the Scheme on residential receptors has been assessed in **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1). Measures to mitigate construction noise impacts are included within the **OCEMP** (Doc Ref. 7.10). |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| South Holland District Council | • Demonstrate adequately that any construction management mitigation will be sufficient to reduce the air quality impacts to receptors to 'negligible', particularly for those receptors living very close to track out routes. | N | The impact of construction on air quality has been assessed within **ES Chapter 6: Air Quality** (Doc Ref. 6.1) which concludes no significant effects are expected. Best practice measures to reduce air quality impacts including dust are included within the **OCEMP** (Doc Ref. 7.10). |
| South Holland District Council | • Adopt those steps suggested as 'desirable' in para 14.2.114. We are particularly keen to see real time monitoring for PM10 & PM2.5, as this appears to only have been considered in respect of vehicle emissions, and not soil dust. | N | No additional monitoring is proposed as no significant air quality impacts are expected. See **ES Chapter 6: Air Quality** (Doc Ref. 6.1). |
| South Holland District Council | • Provide suitable and sufficient waste construction waste disposal facilities, it is not appropriate to burn waste on this site. | N | All construction waste will be recycled and/or disposed of in accordance with industry good practice and the **Outline Site Waste Management Plan** (Doc. Ref. 7.19). Burning of waste or unwanted materials will not be permitted on site in accordance with the **OCEMP** (Doc Ref. 7.10). |
| South Holland District Council | **Operational Phase**<br><br>In terms of operational noise, we have serious concerns about the impact to some receptors, particularly RG29, where their current soundscape, with a very low baseline noise level, will be significantly adversely impacted based on the current modelling. We appreciate that the noise is technically reversable, but given the schemes 40 year lifespan we do consider this to be permanent in the lifetimes of those receptors who live there, and good acoustic design should be applied to the scheme to reduce this impact prior to production of the Environmental Statement. Where possible, similar consideration to reducing impact should be given to RG07, RG09, RG27 & RG34. Given the number of bungalows in the area of RG29, consideration should be given to noise mapping at 1.5m and the presence of buildings with non-standard constriction should also be considered. | Y | In response to statutory consultation feedback, the locations of substation compounds, BESS and other noise generating plant have been moved to minimise the operational noise effects identified in the PEIR. The position of noise-generating plant, as identified on the Illustrative Masterplan, now avoids significant effects at RG07, RG09, RG27, RG29 and RG34.<br><br>The assessment is based on external noise and vibration levels at a premises and does not make any assumptions about the construction of a building. As such, **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1) presents a precautionary assessment.<br><br>Operational noise mapping at 1.5m height is provided to show noise propagation at first floor height, to represent living rooms or bedrooms, including those in non-typical residences.This approach ensures that potential effects on sensitive receptors, such as bungalows and other properties, are appropriately considered.<br><br>Refer to the assessment of operational noise effects are presented in Section 13.8 and Section 13.10 of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1).<br><br>Commitment to operational noise limits is presented in Section 13.9 **of ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1) and secured by a requirement in the **Draft DCO** (Doc. Ref. 3.1). Illustrative masterplan figure is presented in **ES Figure 2-2: Indicative Solar Development Area and Inter-Array Layout Plan** (Doc Ref. 6.2). |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| South Holland District Council | **Operational Phase**<br>40 properties were suggested to be impacted by glint and glare at a moderate or high level resulting in a significant adverse effect. Steps must be taken to reduce this, such as discussed in Appendix 14-2. When the Environmental Statement is produced, a map showing the locations would be appreciated. | N | An updated glint and glare assessment has been undertaken and is provided within **ES Appendix 16-2: Glint and Glare Assessment** (Doc Ref. 6.3) which has considered the design parameters of the Scheme identified in **ES Chapter 2: The Scheme** (Doc Ref. 6.1). Following updates to the design parameters since statutory consultation, the updated glint and glare assessment demonstrates that no residual significant effects remain on residential properties. |
| South Holland District Council | **Operational Phase**<br>Impact to the flight path at Crowland Airfield, described as significant, has been identified. We recommend that further specialist advice be sought on this matter by the airfield safeguarding team and/or the CAA. | Y | As summarised in Table 16-8 of **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1), further engagement has been undertaken with Peterborough and Spalding Gliding Club at Crowland Airfield regarding the glint and glare impact of the Scheme.<br>Solar PV Panels have been removed from the Scheme at the runway thresholds at Crowland Airfield and, as confirmed in **ES Appendix 16-2: Glint and Glare Assessment** (Doc Ref. 6.3), impacts are expected to be acceptable and not significant. |
| South Holland District Council | **Operational Phase**<br>No information has been provided on provision of security lighting, either during construction or operation and we request that this is included in the next phase of consultation. | N | Information regarding management of construction phase lighting is provided in Section 2.6 of the **OCEMP** (Doc Ref. 7.10). This confirms that the use of lighting will be minimised to that required for safe site operations; lighting will utilise directional fittings to minimise outward light spill and glare; and lighting will be directed towards the middle of the Site rather than towards land outside of the Order Limits.<br>Information regarding management of operational phase lighting is provided in Section 2.5 of the **OOEMP** (Doc Ref. 7.11). This confirms that during the operational phase, permanent security lights with motion detectors would be used for security purposes around the electrical infrastructure, emergency access points to facilities within the Scheme, and potentially at other locations of critical infrastructure. However, no areas of the Scheme are proposed to be permanently lit. |
| South Holland District Council | **Operational Phase**<br>Regarding your proposed additional monitoring, we make the following comments:<br>It was not clear from your email or the map exactly where additional monitoring would be undertaken - it is the orange dots, red dots, or both please? | N | Additional monitoring locations identified during the ES are presented and differentiated through the use of colour. These have been included alongside the original PEIR and ES monitoring locations to clarify the extent of supplementary monitoring undertaken.<br>Refer to **ES Figure 13-1: Study Area, Receptor and Noise Monitoring Positions** (Doc Ref. 6.2). Additional monitoring undertaken at locations in July and August 2025 are symbolised by a green dot. |
| South Holland District Council | The purpose of the additional noise monitoring was not set out, so it is difficult for us to comment regarding its sufficiency. Our greatest area of concern was RG29 as referred to above, | Y | Since submission of the PEIR, the illustrative masterplan has been updated with the substation located in land parcel D moved north, so it |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| | which relates to ML14. Why has this area not been selected for additional monitoring? The monitoring point was not central to the receptors, nor to the proposed noise sources. We have identified this as a point where we would like to see additional sound monitoring data, ideally at the northern and southern ed of the receptor, or in a direct line between the proposed noise sources and the receptors. | | is no longer adjacent to RG29. As such, the potential operational noise effect at RG29 is substantially reduced compared to the PEIR operational noise assessment.<br><br>Monitoring location ML14 was deemed to be suitably representative of baseline sound conditions at receptors within RG29. Langary Gate Road is the dominant noise source that influences baseline conditions at both ML14 and RG29. ML14 is located approximately 90m from Langary Gate Road, whereas the nearest property in RG29 is located approximately 25m from Langary Gate Road. As such, noise levels measured at ML14 are likely to be lower than the 'actual' noise levels at RG29, making the use of ML14 data a conservative approach. Given the updated masterplan and the conservative nature of the baseline data applied, additional monitoring at RG29 is not considered necessary.<br><br>Refer to **ES Figure 2-2: Indicative Solar Development Area and Inter-Array Layout Plan** (Doc Ref. 6.2) and **ES Figure 13-1: Study Area, Receptor and Noise Monitoring Positions** (Doc Ref. 6.2)**.** |
| South Holland District Council | When will the unattended 7 day noise monitoring be undertaken? We have concerns regarding the current time of year in relation to this. The current period (through to early September) is likely to be "skewed" by both harvesting periods and the use of audible bird scarers in the proposed monitoring areas close to farmland. The pea and grain harvest is generally quite disruptive in terms of short term noise and continues for 24 hours a day, 7 days a week. So although most properties will only be affected say 2 nights of the year, if that's 2/7th of your monitoring data, it will not be representative (affected 0.5% of the time vs 28% of the time). Without monitoring visits how will you know to disregard this? We recommend where activity is likely that the monitoring should either be in person, or with additional audio files if appropriate. | N | Unattended noise monitoring was undertaken in February, July and August of 2025.<br><br>Operational noise is assessed using the LA90 background sound level, which is the level of sound that is exceeded for 90% of the time and represents the "relative quietness" of a location. Bird scarers typically generate intermittent, impulsive sounds, which are unlikely to influence the LA90 background sound level, as this statistical metric represents the level exceeded for 90% of the measurement period and is resistant to intermittent noise. The effect of bird scarer noise on the LAeq (average sound energy level) is also likely to be negligible unless occurring with high frequency during the measurement period.<br><br>Regarding harvesting activities, any sustained influence on measured noise levels has been identified as atypical increases in noise levels. Where atypical increases were identified, the affected periods were excluded from the background noise analysis to ensure the dataset remains representative of typical conditions at nearby receptor groups.<br><br>Refer to **ES Figure 13-1: Study Area, Receptor and Noise Monitoring Positions** (Doc Ref. 6.2) and **ES Appendix 13-2: Baseline Noise Surveys** (Doc Ref. 6.3). |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| South Holland District Council | We have reservations regarding the set up if the unattended monitoring with regards to microphone height, which seems unduly low, what is the reasoning regarding this? | N | The microphone height of 1.5m above ground level has been selected in accordance with standard industry guidance and best practice for environmental noise monitoring. Specifically, this height aligns with the guidance set out in BS 7445-1 and BS 4142 which state that the microphone should typically be placed at a height of 1.2 m to 1.5 m for free-field measurements. Refer to **ES Appendix 13-2: Baseline Noise Surveys** (Doc Ref. 6.3) for further details. |

## 2.24. Water Management Alliance (WMA), representing South Holland Internal Drainage Board (IDB)

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Water Management Alliance (WMA), representing South Holland Internal Drainage Board (IDB) | The proposed Meridian Solar project would be situated within the district of two IDBs: South Holland IDB and North Levels IDB (as identified in the PEIR Volume II Figure 8-3) and therefore the Byelaws of these Boards will apply. This response relates only to South Holland IDB and it is anticipated that North Levels IDB will respond separately to the current consultation. Whilst the Board's regulatory process (as set out under the Land Drainage Act 1991 and the Board's Byelaws) is separate from the planning (unless disapplied and replaced with a protective provision), the ability to implement a planning permission may be dependent on the granting of any required Land Drainage Consents. | N | The Applicant recognises that the Scheme is located within the districts of South Holland Internal Drainage Board (IDB) and North Levels IDB, and that the Boards' byelaws and consenting regimes apply unless otherwise disapplied.<br><br>The Applicant is seeking to disapply the relevant IDB byelaws and replace them with appropriate protective provisions within the **Draft DCO** (Doc Ref. 3.1), in accordance with the Planning Act 2008 regime.<br><br>The Applicant is engaging with South Holland IDB regarding the drafting of bespoke protective provisions, to ensure that the Board's statutory functions, assets and land drainage interests are appropriately protected, and that the Scheme can be implemented without prejudice to effective land drainage management. |
| Water Management Alliance (WMA), representing South Holland Internal Drainage Board (IDB) | Information on the Board's byelaws, the Planning and Byelaw Strategy, and how to apply for Land Drainage consent is presented in Annex 1 at the end of this letter. The most common types of Land Drainage Consent required are summarised below:<br>• Byelaw 3: Discharge of water to a watercourse (treated foul or surface water)<br>• Section 23, Land Drainage Act 1991 / Byelaw 4: Alteration of a watercourse<br>• Byelaw 10: Works within 9 metres of an arterial watercourse ('Main Drain')<br>• Byelaw 6: Diversion of flows. | N | As set out above, the Applicant is seeking to disapply the relevant IDB byelaws and replace them with appropriate protective provisions within the **Draft DCO** (Doc Ref. 3.1), and is engaging with South Holland IDB on the drafting of bespoke protective provisions to ensure that the Board's statutory functions, assets and land drainage interests are appropriately protected.<br><br>Ongoing engagement with South Holland IDB will continue to ensure that matters relating to discharges, works to watercourses, works within proximity to main drains and flow diversions are appropriately managed through the DCO regime. |
| Water Management Alliance (WMA), representing South Holland Internal Drainage Board (IDB) | The IDBs welcome discussions (outside of this statutory consultation) around the land drainage consenting process and how this will interact with the project (such as consideration of whether it would be appropriate for the Board's regulatory position to be protected through a protective provision).<br><br>Our comments on the Meridian Solar project relate to Land Parcel D (including the inter-array connection area around Whaplode Drove and solar panel areas between Gedney Hill and Holbeach St. Johns, and the entire Grid Connection Corridor and the Weston Marsh Substation Area. Land Parcels A, B and C are not within the South Holland IDD. Dynamic maps of the Board's Internal Drainage Districts and arterial watercourses are available via the website (see 'dynamic map' for interactive mapping): https://www.wlma.org.uk/south-holland-idb/home/#Board's%20Area | N | As set out above, the Applicant is seeking to disapply the relevant IDB byelaws and replace them with appropriate protective provisions within the **Draft DCO** (Doc Ref. 3.1), and is engaging with South Holland Internal Drainage Board on the drafting of bespoke protective provisions to ensure that the Board's statutory functions, assets and land drainage interests are appropriately protected.<br><br>The Applicant notes that South Holland IDB's comments relate to Land Parcel D and the Grid Connection Route, including the Weston Marsh Substation Area, and confirms that these areas have been considered accordingly. The Applicant also notes that Land Parcels A, B and C do not fall within the South Holland Internal Drainage District. |

| Respondent | Comment | Scheme Change (Y/N)? | Applicant Response |
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| Water Management Alliance (WMA), representing South Holland Internal Drainage Board (IDB) | **Preliminary Environmental Impact Assessment (PEIR)**<br>The IDBs' consultation response is based up Chapter 8 of the PEIR: Hydrology, Flood Risk and Water Framework Directive (WFD).<br>We note that this major project has the potential to affect hydrology and flood risk in the South Holland IDD for example via installation of watercourse crossings, haul road infrastructure, earthworks and pylon foundation works, the introduction of significant new impermeable surfaces, cabling beneath watercourses, and other works. The PEIR has identified that the majority of the proposed development area lies within a High Risk area (Flood Zone 3) (PEIR Volume II Figures 8-1 and 8-2). The very large number of surface water features seen in these figures illustrates the reliance of this whole district on surface water drainage systems, which could be impacted by the proposed project works. | N | The FRA includes consideration of the effects on the surface water drainage strategy and sets out measures to ensure that impacts are appropriately mitigated. The Outline Drainage Strategy incorporates sustainable drainage systems and pollution control measures to manage surface water.<br>The **FRA** is included as **ES Appendix 11-3** (Doc Ref 6.3), and the **Outline Drainage Strategy** is included as **ES Appendix 11-4** (Doc Ref 6.3). |
| Water Management Alliance (WMA), representing South Holland Internal Drainage Board (IDB) | **Preliminary Environmental Impact Assessment (PEIR)**<br>We therefore welcome the project's commitment to undertake a Flood Risk Assessment, and to scope in the assessment of effects on the surface water drainage regime. We also welcome the intention, as set out within Chapter 8 of the PEIR, to mitigate impacts to surface water drainage and water flow, using embedded mitigation including, but not limited to:<br>• Following best practice to be set out in a Construction Environmental Management Plan and a Decommissioning Environmental Management Plan;<br>• Utilising sediment management plans; Agreement of protective provisions in the Development Consent Order (DCO) for the benefit of drainage authorities to govern the procedure and allow for specified works in proximity to drainage authority drainage assets;<br>• Use of Sustainable Drainage Systems (SuDS);<br>• Agreement and application of a Drainage Strategy; and<br>• Pollution control measures. | N | The FRA includes consideration of the effects on the surface water drainage strategy and sets out measures to ensure that impacts are appropriately mitigated. The Outline Drainage Strategy incorporates sustainable drainage systems and pollution control measures to manage surface water.<br>The **FRA** is included as **ES Appendix 11-3** (Doc Ref 6.3), and the **Outline Drainage Strategy** is included as **ES Appendix 11-4** (Doc Ref 6.3).<br>The Applicant can confirm that the Scheme is committed to producing a Construction Environmental Management Plan, Decommissioning Environmental Management Plan, and Drainage Strategy, which would be secured as part of the requirements within the **Draft DCO** (Doc Ref. 3.1). Further, the above documents will require the implementation of:<br>• Sediment management;<br>• Sustainable Drainage Systems (SuDS);<br>• Pollution control measures. |
| Water Management Alliance (WMA), representing South Holland Internal Drainage Board (IDB) | **Preliminary Environmental Impact Assessment (PEIR)**<br>Further, we would seek commitment from the project to develop, through further direct consultation with the IDBs, a Watercourse Crossing Plan and Schedule. We also note that the detailed design drawings for any structures that could affect watercourses in the IDDs would need to be consented or approved by the relevant IDB.<br>In terms of future baselines, we would like to emphasise that South Holland IDB may need to increase the capacity of its drainage assets (watercourses and pumping stations) within the | N | An indicative crossing schedule has been produced. Refer to **ES Appendix 2-1 Indicative Watercourse Crossing Schedule** (Doc Ref 6.3).<br>Further consultation with IDBs has been undertaken and is reported in Table 11 3 in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1).<br>Cumulative effects have been considered in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) Section 11.11 and are concluded to be not significant in respect of Ossian Wind Farm. |

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| | lifetime of the proposed project, for example by increasing the width of watercourses. This needs to be factored in during watercourse crossing design.<br><br>With regards to cumulative impacts, in addition to the projects scoped in (listed in section 8.11 of the PEIR), we consider the proposed Ossian Transmission Project should also be scoped in, because a part of its works are likely to be located very close to the Meridian project's grid connection works at Weston Marsh. | | |
| Water Management Alliance (WMA), representing South Holland Internal Drainage Board (IDB) | **Land Requirement**<br><br>The proposed project could affect land that is owned by the IDBs. Discussions are ongoing between the Water Management Alliance Estates Officer (on behalf of South Holland IDB) with regards to land ownership, access and easements. We look forward to continuing these discussions to achieve agreement on these matters. | N | This Applicant notes this comment. |