Meridian Solar

# Meridian Solar Farm

EN010169

## Volume 8

## Post-Submission Application Documents

## 8.5 Relevant Representations Report

APFP Regulation 5(2)(q)

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

**September 2026**

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# 1. Introduction

## 1.1. Overview

1.1.1. This report provides Meridian Solar Farm Limited's (the 'Applicant's) response to the matters raised in the Relevant Representations submitted by Interested Parties concerning Meridian Solar Farm (the Scheme).

1.1.2. A total of 212 Relevant Representations were submitted by Interested Parties within the Relevant Representation Period (21 May to 2 July 2026).

1.1.3. All Relevant Representations have been reviewed, summarised and tabulated according to the nature of their interest in the Scheme. To avoid repetition similar issues raised by members of the public, landowners and businesses have been grouped using thematic analysis. Microsoft Copilot was used by the Applicant solely to assist with the triaging of representations for allocation to the relevant technical specialists. All outputs were reviewed by the Applicant to confirm they had been correctly assigned. No AI programme was used to draft responses, which were prepared and reviewed by the relevant specialists.

1.1.4. The documents submitted with the DCO Application are also referenced in this report, using the reference number [APP-XXX], where the numbers are the application documents number, as set out in the Examination Library.

1.1.5. All Relevant Representations have been responded to by setting out the Applicant's position on the matter at the time of writing.

## 1.2. Structure of this Report

1.2.1. The document is structured as follows:

- Section 2 – Applicant's Response to Local Authorities
- Section 3 – Applicant's Response to Statutory Consultees
- Section 4 – Applicant's Response to Parish Councils
- Section 5 – Applicant's Response to Non-Statutory Organisations
- Section 6 – Applicant's Response to Members of the Public, Landowners and Businesses.

# 2. Applicant's Response to Local Authorities

## 2.1. Overview

2.1.1. The tables below set out the Applicant's responses to the Relevant Representations from local authorities.

2.1.2. Where text within the representations summarises the documentation submitted by the Applicant, it has not been reproduced in the tables below.

## 2.2. South Holland District Council

2.2.1. Table 2-2 below sets out the Applicant's response to the issues raised within the Relevant Representation from South Holland District Council [RR-183] including signposting to the relevant sections of the DCO Application.

**Table 2-2 South Holland District Council**

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| Agriculture and Soils | | |
| **SHDC-001**<br>High sensitivity agricultural land | Chapter 5 of the Environmental Statement presents the findings of the applicant's assessment of the likely significant effects on agriculture and soils as a result of the proposed development.<br><br>Natural England are best placed to comment on this chapter of the Environmental Statement, however we wish to raise concern over the amount of highly sensitive land affected over the four PV land parcel areas (74%). The extent of land impacted and the | The ALC grades of land within the Order Limits are tabulated within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1), including land of very high and high quality (Best and Most Versatile (BMV) agricultural land). As set out in Table 5-10 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) BMV agricultural land is estimated to comprise 39.2% of the overall Solar Development Area on the basis of the ALC survey results. It is not clear, therefore, how the 74% has been derived. Potentially, it derives from provisional or predictive ALC mapping. However, neither of those datasets were presented in the ES because they have |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | loss of mostly high or very highly sensitive land is a concern. | been superseded by survey data of greater quality and spatial resolution, providing one sample per hectare. Of the 39.2% BMV land, 20% is Grades 1 and 2 and is described as very highly sensitive, and 19.2% is Subgrade 3a which is highly sensitive. The Solar Development Area does not sterilise the land and opportunities for pastoral agriculture during operation will be explored. Following decommissioning, the land will be returned to agricultural use, and it is not lost. Descriptors for the sensitivity of the land relate to its productive capacity not to the sensitivity of the soil to disturbance. It is also noted that soils within BMV land are frequently more resilient to disturbance than soils in lower quality land and can be restored more readily.<br><br>In consultation with Natural England, it was acknowledged that restoration of areas of hardstanding to the baseline may be more protracted than could be achieved during the decommissioning phase. For the purposes of impact assessment, set out within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1), all hardstanding within BMV land is treated as if permanent development. This is a conservative approach as all infrastructure will be removed at decommissioning and the land impacts are long-term temporary: the land is not lost. Indeed, during operation opportunities for pastoral agriculture will be explored. These considerations mean that the Applicant considers the adoption of some very highly and highly sensitive land is |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | balanced against the benefits of renewable energy and provision of other environmental benefits, particularly biodiversity net gain.<br><br>Applicant's engagement with Natural England on the agricultural land surveys and assessment is set out within the **Statement of Common Ground with Natural England** (Doc Ref. 8.13). |
| **SHDC-002**<br>Long-term agricultural land loss | 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. Removing such an area of land for food production for a generation is a very disruptive change. Given climate conditions changing the applicant's case for soil quality being maintained is not accepted and the lack of space for arable use of the land remains, therefore the impact of 40 years of food production loss has not been correctly acknowledged. Further evidence for location of concrete foundations on Grade 1 and 2 | Removing land within the Solar Development Area from cultivation and the maintenance of permanent vegetation cover during the lifecycle of the Scheme protects soil from erosion, improves soil structure and improves carbon sequestration. Soil health is anticipated to improve over the operational period, particularly under climate change and extreme weather events. Decommissioning of the Solar Development Areas will aim to restore all agricultural land to the original ALC grade, as set out within the **Outline Soil Management Plan (OSMP)** (Doc Ref. 7.14 Rev 1).<br><br>DEFRA's UK Food Security Report 2024[1] identifies that "*food production levels can be maintained or increased alongside the land use change required to meet our Net Zero and Environment Act targets*". Land use change associated |

[1] DEFRA (2024) United Kingdom Food Security Report 2024. Available at: https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2024 [Accessed 29/07/2026]

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | soils is required with justification why other and lesser graded land areas have not been chosen. | with solar development is not identified as a risk to food security in the UK. Furthermore, as set out within Section 5.11 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1), it is estimated that cumulative solar projects in Lincolnshire, together with the Scheme, 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 across the identified solar projects. This is indicative that solar schemes represent a small proportion of agricultural and BMV land in the County.<br><br>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, for activities which may have permanent impacts on soils. Where BMV land cannot be avoided, impacts will be mitigated through the soil management measures set out within the **OSMP** (Doc Ref. 7.14 Rev 1). Further information is provided within **ES Chapter 3: Alternatives and Design Evolution** [APP-054]. |
| **SHDC-003**<br>Use of provisional mapping | The details of Chapter 5 appear to show an omission for the assessment of the impacts of the Inter-Array Connections and the Grid Connection Route. Provisional mapping has been used with the suggestion of further detailed surveys, post-consent | The effects on soils and agricultural land within the Inter-Array Connections and the Grid Connection Route have been assessed on a worst-case basis, using existing data, within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1)). As set out within the **OSMP** (Doc Ref. 7.14 Rev 1) |

| Topic | Matter Raised | Applicant's Response |
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| | (See Chapter 5 Paragraph 5.6.19 and 5.8.5). Whilst it is appreciated this is not an entire omission of assessment, provisional maps are not considered the most reliable for use at major developmental scale. An assessment post-consent denies interested parties the chance to provide comment. Assess the impacts and understand if correct measures have been taken to avoid the best graded land from being developed on.<br><br>As mentioned, it is best placed for Natural England and the County Council to provide further comment on this subject matter, it is the understanding of the Council that these surveys were requested previously. | at Section 3.1, it is considered that a detailed ALC survey for the entirety of the Inter-Array Connections and the Grid Connection Route would not guarantee avoidance of BMV agricultural land and that a targeted soil survey is most appropriate to determine requirements for restoration. This approach reflects the flexibility incorporated within the **Works Plans** [APP-009 to APP-010] for the siting of the infrastructure within the Order Limits.<br><br>The results of ALC surveys would be very unlikely to lead to a change in the alignment of the Inter-Array Connections and the Grid Connection Route within the Order Limits, due to the presence of other environmental constraints within the Site. The Inter Array Connections and the Grid Connection Route have, as a worst-case, been assumed to be wholly on ALC Grade 1 and 2 land based on Natural England's provisional mapping within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1).<br><br>During the operational phase, it is only the areas of the wooden poles within the Overhead Inter-Array Connection and the pylon bases and infrastructure associated with Cable Sealing End Compounds (CSECs) within the Grid Connection Route which are taken out of agricultural use. These are small areas distributed over several kilometres. In addition, and as mentioned above, due to other environmental constraints across the Site (such as existing watercourses, vegetation, below ground archaeology, |

| Topic | Matter Raised | Applicant's Response |
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| | | residential receptors etc.) and considering that permanent impacts on soils can be avoided through appropriate soil management measures, there is limited potential for the soil survey results to determine the location of infrastructure. Furthermore, the preference of landowners is generally to keep infrastructure close to field boundaries to limit disturbance to the overall farming of a field, regardless of the location of individual patches of soils with a higher ALC grade. Therefore, the targeted soil sampling of the Grid Connection Route and the Inter Array Connections to be undertaken post-consent will provide more relevant data for informing the detailed Soil Management Plan (SMP) instead, which is to be prepared in substantial accordance with the **OSMP** (Doc Ref. 7.14 Rev 1). This approach is also precedented among other NSIPs, such as Tillbridge Solar Project, Sunnica Energy Farm and Yorkshire GREEN.<br><br>The Applicant's engagement with Natural England on the agricultural land surveys and assessment is set out within the **Statement of Common Ground with Natural England** (Doc Ref. 8.13). Natural England note that whilst their standard advice is to request pre-application ALC surveys within the entirety of the Order Limits, the absence of surveys within the Grid Connection Route and Inter-Array Connections pre-consent is not considered material to decision-making. |

| Topic | Matter Raised | Applicant's Response |
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| | | In light of the above it is the Applicant's view that the approach taken to the assessment of the Inter-Array Connections and the Grid Connection Route is appropriately robust. |
| **SHDC-004**<br>Food production impacts | The impact of losing land for food production for at least 40 years is considered significant with agricultural sectors in South Holland and Boston impacted significantly, whilst the Applicant has provided a dismissal of food security impacts, this is not accepted by the Council with the impacts to the region likely to be very significant for a generation of farming. | The Applicant acknowledges the concern around food security. DEFRA's UK Food Security Report 2024[1] identifies that "*food production levels can be maintained or increased alongside the land use change required to meet our Net Zero and Environment Act targets*". Land use change associated with solar development is not identified as a risk to food security in the UK. Furthermore, as set out within Section 5.11 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1), it is estimated that cumulative solar projects in Lincolnshire, together with the Scheme, 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 across the identified solar projects. This is indicative that solar schemes represent a small proportion of agricultural and BMV land in the County.<br><br>With regards to potential impacts on the agricultural sector, **ES Chapter 14: Socio-Economics and Land Use** [APP-065] considers direct land-take effects and indirect severance effects of the Scheme on agricultural businesses. Overall, |

| Topic | Matter Raised | Applicant's Response |
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| | | no significant effects on the operation of these businesses are considered likely to occur. |
| Cultural Heritage | | |
| **SHDC-005**<br>Incomplete trenching and route assessment | No comments have been received from the Council's Archaeological and Cultural Heritage consultant, however having reviewed the information put forward, the following comments are provided:<br>• At the time of publication Chapter 8 has been provided with an incomplete evaluation of trenching. This should be updated when trenching has been completed and details provided to all interested parties to comment.<br>• An assessment of the impacts of the Inter-Array Connections should be provided.<br>• An assessment of the impacts of the Grid-Connection Route should be provided and not deferred until post -determination. | The Applicant has submitted the final evaluation trenching results and deposit modelling at Deadline 1 within **Final Archaeological Evaluation Report** (Doc Ref. 8.6) and shared the documents with Historic England and Lincolnshire County Council (LCC) prior to the submission. The Applicant has reviewed the assessment presented within **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) as a result of this additional information and has concluded that the additional results do not change the conclusions regarding the potential impact of the Scheme on the cultural significance of the archaeological deposits.<br>An assessment of impacts from the Inter-Array Connections and the Grid Connection Route is presented within **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) on the basis of a precautionary approach, in order to ensure a robust assessment. The scope and deferral of further archaeological investigation works within the Inter-Array Connections and the Grid Connection Route has been agreed with LCC's Archaeological Advisor and is reflected within the **Outline Archaeological Mitigation and Management Strategy** (OAMMS) (Doc Ref. 8.7) submitted at Deadline 1. |
| **SHDC-006**<br>Full cultural heritage assessment | The Applicant has not yet provided a full assessment of the impacts of the development on Cultural Heritage and this should be provided and not deferred in order to ensure a sufficient | |

| Topic | Matter Raised | Applicant's Response |
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| | assessment of harm and the application of mitigation can be applied to the development. | |
| Human Health | | |
| **SHDC-007**<br>Construction dust | Our main area of concern is construction dust. Given the schemes construction period, this is a long time for people to be affected, and we see the impact this has on residents over the duration of such projects. Therefore, we seek to ensure this is minimised by design, as well as by mitigation, for example, appropriate location of haul roads and stockpiles. | **ES Chapter 6: Air Quality** [APP-057] provides a detailed assessment of construction dust risks, having regard to the duration of construction period and proximity of residents. It commits to robust mitigation measures in line with IAQM guidance[2], such as covering and managing stockpiles, and installing and maintaining haul roads away from sensitive receptors. These measures are secured through the **Outline Construction Environmental Management Plan (OCEMP)** (Doc Ref. 7.10 Rev 2) and **Outline Decommissioning Environmental Management Plan (ODEMP)** (Doc Ref. 7.12 Rev 1), which also require regular monitoring, complaint management, and coordination with other nearby construction sites. Further details of these measures can be found in Sections 6.7, 6.8, and Table 6-8 of **ES Chapter 6: Air Quality** [APP-057]. With these mitigation measure in place, **ES Chapter 6: Air Quality** [APP-057] concludes that there would be no significant adverse effects from construction dust. |

[2] Institute of Air Quality Management (2024) Guidance on the Assessment of Dust from Demolition and Construction. Available at: https://iaqm.co.uk/wp-content/uploads/2013/02/Construction-Dust-Guidance-Jan-2024.pdf [Accessed 29/07/2026]

| Topic | Matter Raised | Applicant's Response |
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| **SHDC-008**<br>Earthworks extent | The stated total earthworks are less than 1.8 hectares. This is considered low and improbable due to the scale of the development including all cable routing, access roads, building foundations, battery storage compounds and other development areas. It is considered necessary that this is clarified to all interested parties. | The earthworks area (<18,000 $m^2$) reflects only the portions of the Site where soil disturbance is anticipated, based on illustrative construction layout plans (refer to **ES Figure 2-6** [APP-078] and **ES Figure 2-7** [APP-079]). Although the overall Site is approximately 1,616 ha, earthworks are limited, due to the nature of the proposed end use, and heavy earth moving vehicles are unlikely to be used extensively. According to IAQM guidance[2], this results in a 'Small' dust emission magnitude.<br><br>Appropriate dust control measures will be implemented throughout the construction phase, including road cleaning, wheel washing facilities, and dust monitoring. These measures represent established industry best practice and have a proven track record of effectively controlling trackout and associated dust emissions on construction sites. As a result, dust impacts are expected to remain not significant. Further detail is provided in Sections 6.7, 6.8, and Table 6-12 of **ES Chapter 6: Air Quality** [APP-057]. |
| **SHDC-009**<br>HGV traffic, mud and dust | The risk of heavy HGV traffic bringing mud onto roads and therefore causing significant dust impacts and health risks is considered high under the current proposal. It is therefore considered that this is further assessed with better and more consistent requirements for hard surfacing at access/egress points ensured. | The potential for HGVs to track mud onto local roads and contribute to dust generation has been recognised and addressed through a range of embedded mitigation measures. These include the provision of hard surfaced haul routes, regular cleaning of haul roads, and wheel washing facilities. Such measures represent established good practice and have a proven track record of effectively controlling trackout and associated dust emissions on |

| Topic | Matter Raised | Applicant's Response |
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| | | construction sites. Their implementation is secured through the **OCEMP** (Doc Ref. 7.10 Rev 2) and **ODEMP** (Doc Ref. 7.12 Rev 1), ensuring dust and human health risks are appropriately managed. Further details are provided in Section 6.7 and Table 6-8 of **ES Chapter 6: Air Quality** [APP-057]. |
| **SHDC-010**<br>BESS fire risk | The omission of Battery storage fires from Chapter 6 is not considered appropriate with the significant and serious impacts to human health if they do occur | The Applicant's **Outline Battery Safety Management Plan** (OBSMP) [APP-284] fully accommodates the latest BESS safety requirements contained in NFPA 855 (Standard for the Installation of Stationary Energy Storage Systems) (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. The OBSMP has been prepared for the Scheme using guidance from Lincolnshire Fire and Rescue Service (LFR) and incorporating recommendations of the National Fire Chiefs Council (NFCC). The OBSMP very clearly documents the fire and explosion protection requirements for the illustrative BESS design and the BESS system that will be selected at the detailed design stage.<br><br>Potential fire incidents involving battery energy storage systems (BESS) and substations have also been assessed separately in **ES Appendix 16-4: Unplanned Emissions Assessment from BESS** [APP-259], with a summary of the assessment provided within Section 16.5 Major Accidents and Disasters of **ES Chapter 16: Other Environmental Topics** [APP-067]. The appendix includes modelling of |

| Topic | Matter Raised | Applicant's Response |
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| | | potential emissions from thermal events affecting single or multiple cabinets, addressing the potential health impacts. The assessment demonstrates that after a distance of approximately 200m from a fire, any toxic emissions (hydrogen fluoride used as a proxy) would reduce to below the acute exposure guideline levels published by Public Health England. Given that the BESS Compound would be sited a minimum of 350m from residential receptors, concentrations will be below relevant health thresholds at any existing residential receptor location. |
| Hydrology and Flood Risk | | |
| **SHDC-011** Groundwater flooding and cumulative impacts | Lincolnshire County Council act as Lead Local Flood Authority and may comment directly to the proposed development. Having reviewed the information put forward, it is not understood why Chapter 11 omits groundwater flooding given the nature of the soils and known high groundwater level. Additional information is also required on the cumulative impacts of the development. | As set out within **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.1 Rev 2), groundwater flood risk is identified as low on the basis of the information presented on the Flood Map for Planning[3]. The GOV website for providing long term flood risk data[4] was used to obtain information regarding groundwater flood risk for the Scheme, and it is said that flooding from groundwater is unlikely in this area. Measures embedded within the design and management plans of the Scheme, more specifically the **Design Parameters** (Doc Ref. 7.4 Rev 2), **ES Appendix 11-4: Outline Drainage Strategy** [APP-227], **OCEMP** (Doc Ref. |

[3] Flood Map for Planning. Available at: Flood map for planning - GOV.UK. [Accessed 29/07/2026]
[4] Long Term Flood Risk Data. Available at: https://www.gov.uk/check-long-term-flood-risk

| Topic | Matter Raised | Applicant's Response |
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| | | 7.10 Rev 2) and the **Outline Operational Environmental Management Plan (OOEMP)** (Doc Ref 7.11 Rev 1), to mitigate flood risk from worst-case fluvial flood events would also mitigate for any impacts from groundwater flooding. These measures include discharging surface runoff to watercourses and using shallow swales to prevent an increase risk of groundwater flooding, and freeboard levels being set above the fluvial flood risk levels by at least 0.3m which will mitigate against groundwater emergence. As such, no further assessment of groundwater flood risk, or mitigation specifically to address groundwater flooding, is considered to be required.<br><br>Cumulative effects have been considered in Section 11.11 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). |
| Landscape and Visual | | |
| **SHDC-012**<br>Landscape and Visual Matters | The Council has reviewed ES Chapter 12: Landscape and Visual, together with the supporting landscape and visual appendices and figures. The Council does not support the Scheme on landscape and visual grounds. | The Applicant notes this comment. Specific responses to the concerns raised by the Council in relation to landscape and visual matters are provided below. |
| **SHDC-013**<br>Landscape and Visual Matters | The Council acknowledges that the submitted LVIA is supported by a substantial package of baseline material, assessment appendices, ZTVs, viewpoint location plans, representative visualisations and | **ES Chapter 12: Landscape and Visual** [APP-063], together with its supporting appendices, ZTVs, viewpoint assessments and visualisations, provides a comprehensive assessment of the likely landscape and visual effects of the |

| Topic | Matter Raised | Applicant's Response |
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| | additional viewpoints. However, the Council's position is that the Applicant's own assessment demonstrates that the Scheme would give rise to extensive, long-term and significant adverse landscape and visual effects across a broad area of open Fenland landscape. These effects would not be limited to the construction phase, would remain significant at Year 15, and would occur in combination with a growing concentration of nationally significant energy infrastructure within the wider area.<br><br>The Council considers that the scale, nature, duration and cumulative context of these effects weigh heavily against the Scheme. | Scheme in accordance with the methodology set out in the ES. The assessment identifies a range of landscape and visual effects for various receptor groups, including those that are significant, and transparently assesses their extent, duration and cumulative context. The Council's comments do not identify any deficiencies in the LVIA methodology, baseline information or conclusions presented in the LVIA, but rather express the Council's view on the significance and planning weight to be attributed to the assessed effects.<br><br>The Applicant recognises the significant adverse landscape and visual effects and has taken these into account in its planning balance set out within the **Planning Statement** [APP-260]. The Applicant has developed the Scheme proposals to avoid, reduce and mitigate adverse effects through application of the mitigation hierarchy and consideration of good design, but it is the nature of large-scale infrastructure projects that adverse effects cannot always be avoided or fully mitigated. The status of the Scheme as a Critical National Priority (CNP) infrastructure means that residual impacts, including landscape and visual, should not outweigh the urgent need for the Scheme in the planning balance. There are no residual impacts on any of the exceptions listed at paragraph 4.2.98 of EN-1 nor are any exceptional circumstances present that would reverse this presumption. The Applicant maintains its view that |

| Topic | Matter Raised | Applicant's Response |
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| | | while the significant adverse landscape and visual effects reported will attribute some negative weight in the planning balance, the substantial benefits and urgent need for the Scheme outweigh these adverse impacts. |
| **SHDC-014**<br>Landscape Character | The Council is particularly concerned by the effects of the Scheme on the open, low-lying and expansive Fenland landscape. The ES identifies significant residual landscape effects during construction on HLCA 9 The Fens, HLCZ FEN2 The Eastern Fens, HLCA 10 The Wash and HLCZ WSH6 Townlands. These effects arise from the construction of PV modules, BESS, substations, cabling, haul routes, compounds, overhead inter-array infrastructure and the Grid Connection Route steel pylons, together with associated reductions in tranquillity, lighting, traffic and visual intrusion. | The Applicant notes the Council's comments regarding the landscape character effects of the Scheme. The submitted LVIA provides a detailed assessment of landscape effects during construction, operation and decommissioning, including the identification of significant residual effects where these are predicted to occur. The assessment also recognises that, due to the scale and nature of certain permanent infrastructure, significant adverse effects remain for some landscape receptors following the implementation of mitigation. These conclusions are clearly set out in **ES Chapter 12: Landscape and Visual** [APP-063], together with its supporting appendices. |
| **SHDC-015**<br>Landscape Character | The Council considers these effects to be a serious adverse consequence of the Scheme. The affected landscape is characterised by open skies, long-distance views, drainage patterns, large-scale arable fields and a limited amount of vertical enclosure. The Scheme would introduce a large extent of energy infrastructure into this landscape, including solar arrays, substations, BESS compounds, overhead interarray connections and 400kV Grid Connection Route infrastructure. This would | The Council's comments do not identify any deficiencies in the methodology, baseline, or conclusions presented in the LVIA, but instead express the Council's judgement regarding the acceptability and planning weight of the assessed landscape effects.<br><br>The Applicant recognises the significant adverse landscape and visual effects and has taken these into account in its planning balance set out within the **Planning Statement** |

| Topic | Matter Raised | Applicant's Response |
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| | fundamentally alter the perception of large areas of open countryside and would introduce additional industrialising influences into a landscape where openness and long views are key characteristics. | [APP-260]. The Applicant has developed the Scheme proposals to avoid, reduce and mitigate adverse effects through application of the mitigation hierarchy and consideration of good design, but it is the nature of large-scale infrastructure projects that adverse effects cannot always be avoided or fully mitigated. The status of the Scheme as a Critical National Priority (CNP) infrastructure means that residual impacts, including landscape and visual, should not outweigh the urgent need for the Scheme in the planning balance. There are no residual impacts on any of the exceptions listed at paragraph 4.2.98 of EN-1 nor are any exceptional circumstances present that would reverse this presumption. The Applicant maintains its view, that while the significant adverse landscape and visual effects reported will attribute some negative weight in the planning balance, the substantial benefits and urgent need for the Scheme outweigh these adverse impacts. |
| **SHDC-016**<br>Landscape Character | The Council notes that these effects would not be resolved following construction. At Operation Year 1, the ES identifies significant moderate adverse residual effects on HLCA 9 The Fens, HLCZ FEN2 The Eastern Fens, HLCA 10 The Wash and HLCZ WSH6 Townlands. The ES describes effects including land use change, alteration of rural character, intensification of industrial character, reduced openness, increased visual clutter and the dominance of tall pylons on the skyline.<br><br>At Operation Year 15, significant moderate adverse landscape effects would remain for the same key landscape receptors. The Council gives particular weight to the ES acknowledgement that, although mitigation planting would mature, it would not reduce the prominence of tall structures.<br><br>The Council therefore does not agree that the Scheme can be satisfactorily integrated into the landscape. The LVIA demonstrates that the mitigation strategy would not prevent significant adverse effects, and in some respects mitigation | |

| Topic | Matter Raised | Applicant's Response |
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| | planting would itself alter the character and openness of the receiving landscape. | |
| **SHDC-017**<br>Mitigation | The Council is concerned that the Applicant's mitigation strategy is insufficient to address the scale of harm identified in the ES. The ES states that significant landscape and visual effects arise from land use change and the massing of proposed infrastructure, that it will not be possible to fully mitigate those significant effects, and that no additional mitigation is proposed.<br><br>This is a critical point. The Council considers that the inability to fully mitigate the identified significant effects is not merely a technical observation. It is evidence that the Scheme is too large, too intrusive and too infrastructure-heavy for its receiving landscape. | The Applicant notes the Council's comments regarding the proposed mitigation strategy. The Council's summary of the ES landscape mitigation proposals as described in **ES Chapter 12: Landscape and Visual** [APP-063] omits the wider context provided within the LVIA. The LVIA concludes that significant residual landscape and visual effects arise principally from the change in land use and the scale of the proposed infrastructure and recognises that these effects cannot be fully mitigated. However, the LVIA further explains that no additional mitigation is proposed because the scale and functional requirements of the Scheme preclude further screening or landform modification without compromising safety and operational integrity. This should not be interpreted as meaning that landscape and visual mitigation has not been incorporated into the Scheme or is insufficient. Mitigation has been developed iteratively through the design process and includes, amongst other measures, the incorporation of landscape planting associated with the solar development and the consideration of the siting, layout and design of Scheme infrastructure to reduce landscape and visual effects where practicable. The residual effects therefore reflect both the inherent limitations of mitigating infrastructure of this scale and nature and a deliberate |
| **SHDC-018**<br>Mitigation | The Council also notes that mitigation planting is relied upon to reduce some visual effects over time, but this would not address the effects of taller elements, including pylons, overhead line infrastructure and substations. In addition, in a flat Fenland landscape, new planting can reduce openness and alter existing rural character. The Council therefore considers that planting cannot be | |

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| | treated as a complete or adequate solution to the landscape and visual harm arising from the Scheme.<br><br>Where the assessment relies on advanced planting, including assumptions around establishment before construction or early operation, this should be secured through robust DCO requirements. However, even if secured, the Council's position remains that the mitigation would not overcome the fundamental landscape and visual harm identified in the ES. | landscape-led approach that avoids introducing mitigation measures which could themselves result in additional adverse effects on the characteristic openness and landscape pattern of the Fens..<br><br>The landscape and visual effects associated with the proposed 400kV overhead transmission infrastructure are, to a significant degree, inherent in its height, scale and function, and it will therefore remain visible notwithstanding appropriate mitigation. This is already the case for existing 400kV overhead transmission infrastructure located within the study area which is clearly visible and forms part of the existing landscape and visual context. The Scheme would intensify the presence of this type of infrastructure in parts of the study area but would not introduce an entirely new infrastructure typology.<br><br>Further mitigation cannot necessarily be assumed to result in a reduction in landscape and visual effects. The mitigation strategy has been specifically developed to balance the benefits of screening and landscape integration against the potential effects of introducing additional vegetation into the open Fenland landscape. Extensive or continuous screening belts, woodland planting or landform modification could introduce patterns of enclosure that are uncharacteristic of the open, low-lying landscape and would themselves give rise to adverse landscape and visual effects. The strategy therefore seeks to provide targeted |

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| | | screening and landscape integration where appropriate, whilst retaining the characteristic openness and landscape pattern of the receiving landscape as far as practicable. The presence of significant residual effects, particularly in relation the proposed 400kV overhead transmission line, does not in itself demonstrate that the Scheme is too large or intrusive for its receiving landscape. Rather, these effects reflect the inherent characteristics of the infrastructure and the consequences of introducing infrastructure of this nature.<br><br>This is consistent with paragraph 2.9.11 of EN-5 which recognises that "*mitigation of the landscape and visual impacts arising from overhead lines and their associated infrastructure is usually possible, it may not always be so, and the impossibility of full mitigation in these cases does not countermand the need for overhead lines*". The Applicant acknowledges that mitigation planting cannot screen all elements of the Scheme, particularly taller infrastructure such as pylons, overhead lines and substations. However, planting is not relied upon as a complete solution to the landscape and visual effects of the Scheme, nor would maximising screening necessarily represent appropriate mitigation within this landscape. The extent and form of planting have been developed to provide targeted screening and landscape integration whilst avoiding extensive new vegetation patterns that would themselves |

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| | | adversely affect the characteristic openness of the Fenland landscape.<br><br>Please see the Applicant's position on the weighting of significant adverse landscape and visual impacts within the planning balance in the above text.<br><br>Where advanced planting has been proposed, this is secured through the **OLEMP** (Doc Ref. 7.16 Rev 1), as described in Section 4.2 of the document and indicatively shown on Annex A: Outline Landscape Masterplan.<br><br>The definition of "*permitted preliminary works*" within the **Draft DCO** (Doc Ref. 3.1 Rev 2) includes at limb (i) "*advanced planting to allow for an early establishment of protective screening*", thereby ensuring that these works can be undertaken in advance of the main construction works.<br><br>The delivery, maintenance and management of landscape and ecological mitigation are secured through Requirement 7 (Landscape and Ecology Management Plan) of the **Draft DCO** (Doc Ref. 3.1 Rev 2), which requires a Landscape and Ecology Management Plan to be submitted to and approved by the relevant planning authority prior to commencement of the relevant part of the authorised development. The approved plan must be substantially in accordance with the **OLEMP** (Doc Ref. 7.16 Rev 1) and must be implemented as approved, and subsequently maintained throughout operation of the Scheme. |

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| | | Requirement 7 expressly provides that "commence" for these purposes includes limb (i) of the permitted preliminary works (advanced planting to allow for an early establishment of protective screening), thereby ensuring that these works are undertaken in accordance with the approved Landscape and Ecology Management Plan.<br><br>The Applicant therefore considers that the D**raft DCO** (Doc Ref. 3.1 Rev 2) contains appropriate provisions to secure the implementation and maintenance of the landscape mitigation relied upon in the Environmental Statement (ES). |
| **SHDC-019**<br>Visual Effects | The Council is concerned by the number, extent and severity of significant adverse visual effects identified in the ES. The ES identifies significant adverse effects at a wide range of representative viewpoints, including views experienced by recreational users, residents, road users and users of the local public rights of way network. These effects occur in relation to the Solar Development Areas, the On-Site 400kV Substation and BESS Compound, the overhead inter-array connections and the Grid Connection Route. | The Applicant notes the Council's comments regarding the visual effects of the Scheme. Detailed responses to comments raised are provided in rows below. |
| **SHDC-020**<br>Visual Effects | Particular concern is raised in relation to Viewpoint 3, from PRoW Crow/7/1 on the northwestern edge of Parcel A, where the ES identifies a Major Adverse significant effect at construction, Year 1, Year 15 | **ES Appendix 12-6 Visual Assessment** [APP-240] identifies major adverse visual effects for Viewpoint 3 at Construction, Year 1, Year 15 and Decommissioning. It is representative for recreational users along sections of |

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| | and decommissioning. This demonstrates that for some public rights of way users, the Scheme would result in a severe and long term deterioration in visual amenity. | PRoW Crow/7/1 on the northwestern edge of Parcel A, and represents what an elevated view into the Site with limited opportunities for landscape mitigation will experience. It is not representative for other PRoW located within the study area due to its elevated nature and close proximity to the Scheme. Viewpoint 3 is the only viewpoint where major adverse visual effects have been identified for PRoW users on a section of a recreational route, as mitigation opportunities in this location are limited due to the elevated nature of this viewpoint and the close proximity to Parcel A. |
| **SHDC-021**<br>Visual Effects | The Council is also concerned by Viewpoint 14, from Langary Gate Road south of Langary Gate Farm. The ES acknowledges that construction activity would be visible adjacent to the viewpoint and would occupy the majority of the view. At Year 1, the Solar Development Area and solar station would be visible at close range, occupy the horizontal extent of the view, become dominant, obstruct views into the distance and change the composition of the view. The ES identifies a Major Adverse significant effect. | The Council's comment in relation to Viewpoint 14 does not reflect the full conclusions of the LVIA as found in **ES Appendix 12-6: Visual Assessment** [APP-240]. The assessment of Viewpoint 14 concludes that following the establishment of mitigation planting the significance of effects reduced from major adverse to moderate adverse, demonstrating the effectiveness of the landscape mitigation planting over time. It is further noted that this Viewpoint is located at a gap of existing roadside shrubs and trees which obscure currently open views to either side of Viewpoint 14. The proposed mitigation planting would continue the pattern of the existing roadside vegetation, which would result in a closure of this gap and therefore the open view. The assessment for Year 15 states "... *Closing this gap is not uncharacteristic and aligns with existing* |

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| | | *adjacent road side vegetation along this section of Langary Gate Road. While the Scheme would not be prominent anymore, the landscape mitigation would screen the view. It does, however, provide a soft edge to Land Parcel D in this location ...*". It is therefore the vegetation closing the gap and screening the Scheme, which results in moderate (significant) visual effects at Year 15. |
| **SHDC-022**<br>Visual Effects | The Council considers that these findings illustrate a wider issue. The Scheme would not simply be glimpsed or filtered in the landscape. It would be experienced as a dominant and extensive infrastructure development from a number of public and residential receptor locations. | The Applicant does not agree with the conclusion that the Scheme would be experienced as a dominant and extensive infrastructure development from a number of public and residential receptor locations. This conclusion is overly simplistic and does not reflect the varied findings of the LVIA as set out in **ES Chapter 12: Landscape and Visual** [APP-063]. Viewpoints 3 and 14 were selected as close range viewpoints from a specific location along a PRoW (receptor group: recreational users) and a local road network (receptor group: road users). As per **ES Appendix 12-5: Visual Baseline** [APP-239], neither represents a residential receptor. |
| **SHDC-023**<br>Grid Connection Route and overhead line infrastructure | The Council has serious concerns regarding the Grid Connection Route. The ES identifies significant adverse effects associated with the Grid Connection Route across a number of viewpoints, including Viewpoints 20, 21, 27, 30, LCC8, LCC9 and LCC10. These effects persist into Operation Year 15. | **ES Chapter 12: Landscape and Visual** [APP-063] has considered the landscape and visual effects of the increase in infrastructure of a predominantly rural area and change of use of agricultural land, as set out within **ES Appendix 12-4: Landscape Assessment** [APP-238] and **ES Appendix 12-6: Visual Assessment** [APP-246]. |

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| **SHDC-024**<br>Grid Connection Route and overhead line infrastructure | The 400kV overhead line infrastructure would introduce substantial vertical elements into a flat and open landscape where skyline features are highly perceptible. The Council considers that the overhead line infrastructure would intensify the industrialisation of the landscape and would compound the adverse effects of the solar and substation elements of the Scheme. | Cumulative landscape and visual effects with other developments are set out within **ES Appendix 12-7** [APP-241] and summarised within Section 12.11 of **ES Chapter 12: Landscape and Visual** [APP-063]. Following the construction of the cumulative schemes, the additional cumulative effect introduced by the Scheme 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.<br><br>The Scheme design has been developed to take into account the proximity of receptors and to reduce the perceived industrialisation of the area. The Applicant has sought to minimise effects on residential properties, as far as reasonably practicable, through the routeing and design of the overhead lines within the Grid Connection Route and the Inter-Array Connection. During design development, buffers were situated around residential properties in order to align the overhead lines away from them as much as practicable.<br><br>Setbacks are secured within the **Works Plans** [APP-009 to APP-010] and the **OLEMP** (Doc Ref. 7.16 Rev 1) to maintain an appropriate distance between the infrastructure and residential receptors within the Solar Development Areas. Planting and Habitat Management |
| **SHDC-025**<br>Grid Connection Route and overhead line infrastructure | The Council remains concerned that the use of overhead line infrastructure has not been adequately justified from a landscape and visual perspective. The ES records that LCC previously raised concern that overhead cabling and pylons are likely to create additional and wider adverse visual effects compared with underground cabling. The Applicant's response refers to alternatives and design evolution documentation, but the Council remains of the view that the landscape and visual consequences of the overhead line solution are severe and weigh against the Scheme. | |

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| | | Areas are proposed within the vicinity of residential properties to reduce visual effects.<br><br>The Applicant notes the Council's comments regarding the visual effects of the Grid Connection Route. The selection of an overhead line as the preferred technology for the grid connection is guided by national policy contained in the National Policy Statement for Electricity Networks, EN-5, which states that the Government's position is that outside of nationally designated landscapes, overhead lines should be the strong starting presumption for electricity networks in general unless these would give rise to particularly significant landscape and visual effects.<br><br>**ES Chapter 3: Alternatives and Design Evolution** [APP-054], Table 3-2 compares the potential environmental effects from the construction of an underground cable and overhead line for the Grid Connection for each discipline. It concludes the following for landscape and visual effects "*For both landscape and visual receptors. an underground cable would largely avoid the presence of permanent above ground infrastructure and is therefore expected to give rise primarily to effects associated with construction, and these would be temporary and localised in nature*". However, section 3.5.28 goes on to conclude that "*With due regard to the environmental effects, the receptors that may experience likely residual significant effects from an overhead line are landscape and visual receptors, and designated heritage assets* |

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| | | *due to changes to their setting. In relation to an underground cable solution, potential effects on buried archaeological deposits may be extensive depending on the location of the trenching. 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>Where major adverse effects are identified within **ES Chapter 12: Landscape and Visual** [APP-063], these relate to the prevalence of Solar Development Area infrastructure rather than owing to the presence of Grid Connection Route infrastructure. All landscape and visual effects reported with respect to Grid Connection Route infrastructure are moderate adverse effects. The cumulative effects assessment does not report an increase in the significance of the adverse effects as a result of additional overhead line infrastructure associated with the Grimsby to Walpole and Weston Marsh to East Leicestershire overhead line projects. No significant adverse effects have been specifically identified in relation to the presence of the overhead Inter-Array Connection Area infrastructure (also classed as an NSIP).<br><br>While there is no definition within EN-5 as to what may be deemed particularly significant, the Applicant has understood this to be those effects that exceed moderate adverse significance, which is not the case for the overhead |

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| | | line infrastructure, including in the cumulative effects assessment. Additionally, there is no specific segment of the Grid Connection Route where greater landscape or visual effects are reported.<br><br>On this basis, the Applicant concludes that the Scheme does not cross any part of a nationally designated landscape that would reverse this presumption, nor are the landscape and visual effects of the overhead lines reported in **ES Chapter 12: Landscape and Visual** [APP-063] deemed to be so significant that undergrounding should be given thorough consideration as a viable alternative in accordance with paragraph 2.9.14 of EN-5.<br><br>The Applicant has therefore adopted an approach that is consistent with national policy, taking into account the balance between visual effects, technical feasibility, environmental considerations and the urgent national need to deliver new electricity network infrastructure to support decarbonisation and energy security. |
| **SHDC-026**<br>Residential visual amenity | The Council notes that a Residential Visual Amenity Assessment was not undertaken. The ES records that LCC requested a Residential Visual Amenity Survey, but the Applicant concluded that the Scheme would not reach the threshold at any property where residential visual amenity becomes a material consideration. | A description of the approach to RVAA is provided in **ES Chapter 12: Landscape and Visual** [APP-063], Section 12.4 and paragraphs 12.8.45 – 12.8.53.<br><br>It is important to distinguish between significant visual effects, which are routinely assessed through a LVIA, and the circumstances that justify a RVAA. The former does not automatically imply the latter, and the Landscape Institute's |

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| **SHDC-027**<br>Residential visual amenity | The Council does not consider this position to be adequately justified. The Scheme includes extensive solar development, substations, BESS infrastructure and 400kV overhead line infrastructure, with significant effects identified at a number of viewpoints representative of residential outlook. The ES itself concludes that significant effects will arise beyond Operation Year 15 for representative views reflecting residential receptors, even though it concludes that those effects would not reach the RVAA threshold. | '*Technical Guidance Note 2/19: Residential Visual Amenity Assessment*' (TGN 2/19)[5] expressly recognises this distinction. It states that "*LVIA findings of significant (adverse) effects on outlook and /or on visual amenity at a residential property do not automatically imply the need for a RVAA*". TGN 2/19 notes that there is a misconception that a significant effect identified in the LVIA adjacent to a property will also potentially lead to reaching the Residential Visual Amenity Threshold.<br><br>TGN 2-19 suggests that a RVAA may be recommended in circumstances where, for example, a development would be "'*blocking the only available view from a property*', *or* '*overwhelming views in all directions*'; *and* '*unpleasantly encroaching*' *or being* '*inescapably dominant from the property*'".<br><br>The LVIA contained in **ES Chapter 12: Landscape and Visual** [APP-063], paragraphs 12.8.45 – 12.8.53 and its associated figures and appendices has listed properties adjacent or close to the Solar Development Area Parcels A – D and within 500m of the Grid Connection Route. It describes where offsets have been applied to move solar arrays away from residential properties. It further lists |
| **SHDC-028**<br>Residential visual amenity | Given the scale and proximity of elements of the Scheme to residential receptors, and the acknowledged significant effects on representative residential views, the Council considers that a more precautionary approach should have been taken. A property specific Residential Visual Amenity Assessment should be provided for those dwellings most likely to experience close-range or open views of the solar arrays, substations, BESS compounds, overhead inter-array infrastructure and the Grid Connection Route. | |

[5] Landscape Institute (2019). Residential Visual Amenity Assessment. Technical Guidance Note 2/19.

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| | | criteria considered when judging visual effects for viewpoints related to residential receptors and contain views of elements of the Scheme. TGN 2-19 specifically notes that, for overhead transmission lines, "*generally only those properties within 100 – 150 metres of the finalised route*" are potentially candidates for an RVAA.<br><br>The Scheme was iteratively designed to avoid overbearing and intrusive design in particular for residential receptors through off-set distances from residences adjacent to the Solar Development Area, refinement of solar development parcels and pylon locations, and the incorporation of landscape mitigation. Proposed landscape mitigation is to soften the boundaries of the Solar Development Area, particularly in locations where views from residential properties may occur.<br><br>Consequently, no residential property was identified where impact of the Scheme had the potential to reach the Residential Visual Amenity Threshold. The Scheme would not block the only available view, overwhelm views in all directions, or become an inescapably dominant feature of residents' views. Existing semi-mature or mature garden and / or boundary vegetation, property orientation, separation distances and, where relevant, the presence of existing overhead transmission infrastructure, all moderate the extent of visual influence. |

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| | | The decision not to prepare a standalone RVAA was therefore a reasoned professional judgement, based on applicable guidance, the design evolution of the Scheme, and the findings of the LVIA. Furthermore, a separate RVAA would not have provided materially different evidence to that already presented. The representative residential viewpoints, visualisations and detailed assessment of residential visual effects enable the decision-maker to determine whether the Scheme would result in an overwhelming visual effect on residential visual amenity. The information submitted on visual effects is therefore considered proportionate, robust and sufficient to inform the planning decision, consistent with the principles of GLVIA3[6], TGN 2/19[5] and the EIA Regulations[7]. |
| **SHDC-029**<br>Cumulative effects | The Council is particularly concerned by cumulative landscape and visual effects. The Scheme is not being proposed in isolation. It would form part of a rapidly changing energy infrastructure landscape that includes other substantial schemes, including | The Applicant notes the Council's comments regarding cumulative landscape and visual effects.<br><br>The cumulative assessment has been undertaken in accordance with the principles set out in Guidelines for |

[6] Landscape Institute. Institute of Environmental Management & Assessment. 2013. Guidelines for Landscape and Visual Impact Assessment. Third Edition. Available as hard copy only.
[7] Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Available at: https://www.legislation.gov.uk/uksi/2017/572/contents [Accessed 23/08/2026]

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| | Grimsby to Walpole, Weston Marsh to East Leicestershire and other energy-related projects. | Landscape and Visual Impact Assessment, Third Edition (GLVIA3)[6] and the Landscape Institute Technical Guidance Note LITGN-2024-01: Notes and Clarifications on Aspects of GLVIA3[8]. These distinguish between the additional cumulative effects attributable to the proposed development and the overall cumulative effects arising from the totality of existing, consented and reasonably foreseeable developments.<br><br>In accordance with this guidance, **ES Appendix 12-7: Landscape and Visual Cumulative Assessment** [APP-241] assesses both the additional contribution of the Scheme and the total cumulative landscape and visual effects. The ES therefore does not rely solely on an assessment of the Scheme's incremental contribution. It also identifies those landscape receptors where the totality of cumulative development would result in significant cumulative effects, including HLCA 10 The Wash, HLCZ WSH6 Townlands and HLCZ WSH4 Reclaimed Wash Farmlands.<br><br>The distinction between the Scheme's additional cumulative contribution and the overall cumulative change |
| **SHDC-030**<br>Cumulative effects | The cumulative assessment acknowledges that the totality of effects of cumulative schemes, including the Scheme, would result in Moderate Adverse significant effects in relation to HLCA 10 The Wash, HLCZ WSH6 Townlands and HLCZ WSH4 Reclaimed Wash Farmlands during both construction and operation. | |
| **SHDC-031**<br>Cumulative effects | The Council is concerned that the Applicant places too much emphasis on the "additional" cumulative effect of Meridian Solar Farm being minor or not significant when considered against a cumulative baseline that already includes substantial energy infrastructure. This approach risks underplaying the real-world experience of communities and landscape receptors. Local residents, public rights of way users and road users would experience the combined totality of infrastructure in the landscape, not an abstract separation between the Scheme's | |

[8] Landscape Institute and Institute of Environmental Management and Assessment (2024). Notes and Clarifications on Aspects of Guidelines on Landscape and Visual Impact Assessment Third Edition (GLVIA3), Technical Guidance Note LITGN-2024-01. Available at: https://www.landscapeinstitute.org/wp-content/uploads/2024/08/LITGN-2024-01-GLVIA3-NC_Aug-2024.pdf [Accessed 04/12/2025]

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| | individual contribution and the wider cumulative picture. | is an important principle of LVIA methodology. Whilst receptors experience the combined presence of multiple developments, the assessment also identifies the extent to which the proposed Scheme contributes to those cumulative effects. The ES presents both assessments transparently to inform the decision-maker, recognising that the overall cumulative change cannot be attributed solely to the Scheme.<br><br>The Applicant therefore considers that the cumulative assessment appropriately and proportionately presents both the total cumulative effects experienced by receptors and the additional cumulative effects arising from the Scheme, consistent with established LVIA guidance.<br><br>The Applicant recognises the significant adverse landscape and visual effects, including the totality of the cumulative effects, and has taken these into account in its planning balance set out within the **Planning Statement** [APP-260]. The Applicant has developed the Scheme proposals to avoid, reduce and mitigate adverse effects through application of the mitigation hierarchy and consideration of good design, but it is the nature of large-scale infrastructure projects that adverse effects cannot always be avoided or fully mitigated. The status of the Scheme as a CNP infrastructure means that residual impacts, including landscape and visual, should not outweigh the urgent need for the Scheme in the planning balance. There are no |
| **SHDC-032**<br>Cumulative effects | The Council considers that the cumulative effects of the Scheme are unacceptable. The Scheme would contribute to a broader pattern of landscape industrialisation and infrastructure intensification within the Fens. The cumulative effect would be particularly harmful because the receiving landscape is open, low-lying and visually exposed, with long views and limited containment. | |

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| | | residual impacts on any of the exceptions listed at paragraph 4.2.98 of EN-1 nor are any exceptional circumstances present that would reverse this presumption. The Applicant maintains its view that while the significant adverse landscape and visual effects reported will attribute some negative weight in the planning balance, the substantial benefits and urgent need for the Scheme outweigh these adverse impacts. |
| **SHDC-033**<br>Future baseline | The Council considers that the future baseline is insufficiently developed. The ES future baseline is limited and states, in broad terms, that the landscape and visual baseline would remain broadly as described, with additional built development around some settlements. In the Council's view, this does not adequately acknowledge the pace and scale of energy infrastructure change in the wider area. The future baseline and cumulative assessment should be read together, but the Council considers that the future baseline section itself understates the extent to which the receiving landscape is already under pressure from multiple infrastructure proposals. | In accordance with the EIA Regulations[7], the future baseline section of **ES Chapter 12: Landscape and Visual** [APP-063] was intended to provide a concise description of the likely evolution of the landscape character and visual amenity baseline in the absence of the Scheme, including planned growth associated with allocations identified in the South East Lincolnshire Local Plan. Whilst it does not specifically refer to the wider programme of proposed energy infrastructure within the study area, it does note that "*built development within the study area would increase*".<br><br>The cumulative assessment included in **ES Appendix 12-7: Landscape and Visual Cumulative Assessment** [APP-241] considered the interaction of the Scheme with committed and reasonably foreseeable developments, including other energy infrastructure proposals, and assessed the resulting cumulative landscape and visual effects in accordance with the adopted methodology. As such, the relevant developments were fully considered within the ES and |

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| | | informed the assessment of cumulative landscape and visual effects. The Applicant agrees with the Council's comment that the future baseline and cumulative assessment should be read together.<br><br>The Applicant therefore considers that the ES provides an appropriate assessment of both the anticipated future baseline and the cumulative effects of the Scheme. |
| **SHDC-034**<br>Seasonal photography and visualisations | The Council notes that winter photography was not available at ES submission for viewpoints added following statutory consultation and is to be submitted by Deadline 1. The Council reserves its position on any further or amended comments arising from that material. | Summer and winter photography for Viewpoints 1, 3, 4, 6, 7, 10, 11, 16 and 18–20 [APP-131 to APP-137] was submitted with the DCO Application. Baseline summer and winter comparison photosheets for the remaining Viewpoints 2, 5, 8, 9, 12–15, 17, 21–29 and LCC 1–LCC 11, where winter photography had not previously been provided at with the DCO Application, have been provided within the **Additional Winter Photography Technical Note** (Doc Ref. 8.8) submitted at Deadline 1. |
| **SHDC-035**<br>Seasonal photography and visualisations | The Council also notes that cumulative project models are described as indicative in the visualisation material. Given the importance of cumulative effects to the Council's position, the Council considers that any uncertainty in cumulative visualisation should not be used to reduce the weight given to likely cumulative harm. Rather, where uncertainty remains, a precautionary approach should be applied. | The cumulative visualisations have been prepared using the best available information at the time of the assessment, including the Grimsby to Walpole and WMEL project models. Whilst they are described as indicative, they represent the most accurate depiction of the cumulative scenario that could be prepared based on the available information at that time. This position does not affect the weight that has been given to any identified cumulative effects. The assessment of cumulative effects has followed |

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| | | a precautionary approach, to determine the likely worst-case effects. The use of the term 'indicative' reflects that the design for other projects may continue to evolve. |
| **SHDC-036**<br>Conclusions | The Council does not support the Scheme on landscape and visual grounds. The submitted ES demonstrates that the Scheme would result in extensive significant adverse landscape and visual effects during construction, operation and decommissioning. Significant effects would remain at Operation Year 15, including effects on key Fenland landscape receptors and a wide range of visual receptors. The ES also acknowledges that significant landscape and visual effects cannot be fully mitigated and that no additional mitigation is proposed. | The Applicant recognises the significant adverse landscape and visual effects, including the totality of cumulative effects, and has taken these into account in its planning balance set out within the **Planning Statement** [APP-260]. The Applicant has developed the Scheme proposals to avoid, reduce and mitigate adverse effects through application of the mitigation hierarchy and consideration of good design, but it is the nature of large-scale infrastructure projects that adverse effects cannot always be avoided or fully mitigated. The status of the Scheme as a CNP infrastructure means that residual impacts, including landscape and visual, should not outweigh the urgent need for the Scheme in the planning balance. There are no residual impacts on any of the exceptions listed at paragraph 4.2.98 of EN-1 nor are any exceptional circumstances present that would reverse this presumption. The Applicant maintains its view that while the significant adverse landscape and visual effects reported will attribute some negative weight in the planning balance, the substantial benefits and urgent need for the Scheme outweigh these adverse impacts. |
| **SHDC-037**<br>Conclusions | The Council considers that the Scheme would cause unacceptable harm to the character, openness and visual amenity of the Fenland landscape. The Council is particularly concerned by the scale of solar development, the BESS and substation infrastructure, the overhead inter-array connections, the 400kV Grid Connection Route, the persistence of significant residual effects, and the cumulative interaction with other major energy infrastructure schemes. | |

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| Noise and Vibration | | |
| **SHDC-038**<br>Noise & Vibration – operational phase | The current soundscape is characterised by a very low baseline noise level. The proposed development will alter the soundscape locally for residential receptors, particularly overnight. We are most concerned about those locations where moderate adverse effects, which are significant, are predicted. The NPSE says 'significant adverse effects on health and quality of life should be avoided'. | Following the implementation of mitigation, no significant residual operational noise effects are predicted during operation of the Scheme. The assessment therefore demonstrates compliance with the NPSE objective of avoiding significant adverse effects on health and quality of life from environmental noise.<br><br>Although Receptor Groups (RG) RG04, RG05, RG40, RG42, RG44, RG45, RG48, RG53 and RG54 are predicted to experience moderate adverse (significant) effects during the operational phase of the Scheme prior to the application of design mitigation for noise, the proposed mitigation outlined in paragraphs 13.9.9 to 13.9.14 and 13.9.15 to 13.9.19 of **ES Chapter 13: Noise and Vibration** [APP-064] would reduce residual operational noise effects at these receptors during the night-time to minor adverse and not significant.<br><br>The predicted noise levels inclusive of mitigation are committed to as noise limits (presented in Table 13-29) to avoid significant effects during operation of the Scheme. These noise limits are secured through the **OOEMP** (Doc Ref. 7.11 Rev 1) and Requirements 13 and 18 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). As such, no moderate adverse (significant) residual operational effects are identified. |

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| **SHDC-039**<br>Noise & Vibration – operational phase | 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 to as low as reasonably practicable. | The indicative Scheme layout has been developed taking account of noise considerations and, where practicable, seeks to maximise separation distances between noise-generating infrastructure and sensitive receptors. In addition, the Scheme includes commitments to adopt low-noise substation transformers and BESS equipment where necessary and reasonably practicable to achieve the assessed noise levels. Noise-reducing design measures for the overhead line would also be incorporated where necessary and reasonably practicable. Collectively, these measures represent the application of good acoustic design principles to minimise operational noise effects as far as reasonably practicable. These measures are a commitment secured through the **OOEMP** (Doc Ref. 7.11 Rev 1) and the implementation of the measures set out in the **OOEMP** is secured through Requirement 13 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). Requirement 18 additionally requires an operational noise assessment to be undertaken, and the mitigation measures identified in that assessment to be implemented and maintained throughout operation of the authorised development. |
| **SHDC-040**<br>Noise & Vibration – operational phase | Should the development be approved, we would request Requirement 18 of the Draft DCO to be modified to include a written validation report, including monitoring, to ensure compliance, and also | The Applicant notes the Council's request for amendments to Requirement 18 of the **Draft DCO** (Doc Ref. 3.1 Rev 2).<br><br>Requirement 18 already requires the submission and approval of an Operational Noise Assessment prior to commencement of the relevant parts of the authorised |

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| | an option for subsequent validation testing after significant plant replacement in the future. | development and requires the approved mitigation measures to be implemented and maintained throughout operation. The Applicant considers that Requirement 18 provides an appropriate mechanism to secure compliance with the operational noise limits assessed in the Environmental Statement.<br><br>Table 3-10 of the **OOEMP** (Doc Rev. 7.11 Rev 1) includes a commitment to undertake operational noise monitoring to verify compliance with the noise levels presented in **ES Chapter 13: Noise and Vibration** [APP-064]. Monitoring locations will be agreed with the relevant stakeholder during detailed design and measurements undertaken once the Scheme is operational.<br><br>With regard to significant plant replacement, Table 3-10 of the **OOEMP** (Doc Rev. 7.11 Rev 1) includes a commitment to undertake noise monitoring of the substation transformers, inverters and BESS as part of the annual maintenance regime. Where monitoring indicates that operational noise levels generated by the Scheme have increased above those assessed in the ES, the Undertaker will liaise with the relevant planning authority regarding any appropriate maintenance, investigation or mitigation measures. In addition, should a noise complaint be received from a neighbouring receptor, the Undertaker would liaise with the relevant planning authority regarding the need for further monitoring and, where appropriate, undertake |

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| | | additional measurements of the relevant plant at locations and times agreed with the relevant planning authority. |
| **SHDC-041**<br>Noise & Vibration – construction phase | Some major adverse and significant effects are currently predicted during some phases of construction. We would seek to ensure these are minimised though exploring the most appropriate construction methods, and to minimise the duration of those works as far as reasonably practicable. | The Applicant's assessment of construction noise effects is presented in Section 13.8 and Section 13.10 of **ES Chapter 13: Noise and Vibration** [APP-064]. Significant residual construction noise effects may occur at Receptor Group 53 if Horizontal Directional Drilling (HDD) works run into the night-time based on safety risks with stopping and starting the drilling process, however this will be avoided where practicable.<br><br>Measures to mitigate construction noise impacts are included within the **OCEMP** (Doc Ref. 7.10 Rev 2). These represent Best Practicable Means (BPM) and the most appropriate construction methods for reducing construction emissions. In addition, mitigation includes the following:<br><br>• Depending on the location, plant and timing of works, temporary acoustic fencing will be installed around noise generating plant, as reasonably practicable, to screen receptors from noise emissions. Potential HDD works located between 100 m and 250 m from a sensitive receptor may require temporary acoustic fencing to fully screen noise-generating plant in order to avoid significant noise effects. |

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| | | • Due to uncertainty in the overhead line routing of neighbouring cumulative developments (ID5 and ID13), the Scheme needs to consider the alternative option of undergrounding the overhead line between High Road and the proposed Weston Marsh B Substation, which is facilitated through Work Number 14 of the **Draft DCO** (Doc Ref. 3.1). Sensitive receptors located within 100 m of any potential HDD works would be likely to experience significant noise effects even following implementation of reasonable and practicable mitigation. Accordingly, no HDD works will take place within 100 m of a residential receptor north of High Road.<br><br>Construction-phase controls are secured through Requirement 12 (Construction Environmental Management Plan) of the **Draft DCO** (Doc Ref. 3.1 Rev 2). The Construction Environmental Management Plan must be substantially in accordance with the **OCEMP** (Doc Ref. 7.10 Rev 2) and approved by the relevant planning authority prior to commencement of the relevant part of the authorised development. |
| Socio-Economics and Land Use | | |

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| **SHDC-042**<br>Community benefits assessment | Previously it was requested that the applicant provided detail on how the development would benefit the local population, including proposed community benefits. The Environmental Statement however provides no assessment with further information stated as within the Planning Statement document. This statement details at paragraph 4.3.17 that approximately £500,000 per year of operation of the scheme is proposed if consent is gained. Without the proper assessment of the community funding and formal agreement within the examination process, there is no guarantee to the Council that sufficient offsets have been provided for. | While it does not form part of the DCO Application, the Applicant is committing to a Community Benefit Fund of approximately £500,000 per year of operation of the Scheme (up to £20 million in total assuming a 40-year operational period), should the Scheme gain consent. The fund is not linked to the effects reported within the Environmental Statement as it is not considered mitigation or compensation (which are separately provided and secured as part of the DCO Application).<br><br>The Applicant will work with the local authorities and parish councils to further develop its Community Benefit Fund proposals. |
| **SHDC-043**<br>Agricultural supply chain and local jobs | The agricultural land use loss for the development is not sufficiently assessed, with significant local impacts expected from the loss of large areas of arable land, seriously affecting the agricultural supply chain of South Holland. The lack of direct jobs from the development is considered concerning with only 5 net local jobs proposed during the 40 year operational lifespan. Further work is needed to invest in local apprenticeships and supply chains to compensate for the lack of direct jobs on the development. | It is acknowledged that the ES does not include a specific assessment of effects on businesses along the wider agricultural supply chain. However, **ES Chapter 14: Socio-Economics and Land Use** [APP-065] assesses the likely impacts on agricultural employment and concludes that there would be no loss of agricultural employment arising from the construction and operation of the Scheme. The agricultural land within the Solar Development Area would continue to generate income for the landowners, and as the land is not farmed by tenants, would not result in any loss of jobs. There may be some contractors who undertake some farming activities on the land, but it is very likely that |

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| | | such contractors would not be entirely reliant on these farms for employment. As outlined within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1), the Scheme will permanently impact approximately 34 hectares of BMV land; it is not considered that this impact can be reasonably expected to lead to a significant local impact on the agricultural supply chain.<br><br>Areas of agricultural land within the Grid Connection Route and Inter-Array Connections would experience minimal effects (limited to the bases of overhead pylons and CSECs) and would consequently not have their current agricultural activities altered enough to result in the loss of agricultural employment. Given this conclusion that no loss of agricultural employment is anticipated, and that the majority of affected landowners within the Grid Connection Route and Inter-Array Connections would not experience any substantial change to their farming activities, it is considered reasonable to conclude that the Scheme would not have a significant effect on the wider agricultural supply chain.<br><br>In relation to job creation associated with the Scheme, it is acknowledged that this is relatively limited in respect of the operational phase. However, the **Outline Skills, Supply Chain and Employment Plan** (Doc Ref. 7.17 Rev 1) provides a framework for maximising opportunities for the local supply chain and upskilling local residents. Further details of |

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| | | the approaches and commitments to securing these local benefits will be laid out within the detailed Skills, Supply Chain, and Employment Plan, which must be prepared and approved prior to commencement and subsequently implemented as approved in accordance with Requirement 20 (Skills, Supply Chain and Employment) of the **Draft DCO** (Doc Ref. 3.1 Rev 2). As set out in Table 14-23 within **ES Chapter 14: Socio-Economics and Land Use** [APP-065], it is estimated that of the 11 FTE net jobs created during the operational phase, five will be taken up by workers living within the 60-minute drive time, but this estimate assumes a leakage rate of 60%. There is potential for leakage of economic benefits out of the local impact area to be reduced, and for take-up of jobs by local workers to be increased, through the detailed Skills, Supply Chain, and Employment Plan, as noted above. |
| **SHDC-044**<br>Local economic and social benefits | 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. | This comment is noted. The **Outline Skills, Supply Chain and Employment Plan** (Doc Ref, 7.17 Rev 1) provides a framework for maximising local employment, opportunities for the local supply chain, and upskilling local residents. Further details of the approaches and commitments to securing these local benefits will be laid out within the detailed Skills, Supply Chain, and Employment Plan, which must be prepared and approved prior to commencement and subsequently implemented as approved in accordance with Requirement 20 (Skills, Supply Chain and Employment) |

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| | | of the **Draft DCO** (Doc Ref. 3.1 Rev 2). As summarised in **ES Chapter 10: Human Health** [APP-061], the Scheme will also deliver a permissive path connecting existing Public Rights of Way between Queens Bank and Shepeau Stow, providing opportunities for recreation, physical activity and improved connectivity for pedestrians, cyclists and horse riders.<br><br>Separate to the ES, 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. |
| Traffic and Transport | | |
| **SHDC-045**<br>Highways authority comments | Lincolnshire County Council act as highways authority and may comment directly to the proposed development. Notwithstanding this, having reviewed the information put forward, the approach taken appears reasonable in the methodology but have the following comments to offer. | The Applicant welcomes SHDC's comments and has responded to each one below. |

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| **SHDC-046**<br>Construction traffic management plan | Only an outline construction management plan has been provided with a detailed plan to be provided post-consent. This is not considered appropriate for a development of this scale with mitigation measures needing to be assessed at examination. Without assessment the Council cannot assess the effectiveness and therefore the harm of the development which many have concerns about. | The Applicant notes the Council's comments regarding the use of outline management plans and the provision of detailed management plans post-consent.<br><br>The approach adopted in the **Draft DCO** (Doc Ref. 3.1 Rev 2) is typical of nationally significant infrastructure projects, whereby framework or outline management plans are submitted and assessed as part of the application, with detailed plans being prepared and approved following consent. The **Draft DCO** (Doc Ref. 3.1 Rev 2) secures this through a series of requirements, including Requirements 12 (Construction Environmental Management Plan), 13 (Operational Environmental Management Plan), 15 (Construction Traffic Management Plan) and other management plan requirements.<br><br>The detailed plans submitted pursuant to those requirements must be substantially in accordance with the corresponding certified outline plans and must be approved by the relevant planning authority (and, where specified, following consultation with relevant consultees) before the relevant stage of development may commence.<br><br>The Applicant therefore considers that the **Draft DCO** (Doc Ref. 3.1 Rev 2) contains an appropriate and robust framework for the approval and implementation of detailed management measures. In respect of the **Outline Construction Traffic Management Plan (OCTMP)** [APP-278] specifically, the purpose of the OCTMP is to establish |

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| | | the framework, controls and mitigation measures which will govern construction traffic management, whilst still allowing the flexibility to prepare the detailed CTMP upon the appointment of the Contractor to reflect the final construction methodology and programme.<br><br>The Applicant disagrees with the point regarding the absence of the Detailed CTMP, or a Detailed CEMP, and how it prevents the council assessing the efficacy of mitigation. The **OCEMP** (Doc Ref. 7.10 Rev 2) and **OCTMP** [APP-278] secure the parameters for assessment, such as working hours and HGV routeing, enabling the ES to assess a robust and realistic worst-case scenario based on the peak construction phase assumptions.<br><br>The **OCTMP** [APP-278] sets out a comprehensive list of management measures and commitments in order to protect the affected receptors against the impact of the Scheme. Requirement 15 of the **Draft DCO** (Doc Ref 3.1 Rev 2) ensures that the Detailed **CTMP** will be produced broadly in alignment with the approved **OCTMP** [APP-278], and that it will be consulted on with the Highways Authority. This will ensure that the assessment parameters and mitigation proposed in the **OCTMP** [APP-278] will be delivered, and therefore the conclusions of the ES will remain robust and accurate.<br><br>Consequently, the **OCTMP** [APP-278] offers the appropriate level of detail at this stage of the DCO process |

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| | | by ensuring that detailed construction traffic management arrangement are considered and developed in consultation with the relevant highway authorities prior to the commencement of works. |
| **SHDC-047**<br>Cowbit Parish Council traffic concerns | Cowbit Parish Council object to the proposed development based on the excessive amount of traffic during the two year construction phase, followed by the ongoing maintenance. Proposed access roads for construction vehicles are not considered suitable with road weight limits and proximity to houses with resulting vibration harm a concern. | The Applicant notes Cowbit Parish Council's concerns regarding construction traffic, the suitability of local roads and the potential for disturbance to nearby residents.<br><br>The Applicant does not agree that the construction traffic associated with the Scheme would result in unacceptable highway impacts. The likely traffic effects of the Scheme have been assessed within **ES Chapter 15: Traffic and Access** [APP-066], which considers construction traffic generation, routing, access arrangements and the resulting impacts on the local and strategic highway network. The assessment concludes that no significant adverse traffic and transport effects are anticipated during the construction, operation or decommissioning phases of the Scheme.<br><br>The Applicant notes the specific concerns regarding roads within Cowbit Parish. The main roads within the parish associated with the Scheme include the A16, Barrier Bank, Back Gate and Stone Gate. Construction traffic routing has been developed to utilise the most appropriate routes available and is supported by the mitigation measures secured through the **OCTMP** [APP-278]. These measures include HGV routing controls, delivery management |

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| | | procedures, workforce travel management, shuttle bus provision and monitoring arrangements.<br><br>Vehicle activity associated with the Scheme during the operational phase will be substantially lower than during construction. As stated in **ES Chapter 15 Traffic and Access** [APP-066], there will be a very limited number of vehicle movements associated with maintenance, inspection and occasional replacement activities and therefore the operational traffic effects of the Scheme would be negligible.<br><br>The Applicant also notes concerns regarding potential vibration impacts arising from construction traffic travelling in proximity to residential properties whilst utilising the local roads. In terms of vibration, construction traffic routes would be managed through the **OCTMP** [APP-278], which would require the use of roads suitable for HGV movements and consideration of any applicable weight restrictions. By restricting construction traffic to routes that are capable of accommodating HGV movements, the potential for vibration associated with vehicles travelling over road surface irregularities would be minimised. Where roads are suitable for the anticipated construction traffic and are maintained in an appropriate condition, vibration levels generated by passing construction vehicles would not be perceptible. |

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| **SHDC-048**<br>Community liaison | One community liaison person in place for contact with any issues should they arise whilst works are being carried out; | The **OCEMP** (Doc Ref. 7.10 Rev 2) sets out that a Community Liaison Officer would act as the primary point of contact for queries or complaints throughout construction and commissioning. Furthermore, in accordance with Requirement 4 of the **Draft DCO** (Doc Ref. 3.1 Rev 2), a Community Liaison Group must be established prior to the commencement of the Scheme to facilitate liaison between representatives of people living in the vicinity of the Order Limits and other relevant organisations in relation to the construction of the Scheme. |
| **SHDC-049**<br>Mud on roads and large vehicles | 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; | The Applicant notes South Holland District Council's comments regarding the potential for mud to be deposited on the highway network during construction and the potential effects of construction traffic, including large and abnormal loads, on roads that are currently in poor condition.<br><br>These matters have been considered within the **OCTMP** [APP-278] and form part of the construction traffic management framework assessed within **ES Chapter 15: Traffic and Access** [APP-066].<br><br>The **OCTMP** [APP-278] includes a range of measures intended to minimise the transfer of mud and debris onto the public highway, including the management of construction access points, wheel and vehicle cleaning measures, where necessary, monitoring of road conditions, |

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| | | and procedures for the prompt removal of mud or debris should it occur at any point during the construction phase.<br><br>In relation to the condition of local roads, the requirement for road condition surveys is set out in paragraph 7.4.2 of the **OCTMP** [APP-278]. Surveys 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 re-instatement.<br><br>The Applicant has additionally developed a Temporary Passing Place Strategy to be submitted during examination following further engagement with the Local Highway Authority. Following agreement with the Local Highway Authority on these proposals, the designs are to be incorporated into the **OCTMP** [APP-278]. The passing place strategy and access mitigation proposals, to be secured through the **OCTMP** [APP-278], would facilitate the safe passage of construction traffic and reduce the risk of vehicles overrunning verges or carriageway edges on narrower roads as part of the routing of construction traffic to/ from the Scheme. In addition, abnormal indivisible loads and other large vehicles would be managed through agreed routing strategies and traffic management measures secured through the **OCTMP** [APP-278]. |

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| **SHDC-050**<br>Construction traffic hours | Consideration of works traffic hours in relation to effects on local transport; and | The Applicant notes South Holland District Council's comments regarding the timing of construction traffic and its potential effects on the local transport network.<br><br>Construction traffic hours have been considered as part of the assessment presented in **ES Chapter 15: Traffic and Access** [APP-066] and the **OCTMP** [APP-278].<br><br>The traffic assessment identifies peak network periods as 08:00–09:00 and 16:00–17:00. Construction working hours are proposed to be limited to 07:00–19:00 Monday to Friday and 08:00–13:30 on Saturdays, with no routine construction activities on Sundays or Public Holidays. This means that construction workers will travel outside of the network peak hours, i.e. before 07:00 and after 19:00 on a weekday.<br><br>Furthermore, construction traffic management measures have been developed to minimise impacts during these periods. This includes workforce travel management measures, the use of shuttle buses for a significant proportion of construction workers, and the control of delivery scheduling to avoid network peak hours.<br><br>Thus, no construction traffic will travel during the local AM network peak, and only some (limited) HGVs will use the local road network during the PM network peak. These mitigation measures will be secured through the **OCTMP** [APP-278]. |

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| | | The Applicant therefore considers that the timing of construction traffic has been appropriately considered within the assessment and that suitable mechanisms are in place through the **OCTMP** [APP-278] to minimise potential impacts on local roads. |
| **SHDC-051**<br>Access remediation and reinstatement | 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. | With the implementation of pollution prevention and incident response measures contained within the **OCEMP** (Doc Ref. 7.10 Rev 2), it is unlikely that remediation of soils would be required following the removal of any temporary construction compounds and field accesses. Reinstatement of soils would be undertaken in accordance with the measures outlined within the **OSMP** (Doc Ref. 7.14 Rev 1). As set out within the **OSMP** (Doc Ref. 7.14 Rev 1), reinstatement will aim to restore all agricultural land without any degradation of the current ALC Grade, as informed by the detailed ALC survey. |
| Other Matters | | |
| **SHDC-052**<br>Overhead line visual impact | The Planning Policy Officer for the Council has raised concerns over the visual impact with the overhead line and stated it is regrettable that the | As stated within **ES Chapter 3: Alternatives and Design Evolution** [APP-054], overhead lines are the preferred technology as guided by national policy contained in paragraph 2.9.21 of EN-5[9]. |

[9] Department for Energy Security and Net Zero, 2025. National Policy Statement for electricity networks infrastructure (EN-5). London: Department for Energy Security and Net Zero. Available at: www.gov.uk [Accessed 29 July 2026].

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| | developer is not providing the connection underground much like other NSIP schemes. | This presumption is reversed when proposed developments would cross part of a nationally designated landscape. In the case of the Scheme, there are no nationally designated landscapes within or near to the Order Limits.<br><br>Where the Applicant has chosen to underground a section of the 400 kV overhead line and the 132 kV Inter-Array Connection between Land Parcel A and B, this is to respond to technical constraints associated with crossing existing infrastructure and maintaining safe operations at the Peterborough and Spalding Gliding Club respectively.<br><br>In respect of paragraph 2.9.14 of EN-5, which requires due consideration to the costs and benefits of feasible alternatives for overhead lines where particularly significant landscape and visual effects are reported, this policy is addressed in Section 5.11 of the **Planning Statement** [APP-260] and details regarding the selection of an overhead line are provided in **ES Chapter 3: Alternatives and Design Evolution** [APP-054].<br><br>Where major adverse effects are identified within **ES Chapter 12: Landscape and Visual** [APP-063], these relate to the prevalence of Solar Development Area infrastructure rather than owing to the presence of Grid Connection Route infrastructure. All landscape and visual effects reported with respect to Grid Connection Route infrastructure are moderate adverse effects. The cumulative effects assessment does not report an increase |

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| | | in the significance of the adverse effects as a result of additional overhead line infrastructure associated with the Grimsby to Walpole and Weston Marsh to East Leicestershire overhead line projects. No significant adverse effects have been specifically identified in relation to the presence of the overhead Inter-Array Connection Area infrastructure (also classed as an NSIP).<br><br>While there is no definition within EN-5 as to what may be deemed particularly significant, the Applicant has understood this to be those effects that exceed moderate adverse significance, which is not the case for the overhead line infrastructure, including in the cumulative effects assessment. Additionally, there is no specific segment of the Grid Connection Route where greater landscape or visual effects are reported.<br><br>On this basis, the Applicant concludes that the Scheme does not cross any part of a nationally designated landscape that would reverse this presumption, nor are the landscape and visual effects of the overhead lines reported in **ES Chapter 12: Landscape and Visual** [APP-063] deemed to be so significant that undergrounding should be given thorough consideration as a viable alternative in accordance with paragraph 2.9.14 of EN-5.<br><br>The Applicant has therefore adopted an approach that is consistent with national policy, taking into account the balance between visual effects, technical feasibility, |

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| | | environmental considerations and the urgent national need to deliver new electricity network infrastructure to support decarbonisation and energy security.<br><br>The Applicant cannot comment on the decisions of other promoters to adopt underground routes, as those decisions have been taken in the context of project-specific considerations and the application of EN-5 to the particular circumstances of those schemes. |
| **SHDC-053**<br>Best and most versatile agricultural land | The loss of best and most versatile agricultural land is a concern with the exact lost for the development unclear due to omissions for hard standing areas | 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 Rev 1), alongside an assessment of the significance of the effect. There are no omissions with regards to the assessment of hardstanding areas, all hardstanding areas have been considered within Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1). The assessment has subsequently informed the measures incorporated within the **OSMP** (Doc Ref. 7.14 Rev 1).<br><br>The **OSMP** (Doc Ref. 7.14 Rev 1) 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 |

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| | | 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 Rev 1), 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. |
| **SHDC-054**<br>Crowland Parish Council objection | Crowland Parish Council object to the development with the primary concern being the loss of rural countryside, impacting the visual amenity of the area.<br><br>The Parish Council also state that the proposed community benefits are not ambitious enough for a development of this scale and developers should fund a desperately needed new community building and replacement sports changing facilities for Crowland. | The Applicant notes this concern. The LVIA has considered the landscape and visual effects of the increased presence of infrastructure in the landscape and change of use of agricultural land, as set out within **ES Appendix 12-4: Landscape Assessment** [APP-238] and summarised within Section 12.8 of **ES Chapter 12: Landscape and Visual** [APP-063]. The Applicant recognises the significant adverse landscape and visual effects and has taken these into account in its planning balance set out within the **Planning Statement** [APP-260]. The Applicant has developed the Scheme proposals to avoid, reduce and mitigate adverse |

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| | | effects through application of the mitigation hierarchy and consideration of good design, but such is the nature of large-scale infrastructure projects. The status of the Scheme as a CNP infrastructure means that residual impacts, including landscape and visual, should not outweigh the urgent need for the Scheme in the planning balance. There are no residual impacts on any of the exceptions listed at paragraph 4.2.98 of EN-1 nor are any exceptional circumstances present that would reverse this presumption. The Applicant maintains its view, that while the significant adverse landscape and visual effects reported will attribute some negative weight in the planning balance, the substantial benefits and urgent need for the Scheme outweigh these adverse impacts.<br><br>While it does not form part of the DCO Application, the Applicant is committing to a Community Benefit Fund of approximately £500,000 per year of operation of the Scheme (up to £20 million in total assuming a 40-year operational period), should the Scheme gain consent. The fund is not linked to the effects reported within the Environmental Statement as it is not considered mitigation or compensation (which are separately provided and secured as part of the DCO Application).<br><br>The Applicant will work with the local authorities and parish councils to further develop its Community Benefit Fund proposals. |

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| **SHDC-055**<br>Councillor clarification points | Councillors have raised concerns about the current development. At a members meeting the following areas require additional clarification and discussion: | The Applicant has responded to these points below. |
| **SHDC-056**<br>Weston Marsh point of connection | Uncertainty over which Weston Marsh Substations will be the point of connection i.e. A or B currently assumed Substation B but not confirmation | As part of the wider Grimsby to Walpole project National Grid Electricity Transmission (NGET) is progressing the design of two new substations at Weston Marsh (A and B). The final siting of both substations remains subject to ongoing consultation and design coordination. The Applicant has therefore taken a proportionate and flexible approach, basing its design on the southern location (Weston Marsh B) to minimise interaction with other major projects while retaining sufficient land within the Order Limits to accommodate a connection point once NGET finalises the substation location and layout.<br><br>Connection arrangements continue to align with the parameters of the original grid offer and with National Grid's emerging design for the Weston Marsh B Substation.<br><br>Further details of the grid connection are set out in the **Grid Connection Statement** [APP-270]. |
| **SHDC-057**<br>Advanced planting | Visual Impacts – Advanced Planting critical | The Applicant notes this comment. The landscape strategy presented within the **OLEMP** (Doc Ref. 7.16 Rev 1) has been developed in liaison with visual specialists and specifies advanced planting. The **OLEMP** (Doc Ref. 7.16 Rev 1) describes the landscape and ecological strategy for planting across the Site which has been designed to provide |

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| | | 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). |
| **SHDC-058**<br>Construction road suitability | Suitability of the Roads for the Construction Traffic | The Applicant notes the specific concerns regarding roads. Construction traffic routing has been developed to utilise the most appropriate routes available and is supported by the mitigation measures secured through the **OCTMP** [APP-278]. These measures include HGV routing controls, delivery management procedures, workforce travel management, shuttle bus provision and monitoring arrangements. |
| **SHDC-059**<br>Solar array runoff | Flood Risk- Runoff from the Solar array causing flooding across the flat landscape | The impact of the Scheme on surface water has been assessed within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref 6.1 Rev 1). The Solar Development Area Outline Drainage Strategy is presented in **ES Appendix 11-4: Outline Drainage Strategy** [APP-277] and has been developed to minimise flood risk through the proposed drainage measures, which have been detailed in the strategy report. Runoff from the Scheme would be managed to discharge at greenfield run off rates. |
| **SHDC-060**<br>BESS fire hazards | Fire Hazards associated with the BESS. | The Battery Safety Management Plan (BSMP), which will be prepared in accordance with the **Outline Battery Safety Management Plan (OBSMP)** [APP-284] and secured by way of Requirement in the **Draft DCO** (Doc Ref. 3.1 Rev 2), |

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| | | ensures that the final BESS compound will be designed in accordance with prevailing industry standards and good practice at the time of detailed design and implementation.<br><br>The Applicant's **Outline Battery Safety Management Plan** (OBSMP) [APP-284] fully accommodates the latest BESS safety requirements contained in NFPA 855 (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. The OBSMP has been prepared for the Scheme using guidance from Lincolnshire Fire and Rescue Service (LFR) and incorporating recommendations of the National Fire Chiefs Council (NFCC). The OBSMP very clearly documents the fire and explosion protection requirements for the illustrative BESS design and the BESS system that will be selected at the detailed design stage.<br><br>The Applicant's OBSMP [APP-284] has been drafted to identify and address credible BESS failure hazards namely thermal (fire), overpressure /deflagration (explosion), and toxic emission (plume) hazards. In addition, the OBSMP addresses potential secondary BESS fire pollution issues i.e. water and soil contamination.<br><br>As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be |

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| | | utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 5).<br><br>LSFT involves deliberately burning a complete BESS enclosure to evaluate thermal exposure, heat release rates, burn duration, maximum temperatures and, critically, the potential for fire propagation to adjacent BESS or associated equipment. The purpose of this testing is expressly to validate minimum equipment spacing and to demonstrate that cascading or multi- BESS enclosure ignition does not occur where tested layouts and mitigation measures are implemented. These tests therefore explicitly address the type of multi-BESS fire propagation risks, including scenarios observed in real world incidents, by requiring evidence that propagation risk is controlled through design rather than reliance on emergency intervention.<br><br>The implementation of the OBSMP [APP-284] is secured through Requirement 6 in Schedule 2 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). This provides that a detailed Battery Safety Management Plan (BSMP) will be submitted to Lincolnshire County Council for approval following consultation with LFR and the Environment Agency (EA) prior to the commencement of the works for the BESS. The |

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| | | final BSMP plan will be substantially in accordance with this OBSMP. |
| **SHDC-061**<br>Community benefits | Community Benefits – Whether fund is enough and how administered. | While it does not form part of the DCO Application, the Applicant is committing to a Community Benefit Fund of approximately £500,000 per year of operation of the Scheme (up to £20 million in total assuming a 40-year operational period), should the Scheme gain consent.<br>The Applicant will work with the local authorities and parish councils to further develop its Community Benefit Fund proposals. |
| **SHDC-062**<br>Highways authority comments | Lincolnshire County Council act as Highways Authority and Lead Local Flood Authority and will comment directly on the proposed development, as may the Drainage Board and the Environment Agency. Additionally, there are other stakeholders such as the Wildlife Trust and Natural England who will provide comments directly associated with ecological impacts | Noted. The Applicant is actively engaging with those stakeholders on these matters. |
| Concluding Remarks | | |

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| **SHDC-063**<br>Purpose of inclusive response | Whilst we appreciate many stakeholders will comment directly to the Applicant on the project, we wanted to provide a robust and inclusive response by giving all internal stakeholders the opportunity to comment that may not be fully aware of the proposals. | Noted. The Applicant appreciates the Council's detailed responses and looks forward to continued engagement. The matters listed in the concluding remarks are responded to in full in the rows above. |
| **SHDC-064**<br>Food production impacts | Concerns have been raised from internal officers, consultants on behalf of the Council as well as ward members and parish councils. The proposed development impacts a substantial amount of highly sensitive agricultural land (74%). Removing this land from arable use for the 40-year operational lifespan is not viewed as a temporary impact, and it poses a severe disruption to local food production and the agricultural supply chain in South Holland. | |
| **SHDC-065**<br>Post-consent assessment deferral | The Council firmly objects to deferring critical evaluations to post-consent stages. A robust assessment cannot be made without immediate, detailed evaluations of cultural heritage trenching, the inter-array connections, and the grid connection route. | |
| **SHDC-066**<br>Environmental impacts | There are serious local reservations regarding the management of construction traffic, dust generation, noise disturbances, and highway suitability. Furthermore, the omission of | |

| Topic | Matter Raised | Applicant's Response |
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| | assessments regarding Battery Energy Storage System (BESS) fire hazards and groundwater flooding is unacceptable and must be rectified. | |
| **SHDC-067**<br>Community benefits | The delivery of only 5 net local jobs over 40 years is concerning, and the proposed community funding currently lacks the formal guarantees necessary to assure the Council that the local area will be sufficiently compensated for hosting this infrastructure | |
| **SHDC-068**<br>Community benefits | We note the 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. | |
| **SHDC-069**<br>Landscape objection | The Council does not support the Scheme on landscape and visual grounds. The submitted ES demonstrates that the Scheme would result in extensive significant adverse landscape and visual effects during construction, operation and decommissioning. Significant effects would remain at Operation Year 15, including effects on key Fenland landscape receptors and a wide range of | |

| Topic | Matter Raised | Applicant's Response |
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| | visual receptors. The ES also acknowledges that significant landscape and visual effects cannot be fully mitigated and that no additional mitigation is proposed | |
| **SHDC-070**<br>Landscape character and visual harm | The Council considers that the Scheme would cause unacceptable harm to the character, openness and visual amenity of the Fenland landscape. The Council is particularly concerned by the scale of solar development, the BESS and substation infrastructure, the overhead inter-array connections, the 400kV Grid Connection Route, the persistence of significant residual effects, and the cumulative interaction with other major energy infrastructure schemes. | |

## 2.3. Lincolnshire County Council

2.3.1. Tables 2-3 and 2-3A below sets out the Applicant's response to the issues raised within the Relevant Representation from Lincolnshire County Council [RR-111] including signposting to the relevant sections of the DCO Application.

**Table 2-3 Lincolnshire County Council**

| Topic | Matter Raised | Applicant's Response |
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| Site Selection and Alternatives | | |
| **LCC-001**<br>Point of Connection Siting Zone | Document 7.1 Planning Statement: Appendix D: Site Selection Report [APP-264] provides an overview of the site selection process undertaken by the applicant to identify the location for the scheme. Its sets out why the proposal and its Order Limits have been located in the chosen area and identifies the criteria used to help define the potential use of land parcels within the scheme. The consideration of alternatives is addressed specifically within ES Chapter 3: Alternatives and Design Evolution [APP-054].<br><br>Sections 3.3.4 to 3.3.12 of the Site Selection Report describe the applicant's discussions with NESO, and then NGET, over a potential grid connection point. At 3.3.6, it is stated that 'The Applicant and NGET agreed a siting zone for further consideration however the indicative location of the substation was not known at this point in time'. It is not clear from the text what area the 'siting zone' refers to. Similarly, is stated at 3.3.15 that 'The Applicant did not adopt a rigid search area as the exact location of the Weston Marsh | The grid connection offer provided by NESO to the Applicant in November 2022 confirmed a connection would be facilitated by a spare bay within the design of a new Weston Marsh 400kV Substation. The initial siting zone assumed for the substation considered was the area between Spalding and Walpole. This was not formally defined. This was the limited information relied upon by the Applicant between November 2022 and January 2024. This is the 'point in time' referred to at paragraph 3.3.15 of the **Planning Statement: Appendix D: Site Selection Report** [APP-264].<br><br>Between January and March 2024, NGET held a non-statutory consultation for its Grimsby to Walpole project. This consultation included a 'preferred siting zone' developed by NGET for the Weston Marsh substation. The Applicant updated its assumptions for the substation location and adopted this preferred siting zone as it progressed design development (i.e. from January 2024 onwards). This preferred siting zone is illustrated on Figure |

| Topic | Matter Raised | Applicant's Response |
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| | Substation was not confirmed at that point in time'. It would be helpful if the applicant could identify what 'point in time' this statement is referring to, to aid overall understanding of the sequence of decisions that were taken in identifying the chosen location. | 3-1 of Planning Statement: Appendix D: Site Selection Report [APP-264].<br><br>Between June 2025 and August 2025, NGET held another consultation. This expanded the 'preferred siting zone' for the substation as it was considering whether one or two new substations would be required at the Weston Marsh area. This area was greater in size than the preferred siting zone presented within the 2024 proposals to account for the two potential substations and a connection point for the newly announced Weston Marsh to East Leicestershire project.<br><br>A targeted consultation was held by NGET between November 2025 and December 2025 on its proposals for two new substations at Weston Marsh. The Applicant subsequently amended its anticipated point of connection and consulted on these changes in January 2026. These changes form the proposal set out within the DCO Application. |
| **LCC-002**<br>Site selection timeline | In reviewing the applicant's section on site selection, the Council suggests that the timeline of decisions with respect to search areas for potential PV sites is somewhat unclear in terms of what areas were identified and when, and what engagement there was with NESO/NGET and landowners at each stage. Whilst paragraph 3.3.12 attempts to describe the | The Applicant held initial pre-application discussions with NGET in December 2021. NGET informed the Applicant that a new substation was going to be established between Spalding and Walpole, which would have capacity available.<br><br>In early 2022, the Applicant undertook its site search assessment, as per the criteria set out in the **Planning Statement: Appendix D: Site Selection Report** [APP-264]. |

| Topic | Matter Raised | Applicant's Response |
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| | sequencing and decision making over this period, further clarity from the applicant would be welcomed here. | The willingness of landowners to voluntarily enter into an agreement with the Applicant was a key factor informing the Applicant's search, with a view to minimising the need to rely on powers of compulsory acquisition. Commercial discussions with the landowner of Land Parcel D first took place in January 2022. The Applicant then undertook discussions with nearby landowners (Parcels B and C) in Spring/Summer 2022 to assemble the land and commence survey efforts for the Scheme.<br><br>A fifth landowner was identified to the east of Land Parcel D in 2022, however this landowner decided to withdraw from the Scheme. |
| **LCC-003**<br>Smaller land parcels | At paragraph 3.3.14 there is reference to 'smaller land parcels' not being considered a reasonable alternative since they would not be able to deliver the scale of energy generation enabled for the grid connection. The Council however has experience in dealing with other solar schemes within the County where conglomerations of smaller land parcels have been shown to allow PV generation at similar scales therefore the applicant should provide further explanation as to why this approach was discounted. | While it is possible to assemble a solar scheme from a number of smaller, discrete land parcels, fragmentation of the development area and the associated infrastructure required to connect separate parcels are important considerations. A more fragmented scheme would typically require a greater extent of cabling, access tracks, substations and crossing infrastructure to connect the various components of the development, which could increase environmental effects, land take and overall planning impacts.<br><br>In addition, the Applicant has sought to maximise the generation capacity achievable through its available grid connection. The ability to secure a sufficient quantum of |

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| | | suitable land is therefore a key consideration. Reliance on a greater number of smaller land parcels increases land assembly risk and would be likely to affect the deliverability of the scale of generation required to make best use of a grid connection offer.<br><br>As set out in the **Planning Statement: Appendix D: Site Selection Report** [APP-264], the Applicant considered a range of environmental, technical and planning constraints when identifying the Solar Development Area. Given the nature and distribution of these constraints, there are no obvious alternative combinations of smaller unconstrained land parcels capable of accommodating the proposed development at a similar scale whilst demonstrably reducing environmental effects.<br><br>Furthermore, a key principle underpinning the land assembly strategy has been to secure land through voluntary agreement and therefore reduce reliance on compulsory acquisition powers. Whilst the Applicant has engaged with a number of landowners, increasing the number of separate parcels and land interests would have added complexity to the negotiation process and likely increased the number of affected landowners and the need to rely on powers of compulsory acquisition, which could in turn adversely affect the deliverability and programme of the Scheme. |

| Topic | Matter Raised | Applicant's Response |
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| **LCC-004**<br>Western alternative site option | In terms of Agricultural Land Classification (ALC) grades and how that influenced site selection, whilst it is accepted that avoidance of Best and Most Versatile (BMV) land in and around the point of connection is difficult, given the prevalence of high quality agricultural land in the area (reference paragraph 3.3.26), it would appear that no consideration has been given to siting the solar farm on land several kilometres to the west of the PoC, where provisionally the land is mapped as Grade 3 and therefore predicted as having lower BMV grade, with only moderate likelihood of being BMV Land (20 – 60%). Such an approach would be more consistent with the policy requirement to prioritise poorer quality land and would be appropriate as part of a 'regional level' site selection process which this section of the document deals with (in comparison with the local level site selection process in section 3.4). | In early 2022, the Applicant undertook its site search assessment, as per the criteria set out in the **Planning Statement: Appendix D: Site Selection Report** [APP-264]. The willingness of landowners to voluntarily enter into an agreement with the Applicant was a key factor informing the Applicant's search, with a view to minimising the need to rely on powers of compulsory acquisition. Commercial discussions with the landowner of Land Parcel D first took place in January 2022. The Applicant then undertook discussions with nearby landowners (Parcels B and C) in Spring/Summer 2022 to assemble the land and commence survey efforts for the Scheme.<br><br>No willing landowners were identified in this area to the west of the PoC. The land identified as Grade 3 to the west of Bourne, on Natural England's Provisional ALC Mapping, is subject to other designations that require consideration in the site selection process, such as the prevalence of areas of ancient woodland, historic parks and gardens, and SSSIs, which would make identifying an area of land of a sufficient scale and the siting of necessary electricity networks infrastructure for the purposes of the Scheme difficult. |
| **LCC-005**<br>Food production impacts | Furthermore, although covered in more detail under the section on Soils, Agriculture and Food Production, there is a very obvious discrepancy between the results of the ALC survey submitted with the | The ALC survey reports for the Solar Development Area (**ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1)) provide field observation data and survey results at a greater granularity than the Predictive ALC mapping. Applicant's |

| Topic | Matter Raised | Applicant's Response |
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| | application, which maps large tracts of Grade 3b (non-BMV) land within the solar PV area, versus the predictive land assessment mapping data shown at Figures 3-4, 3-5 and 3-6, which indicate a high likelihood of BMV occurring and land falling within either Grades 1 or 2 (BMV). Detailed questions as to the justification for much of the 3b mapping have been posed to the applicant and further discussions on this topic are anticipated during the course of the examination. | responses to the detailed comments raised are provided in rows below. The Applicant has also met with Natural England and LCC on 14 August 2026 to discuss and seek common ground on the ALC survey results. The Applicant's and stakeholders' position on the ALC survey is tracked through the **Statement of Common Ground with Natural England** (Doc Ref. 8.13) and **Statement of Common Ground with LCC** (Doc Ref. 8.11) |
| **LCC-006**<br>Flood risk and site selection | In terms of Flood Risk, the majority of the land within the application area lies within Flood Zones 2 and 3. The applicant highlights the area 18 – 20 km to the west, north of Bourne, where flood risk is mapped as being lower, but cite various constraints to development in this area. Additionally, although there are small areas of Flood Zone 1 to the south of Weston, the applicant states that these could not fully accommodate an NSIP scale solar development of the scale required. The text cross-references to the application of the Sequential Test and Exception Test as detailed in the Planning Statement (APP-260] and Appendix 11-3 to the ES Flood Risk Assessment [APP-222]. The Council intends to make further comments on the application of the Sequential and Exception tests in the LIR. | Noted. The Applicant awaits further comments from LCC within its Local Impact Report regarding application of the Sequential and Exception Tests. The Applicant is preparing a technical note with further clarifications on the application of sequential and exceptions tests at Deadline 2, which will take into account the comments made in the Local Impact Report. |

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| **LCC-007**<br>Figure 3-8 designation mapping | With reference to Figure 3-8 Key planning and environmental designations, it is unclear what the large expanse of land encompassing Bourne and areas surrounding it, mapped by light green diagonal shading, is representing. The nearest item visually on the key is 'Special Protection Area' (SPA), but there is no SPA covering this area, that being limited to The Wash on the east coast. Clarity from the applicant on what this shading represents would be welcomed. | The light green diagonal shading indicates Conservation Areas. However, upon further inspection, this specific area which expands across a large area of Bourne has been incorrectly labelled as a Conservation Area on GIS. Instead, this area reflects the local authority area of South Kevesten District Council. |
| **LCC-008**<br>Scheduled monuments | Paragraph 3.3.40 refers to the presence of two Scheduled Monuments within land parcel C. Development within the vicinity of these monuments is considered to be feasible through site specific investigation, surveys and exclusion zones. More detail on the Council's response to the application from a cultural heritage perspective is provided below and will be expanded upon in the LIR. | Noted. Please see the rows on cultural heritage for the Applicant's response. |
| **LCC-009**<br>Localised site selection factors | The section on Localised Site Selection (3.4) addresses factors considered at a more local level in the site selection process, covering:<br>• proximity of land to dwellings;<br>• Agricultural Land Classification and type;<br>• Flood risk;<br>• Accessibility; | Noted. Please see the relevant rows below for the Applicant's response. |

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| | • Public Rights of Way;<br>• Security and Lighting.<br>In terms of proximity to dwellings, the Council's response to this is covered in more detail later in this report (under Landscape and Visual Impacts) and will be expanded on in the LIR. Similarly with Flood Risk, Accessibility, and Public Rights of Way. | |
| **LCC-010**<br>ALC methodology and infrastructure siting | With respect to Agricultural Land Classification, as alluded to above, the Council has concerns over the ALC survey methodology adopted and subsequent grading of the land, with questions in particular over the extent of mapped ALC subgrade 3b. Whilst this section discusses how ALC has influenced decisions over the siting of infrastructure, fundamentally the Council wish to seek resolution of the queries on ALC grading across the site, in particular the extent of BMV/non-BMV land, before making detailed comments on the applicant's infrastructure siting decisions. As previously highlighted, there is a significant discrepancy between the predicted land assessment plans and the ALC survey plans with paragraph 3.4.13 stating that the amount of BMV within the Order limits lies somewhere in the range of 35.2% and 39.2%. This would appear to be a very low percentage when judged against the provisional and | The ALC survey reports for the Solar Development Area (**ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1)) provide field observation data and survey results at a greater granularity than the Predictive ALC mapping. Applicant's responses to the detailed comments raised are provided in rows below. The Applicant has also met with Natural England and LCC on 14 August 2026 to discuss and seek common ground on the ALC survey results. The Applicant's and stakeholders' position on the ALC survey is tracked through the **Statement of Common Ground with Natural England** (Doc Ref. 8.13) and **Statement of Common Ground with LCC** (Doc Ref. 8.11). |

| Topic | Matter Raised | Applicant's Response |
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| | predicted extent of BMV as presented in Figures 3-4, 3-5 and 3- 6, with large extents of Grade 1 and 2 land and the likelihood of it being BMV at >60%. | |
| **LCC-011**<br>Alternative solar technologies | Section 3.5 of ES Chapter 3: Alternatives and Design Evolution [APP-054], addresses alternative scheme technologies considered by the applicant. For the solar PV panel technology, it states that at the early stage of design development three types of solar PV panels were considered, notably (i) fixed south facing; (ii) east-west single axis tracker solar panels and (iii) fixed east west panels. Fixed south facing panels were selected in preference to tracker panels due to lower land take requirements. Similarly, east west fixed were discounted, since the proposed development includes a Battery Energy Storage System (BESS) which can provide required flexibility in storage and distribution of energy. | South-facing fixed-tilt solar panels represent the established and most efficient design for utility-scale solar developments in the UK, maximising annual electricity generation from a given site. By orientating panels towards the south at an optimal tilt angle, the panels capture the greatest amount of solar irradiance over the course of the year, resulting in higher energy yields than alternative configurations such as vertical bifacial systems. This will enable the Scheme to generate more renewable electricity from the same land area, improving the overall efficiency of the Scheme and making a greater contribution towards national renewable energy and net zero targets.<br><br>The higher energy density achieved by south-facing arrays also reduces the land take required per unit of electricity generated. To achieve the same generating capacity using lower-yield technologies, a larger site or a greater number of panels would typically be required, potentially increasing environmental effects, development costs and interference with private land rights. Optimising energy output from the Site through use of south-facing fixed-tilt panels therefore represents an efficient use of land and infrastructure. |
| **LCC-012**<br>Vertical bifacial panels | One further option which does not appear to have been considered as part of the assessment is the deployment of vertical bifacial panels, which capture sunlight on both sides of the panels and allow for conventional farming practices to take place between panel rows. Potentially, these agrivoltaic systems are able to provide a balance between energy generation | |

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| | and agricultural production, providing dual land use efficiency benefits. | South-facing arrays also benefit from a long-established design and operational track record within the UK. Their performance characteristics are well understood, enabling robust prediction of energy generation, maintenance requirements and long-term operational performance. This provides greater certainty for investors, network operators and the planning process.<br><br>While alternative configurations, including vertical bifacial panels, may offer advantages in specific circumstances such as agrivoltaic applications or altered generation profiles, the primary objective of the Scheme is to maximise the generation of low-carbon electricity from the Site. In this context, south-facing fixed-tilt panels represent the most appropriate and effective design solution, balancing technical performance, commercial viability and efficient use of land. It is also noted that agrivoltaics are at research and development phase in the UK at the moment and the practices are not readily available for adoption at this stage. |
| Grid Connection | | |
| **LCC-013** | The Meridian Solar development is dependent upon a successful grid connection into a substation at Weston Marsh, which has yet to be built as a component of a separate NSIP project, Grimsby to Walpole. The Grimsby to Walpole project has not yet been | The Applicant intends to reapply for Gate 2 status at future application rounds as NESO confirms the availability of further regional capacity, particularly as major network upgrades, including the Grimsby to Walpole reinforcement, progress. There is no evident barrier to Meridian Solar Farm being granted a Gate 2 offer in future rounds. |

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| | submitted to Planning Inspectorate (PINS) for examination.<br><br>National Grid Electricity Transmission (NGET) has been working on the design of two new substations at Weston Marsh (A and B). An application for Substation A has been made to South Holland District Council under the Town and Country Planning Act (TCPA), to facilitate a connection for the Outer Dowsing Offshore Wind project, which received its Development Consent Order (DCO) earlier in 2026. However, the siting of Substation B remains subject to ongoing consultation and design coordination. Approval will be sought as part of the wider Grimsby to Walpole DCO submission, currently scheduled for Summer 2027, with an anticipated recommendation and decision in 2028. If approved, National Grid's project website indicates that construction of the earlier phases at Weston March would commence 2028 – 2030, with full operation of the whole project by 2033. The applicant has based the Meridian project on a grid connection into Weston Marsh Substation B.<br><br>In the Grid Connection Statement submitted with the application [APP-270], it is noted that the applicant initially received a grid connection offer in November 2022 for 750 Mega Watts (MW) export and 350 MW import BESS capacity, with a connection date of 2033. | |

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| | However, following recent National Energy System Operator (NESO) Connections reform, the applicant's offer was varied to a Gate 1, meaning a later connection date of post-2035. An earlier connection date may still be possible in the 2031 – 2035 window if the applicant is successful in reapplying through future Gate 2 application rounds, which they state they intend to do as soon as possible. | |
| **LCC-014**<br>Seven-year implementation period | Against this backdrop of uncertainty with regards to connection offers, the applicant is proposing to include in the draft DCO a seven-year implementation period for the commencement of construction from the grant of consent. This is longer than the typical five-year implementation period on other similar DCOs and raises potential questions over EIA assessments and validity of supporting data, interactions with other projects and timelines, and assessment of cumulative effects, which are addressed separately in this document and will be expanded on in the Council's LIR. | The Applicant notes the Council's comments regarding the proposed seven-year commencement period and associated seven-year period for the exercise of compulsory acquisition powers.<br><br>As explained in the **Explanatory Memorandum** [APP-029], the seven-year commencement period reflects established precedent, including the Cory Decarbonisation Project Order 2025, and is justified by the ongoing NESO grid connection reforms and uncertainty regarding the timing of a firm Gate 2 connection offer. The seven year implementation period has been fully considered in the EIA for the Scheme.<br><br>Whilst the Applicant intends to commence development as soon as reasonably practicable, the timing of grid connection remains subject to matters outside the Applicant's control, including the delivery of National Grid's |

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| | | planned Weston Marsh B Substation and wider network connection processes.<br><br>In these circumstances, the Applicant considers that the seven-year commencement period, and the corresponding seven-year period for the exercise of compulsory acquisition powers under Article 22, are appropriate and proportionate.<br><br>In response to the Section 51 advice from the Planning Inspectorate [PD-002], the Applicant submitted a **Sensitivity Analysis - Connection to the National Electricity Transmission Network** [AS-029] to provide further information on how the assessment of likely significant environmental effects would be affected in the event of a delay in the delivery of the Scheme from that assumed in the ES assessment scenarios (as outlined in Table 4-2 of ES **Chapter 4: Overview of the EIA Process** [APP-055]) which form the basis of **ES Chapters 5-16** [APP-056 to APP-067]. In conclusion, no new or different likely significant effects were identified. |
| **LCC-015**<br>Connection reform uncertainty | Notwithstanding, there is an acceptance from the applicant at paragraph 5.2.69 of the Planning Statement [APP-260] that there is uncertainty across the energy industry as to final connection dates and application rounds. At paragraph 5.2.71, the applicant states that NESO have indicated there will be further | The Applicant notes this comment. As outlined above, the Applicant acknowledges the uncertainty associated with the NESO grid connection reforms. |

| Topic | Matter Raised | Applicant's Response |
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| | opportunities to reapply, indicating that there is potential for spare capacity once initial offers are confirmed and/or there is further certainty in respect of the capacity and timeframes of the upgraded grid infrastructure – but implicit in this NESO statement is that there is still some level of uncertainty in respect of capacity and timeframes. Whilst the applicant considers that they are a good candidate for next Gate 2 offer round and see no clear reason why a network connection would not be granted, the connections reforms process is uncertain. | |
| **LCC-016**<br>Weston Marsh B deliverability | The Council acknowledges the proposed timescales for both projects. However, the Meridian Solar Farm project is contingent upon the Weston Marsh B substation being granted DCO consent and being delivered within the timeframe indicated by National Grid. The certainty of a grid connection being available and therefore the overall deliverability of the project is a concern for the Council, and this matter will be expanded upon in our LIR. | The Applicant notes this concern. For the avoidance of doubt, the Applicant intends to submit a Gate 2 application at the earliest possibility. The exact dates for future application rounds will be confirmed by NESO once there is greater clarity on the available connection capacity of the relevant grid infrastructure beyond 2030.<br><br>Paragraph 4.11.6 of EN-1 recognises that "applicants may wish to take a commercial risk where they have not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application. In this situation applicants should provide information as part of their application confirming that there is no obvious reason why a network connection would not be possible". Paragraph 5.2.71 of the **Planning Statement** [APP-260] explains why the Scheme would be a |

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| | | good candidate for a Gate 2 offer and demonstrates that there is no clear reason why a network connection (Gate 2 offer) would not be granted by NESO as part of the next available application round or for the period beyond 2035.<br><br>The position of the Applicant is not unusual in the context of the Connection Reforms process, and several renewable energy DCOs have been granted over the past year subject to similar uncertainty as to the outcomes of that process. It is ultimately the commercial risk of the Applicant to proceed subject to a final formal offer, and in the very unlikely circumstance that such an offer is not received (for the reasons outlined above) the DCO would not be implemented. |
| Minerals and Waste | | |
| **LCC-017**<br>Safeguarding | As identified in the applicant's Minerals Safeguarding Assessment (MSA) [APP-266], the project proposals intersect with a Minerals Safeguarding Area (MSAs) identified in the Lincolnshire Minerals and Waste Local Plan (LMWLP) for sand and gravel. The area of intersection is relatively small, occupying the southwest corner of Solar Development Area A, to the west of Lodge Farm. Whilst the MSA mentions the 'temporary' nature of the development (40 years), the Council notes that the submission is not reliant on this | The Applicant notes and welcomes the Council's position in relation to the Scheme's impact on safeguarded minerals. |

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| | argument. Instead, that the Applicant makes reference to LMWLP Policy M11 that:<br>• Prior extraction of the mineral would be impracticable – Given the shallow nature of the scheme.<br>• Overriding need… and the development could not reasonably be sited elsewhere – They state that their Planning Statement shows that 'the scheme is urgently required' and that their Site Selection Report demonstrates why this is the best place.<br>• The development is of a minor nature which would have a negligible impact with respect to sterilising the mineral resource – Again, due to the shallow nature of the deposits.<br>No part of the site intersects or encompasses any existing or allocated waste sites.<br>In light of the above summary and limited extent of intersection with the MSA, on the basis of the application as submitted, it is unlikely that the Council would object to the proposal on minerals or waste safeguarding grounds. The Council has no further comments on minerals and waste safeguarding at this | |

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| | stage. However, if there is need for a further update on this topic then this will be included in the LIR. | |
| **LCC-018**<br>Waste Management | The Applicant proposed that waste would be 'scoped out' of the EIA. However, we note, and welcome the fact that, the Planning Inspectorate disagreed, specifying various waste information which they would want to see in the Environmental Statement (ES), including:<br>• Waste forecasts – 'Estimates, by type and quantity' for construction, operation & decommissioning phases.<br>• Waste impacts – 'An assessment of likely significant effects arising from the transportation and disposal of waste'<br>• Hazardous waste – 'What measures, if any, are in place to ensure that components (e.g. from batteries and / or panels) are able to be diverted from the waste chain and disposed of safely given that some types of solar panels can contain hazardous materials'<br>• 'Cumulative impacts to be assessed at decommissioning due to a number of solar farms in the local area also likely to be decommissioned in a similar timescale'. | It is noted that construction waste (Table 16-28) does not take account of PV panels and other WEEE damaged during this phase, this is expected to be minimal and an assumed 0.2% failure rate per year for solar panels can also be applied to construction, as applied during operation. Ad hoc replacement of solar PV panels based on a failure rate of 0.2%, would equate to 274 $m^3$ per year and minimal associated wood pallets, plastic and cardboard packaging waste. An additional 274 $m^3$ of construction waste would not change the outcome of the construction waste assessment, the percentage of inert and non-hazardous landfill capacity remains at 0.27%. The quantities of waste to be disposed of to landfill from construction are still anticipated to be below 1% of regional inert and non-hazardous landfill capacity. Therefore, the magnitude of impact remains negligible, and the effect is slight, which is considered to be not significant.<br>As outlined in paragraph 16.6.76 of **ES Chapter 16 Other Environmental Topics** [APP-067] recycling routes are generally available for component replacement waste at present, and it is likely that there will be even greater opportunities for recycling in the future for the operational and decommissioning phases of the Scheme, not least because the recycling market will have expanded to meet |

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| | In light of this, the Council welcome that the applicant has referenced the topic in several documents, including:<br>• ES Chapter 16 Other Environmental Topics [APP-067] –includes various references to waste matters, including the waste hierarchy and proximity principle, and note the following from section 16.6.<br>  ○ Tables 16-12 and 16-13 – The Applicant has specifically addressed the matters raised in the scoping (see above) and consultation phases, mostly by cross-referencing to elsewhere in section 16.6.<br>  ○ The waste impacts have been assessed on the assumption of landfilling. Whilst this is in line with standard methodology, the applicant should make every effort to follow the waste hierarchy for all waste streams.<br>  ○ Construction waste (Table 16-28) – The forecasts have failed to take account of PV panels and other WEEE damaged during this phase.<br>  ○ PV panel failures (16.6.75) – The assumed 0.2% failure rate is reasonable, | demand as the number of solar PV installations in the UK increases.<br>As outlined in paragraph 16.6.102 of **ES Chapter 16 Other Environmental Topics** [APP-067] the cumulative waste assessment focuses on decommissioning waste because the peak of waste generation would be during decommissioning, and this is therefore the worst case in terms of waste generation. Operational waste generation is not expected to be concurrent for all schemes, given that their solar PV panels and other components would have different design lives, and it is very unlikely that all schemes would replace their equipment at the same time. |

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| | provided this is the annual rate (not explicitly stated).<br>○ PV panel replacement (16.6.75) – The applicant anticipates one full replacement programme. In line with the waste hierarchy, as much as possible of the waste arising from this replacement programme should be repaired or recycled, but the Council would highlight that sufficient capacity for this does not exist at present and cannot be relied upon to appear.<br>○ Decommissioning waste (from 16.6.86) – we remain concerned over capacity to process this, particularly the quantity of PV panels arising cumulatively alongside other similar projects.<br>○ Cumulative waste arisings (Table 16-30) –The applicant has provided this and included waste tonnage forecasts for numerous projects, albeit it only appears to include decommissioning waste rather than all waste generated at all phases.<br>• Outline Construction Environmental Management Plan (oCEMP) [APP-275], Outline | |

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| | Operational Environmental Management Plan (oOEMP) [APP-276] and Outline Decommissioning Environmental Management Plan (oDEMP) [APP-277] | |
| **LCC-019**<br>Site Waste Management Plan | The Council will wish to review and be consulted on the final CEMP, OEMP and DEMP when it is produced. These documents must include waste arisings forecasts and details of how waste will be managed in accordance with the waste hierarchy. The Council also awaits the Site Waste Management Plan (SWMP), which should be updated and followed for each phase of the project, including waste arisings forecasts and proposed fate (e.g. recycling) so that feasibility can be assessed. The Council welcomes the commitment within the oDEMP to cooperate with other projects in the management of cumulative waste arisings. | The Applicant notes the Council's request to be consulted on the final management plans. Under Schedule 2 to the **draft DCO** (Doc Ref. 3.1 Rev 2), Lincolnshire County Council is the relevant planning authority for the approval of the Waste Management Plan required pursuant to Requirement 14. In addition, Lincolnshire County Council must be consulted on the approval of the Construction Environmental Management Plan pursuant to Requirement 12, the Operational Environmental Management Plan pursuant to Requirement 13, and the Decommissioning Environmental Management Plan pursuant to Requirement 21.<br><br>Requirement 12 further requires the Construction Environmental Management Plan to include a Site Waste Management Plan that must be substantially in accordance with the Outline Site Waste Management Plan and implemented as approved. Requirement 14 requires a Site Waste Management Plan to be submitted to and approved by Lincolnshire County Council prior to operation of the authorised development. |

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| | | The Applicant therefore considers that the draft DCO (Doc Ref. 3.1 Rev 2) contains appropriate mechanisms for Lincolnshire County Council's involvement in the approval of the relevant management plans and waste management measures. |
| **LCC-020**<br>Solar panel recycling capacity | The Council will have some points of detail in relation to the lack of current capacity for recycling solar panels, particularly at decommissioning, but also with operational failures and cumulative impacts alongside other proposed NSIP-scale solar farms, particularly in terms of waste management capacity. These will be addressed in the LIR and through discussions with the applicant. | As outlined in paragraph 16.6.76 of **ES Chapter 16 Other Environmental Topics** [APP-067] recycling routes are generally available for component replacement waste at present, and it is likely that there will be even greater opportunities for recycling in the future for the operational and decommissioning phases of the Scheme, not least because the recycling market will have expanded to meet demand as the number of solar PV installations in the UK increases. The Applicant welcomes further discussion with the Council on these matters and will provide its response to the LIR in due course. |
| Cultural Heritage | | |
| **LCC-021**<br>Archaeology | The Council is broadly satisfied that the work undertaken to date has been completed to the required standards and has provided a solid understanding of the archaeological potential, significance and likely impact arising from the proposed Meridian Solar Farm scheme. | The Applicant welcomes these comments and has no further comments to make on this matter. |
| **LCC-022**<br>Archaeological | The Council feels greater clarification is needed regarding the application of significance / importance, | The methodology of how the significance and importance of heritage assets has been determined is presented in |

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| significance assessment | the omission of substantial harm within the temporary impacts and details of the justification regarding substantial / less than substantial harm as applied to the residual impact assessment. We are disappointed that there is no outline Archaeological Mitigation and Management Plan (AMMP) included with the DCO application and expect this to be submitted prior to the end of the examination period to allow its inclusion and discussion within the DCO hearings and/or subsequent deadlines. | Section 8.4 Assessment Methodology of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) (paragraphs 8.4.17 – 8.4.23). The methodology has been determined in accordance with applicable national policy and guidance which is detailed within this section of the chapter. The methodology and its application within the assessment also recognise that cultural significance (value) of a heritage asset is separate to its importance, which is a measure of the degree to which the cultural significance is protected through legislation and policy. Statements detailing the significance of potentially impacted assets are presented in **ES Chapter 8: Cultural Heritage, Section 8.7** (Doc Ref. 6.1 Rev 1).<br><br>Both NPS EN-1[10] and the NPPF[11] relate impacts affecting the cultural significance (value in EN-1) of heritage assets to harm. In line with applicable policy and guidance, following precedent set through previous Nationally Significant Infrastructure Projects (NSIP) applications and for the purpose of the assessment, "substantial harm" is defined as the total or near-total permanent loss of an asset's cultural |

[10] Department for Energy Security and Net Zero (2025) Overarching National Policy Statement for energy (EN-1). Available at: https://assets.publishing.service.gov.uk/media/695d1015f41883f4e50ed9ab/overarching national-policy-statement-for-energy-en-1-web-accessible.pdf [Accessed 29/07/2026]

[11] Department for Levelling Up, Housing and Communities (2024) National Planning Policy Framework. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [Accessed 29/07/2026]

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| | | significance. As substantial harm has been defined as the permanent loss or near total loss of the significance of cultural significance, where an impact is temporary, either during construction or the operational lifetime of the Scheme, this is considered less than substantial harm. Paragraph 8.4.31 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) has been updated at Deadline 1 to clarify this point.<br><br>The assessment of harm at the residual (post-mitigation) stage is undertaken following the same definition of substantial harm. As detailed in Section 5 of the **Planning Statement – Appendix E Heritage Statement of Harm** (Doc Ref. 7.1 Rev 1), the Scheme has the potential to have a significant effect on the heritage assets presented. However, when considering the archaeological deposits in their totality, the works will not result in the total or near-total permanent loss of their cultural significance, as archaeological deposits outside of the works areas will be preserved in situ.<br><br>To produce an informed and robust Outline Archaeological Mitigation and Management Strategy (OAMMS), the Applicant required the full archaeological evaluation report, including specialist analysis of artefacts and environmental deposits to be complete. The **OAMMS** (Doc Ref 8.7) has now been prepared in consultation with LCC and Historic England and submitted for Deadline 1. This approach was |

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| | | discussed and agreed with LCC and Historic England in the pre-application stage.<br><br>There has been an effective programme of desk-based and non-intrusive surveys completed for the Site prior to submission of the Application. The Applicant has completed the **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1), **ES Appendix 8-2: Historic Environment Desk Based Assessment** [APP-182 to APP-201], aerial assessment presented within **ES Appendix 8-2: Historic Environment Desk Based Assessment - Appendix C** [APP-185] and geophysical survey presented within **ES Appendix 8-2: Historic Environment Desk Based Assessment - Appendix D.1 -D.2** [APP-186 to APP-196] to the appropriate standards set out by the Chartered Institute for Archaeologists, Historic England and the Lincolnshire Archaeology Handbook.<br><br>The **draft DCO** (Doc Ref 3.1 Rev 2) secures the submission, approval and implementation of archaeological mitigation through Requirement 11 (Archaeology). Requirement 11 provides that no part of the authorised development may commence until a final Archaeological Mitigation and Management Plan and site-specific Written Scheme of Investigation have been submitted to and approved by the relevant planning authority. Requirement 11 further requires that those documents must be substantially in |

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| | | accordance with the OAMMS and implemented as approved.<br><br>The Applicant therefore considers that the **draft DCO** (Doc Ref 3.1 Rev 2) contains appropriate provisions to secure archaeological mitigation and management. |
| **LCC-023**<br>Baseline archaeological surveys | There has been an effective programme of desk-based and non-intrusive surveys completed for the site prior to submission of the Application. The Applicant has completed the Environmental Statement chapter (Volume 6 Environmental Statement 6.1 ES Chapter 8: Cultural Heritage), desk-based assessment (Volume 6 Environmental Statement 6.3 ES Appendix 8-2: Historic Environment Desk Based Assessment), aerial assessment (Volume 6 Environmental Statement 6.3 ES Appendix 8-2: Historic Environment Desk Based Assessment - Appendix C) and geophysical survey (Volume 6 Environmental Statement 6.3 ES Appendix 8-2: Historic Environment Desk Based Assessment - Appendix D.1 - Parts 1-10 and Appendix D.2) to the appropriate standards set out by the Chartered Institute for Archaeologists, Historic England and the Lincolnshire Archaeology Handbook. In particular, we commend the quality of the Geophysical Survey and the Aerial Photographic and LiDAR Assessment. | The Applicant welcomes these comments and has no further comments to make on this matter. |

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| **LCC-024**<br>Operational and decommissioning archaeology mitigation | We would draw attention to the ES Chapter 8 Section 8.9 Assessment of Potential Impacts and Likely Significant Effects and require corrections. The sources of impact from the Operational Phase shall be managed through mitigation set out within the forthcoming AMMP, not the oOEMP (Section 8.9.7). Equally, the management of archaeological impacts from the decommissioning phase will be covered in the AMMP and overseen by the Archaeological Clerk of Works (ACoW), not the oDEMP (Section 8.9.9 and 8.9.10). | **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) Section 8.9, the **OOEMP** (Doc Ref. 7.11 Rev 1) and the **ODEMP** (Doc Ref. 7.12 Rev 1) have been updated at Deadline 1 to reflect this comment. |
| **LCC-025**<br>Archaeological field evaluation | The archaeological field evaluation (Volume 6 Environmental Statement 6.3 ES Appendix 8- 2: Historic Environment Desk Based Assessment - Appendix E Volume 1 and Appendix E Volume 2 Parts 1-2) undertaken to date has recorded a number of areas of archaeological interest dating from the later prehistoric period through to the post-medieval period and has successfully characterised and dated many of the features identified from the desk-based, aerial and geophysical assessments | The Applicant welcomes these comments and has no further comments to make on this matter. |
| **LCC-026**<br>Archaeological field evaluation | We welcome the syntheses of baseline survey data and field evaluation results into Consolidation of Solar Development Areas Baseline Data and Identification of Archaeological Zones report (Volume 6 Environmental Statement 6.3 ES Appendix 8-2: | |

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| | Cultural Heritage Desk Based Assessment - Appendix F). The document makes a valuable contribution to understanding the site as a whole and permits multiple strands of evidence to be distilled into a readily usable format. | |
| **LCC-027** Embedded archaeological mitigation | This has allowed the archaeological data to inform design and has, on balance, taken into account areas of dense, complex and significant archaeology within the embedded mitigation. The embedded mitigation has been developed following the programme of non-intrusive and intrusive archaeological assessment and has facilitated the integration of mitigation into the designs at an early stage. | |
| **LCC-028** Archaeological Mitigation and Management Plan | Our initial review of the Draft Development Consent Order (EN010169 Volume 3 Draft DCO 3.1 Draft Development Consent Order) (dDCO), wording is that the Archaeological Requirement should be entitled 'Archaeological Mitigation and Management Plan'. The potential for impact on archaeological remains does not end at the construction phase. Impacts may arise during the operational or decommissioning stages and the ongoing management of the archaeological resource are included within the Environmental Mitigation and Commitments Register (EN010169 Volume 7 Other Documents 7.7 Environmental Mitigation and Commitments Register), as will the | The Applicant considers that Requirement 11 (Archaeology) appropriately secures archaeological mitigation and management throughout the lifecycle of the Scheme. In particular, Requirement 11 requires the submission and approval of a final Archaeological Mitigation and Management Strategy and site-specific Written Scheme of Investigation prior to commencement of the relevant part of the authorised development, with those documents to be implemented as approved.<br><br>The Applicant notes LCC's preference for the title "Archaeological Mitigation and Management Plan" to reflect the long-term management of the historic |

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| | continued advancement of public benefit and engagement from archaeology and heritage throughout the lifetime of the scheme. Therefore, we consider 'Archaeological Mitigation and Management Plan' to be a more appropriate title within the dDCO to reflect the long-term management of the historic environment and to align better with the nomenclature for management plans of other topics. Further comment on the Requirement wording will be made in due course. | environment. However, the Applicant does not consider that the title of the requirement affects its operation or the scope of the controls secured by the **Draft DCO** (Doc Ref. 3.1 Rev 2). The Applicant has adopted this approach to maintain consistency across DCO Application documents and to minimise potential confusion and incorrect cross-referencing across documents due to updates to terminology.<br>The Applicant will continue to engage with Historic England and LCC regarding the content of the **OAMMS** (Doc Ref. 8.7) and any detailed drafting comments on Requirement 11 as the examination progresses. |
| **LCC-029**<br>Heritage Harm Statement | There is a need for further information and clarity over portions of the Heritage Harm Statement (Other Documents 7.1 Appendix E: Heritage Harm Statement). The document lacks details on how conclusions have been reached and limited justification has been included where assessing the impact and harm to heritage assets. Potential underestimation of significance has also been identified, such as the deposits within the northern section of the Grid Connection Route, with Palaeolithic and Mesolithic activity identified here | The details of the impact assessment methodology, significance of heritage assets and conclusions regarding the potential impact of the Scheme are presented in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1). **Appendix E: Heritage Statement of Harm** of the **Planning Statement** (Doc Ref 7.1 Rev 1) has been produced as a summary of where the Scheme may result in harm to designated heritage assets or those assets demonstrably of national importance only. **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1). and **Appendix E: Heritage Statement of Harm** of the **Planning Statement** (Doc Ref 7.1 Rev 1) |

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| | from surveys and Historic Environment Records and ascribed a moderate significance (Section 4.1.8) but lacking data from intrusive evaluation which could establish a higher significance for these regionally scarce types of remains. | cross reference to avoid repetition and should be read in conjunction with each other.<br><br>The area to the north of High Road (in the Grid Connection Route) has been included within the statement in recognition that the full cultural significance of the archaeological deposits has not been evaluated at this stage. The Applicant has checked and reconfirmed there are no records of heritage assets of Palaeolithic and Mesolithic date within the Grid Connection Route and its study area and the assessment concludes that the potential for finding archaeological deposits of this date is low. However, the aerial photography survey has recorded a grouping of features, the morphology of which may be indicative of early prehistoric activity. Should these features be proven to be of early prehistoric date their rarity in this geographic area would contribute to their cultural significance. Given the information available and studies undertaken to date, the Applicant is confident that attributing a level of medium importance ("Non-designated assets of regional or high local importance with potential to contribute significantly to regional and local research objectives") is appropriate. Further text regarding the cultural significance of early prehistoric archaeological deposits within the Grid Connection Route has been included in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1 paragraph 8.7.31) and the **Appendix E: Heritage Statement of Harm** of the |

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| | | **Planning Statement** (Doc Ref. 7.1 Rev 1 paragraph 4.1.8) for clarity. |
| **LCC-030**<br>Archaeological Clerk of Works | Regarding the Environmental Mitigation and Commitments Register (EN010169 Volume 7 Other Documents 7.7 Environmental Mitigation and Commitments Register Section 1.1.5), we consider Archaeological Mitigation and Management Plan more appropriate than Archaeological Mitigation and Management Strategy, as is covered in Table 2-1: Summary of Environmental Mitigation and Commitments section CH-4. The Archaeological Clerk of Works should be added to the final column as appropriate, with responsibility for delivery across the Construction, Operation and Decommissioning phases. | A final Archaeological Mitigation and Management Plan and site-specific Written Scheme of Investigation is<br><br>to be produced post-DCO consent in accordance with the relevant requirement of the **Draft DCO** (Doc Ref. 3.1 Rev 2), whilst an **OAMMS** (Doc Ref. 8.7) has been prepared and is submitted at Deadline 1. The Applicant has adopted this approach to maintain consistency across DCO Application documents and to minimise potential confusion and incorrect cross-referencing across documents due to updates to terminology.<br><br>The Archaeological Clerk of Works has been added to the monitoring column of Cultural Heritage section of the **Environmental Mitigation and Commitments Register** (Doc Ref. 7.7 Rev 1). |
| **LCC-031**<br>Public Archaeology and Engagement Strategy | The Council would welcome the inclusion of the Public Archaeology and Engagement Strategy within the Commitments Register. Consideration of enhancement of the historic environment is invaluable in balancing the impacts of any development proposal and interest in archaeology, particularly any remains which have been found locally, can be massive and, if done well, can have the potential to foster high amounts of positive publicity and public benefits. | Commitment to a Public Archaeology and Engagement Strategy has been added to the **Environmental Mitigation and Commitments Register** (Doc Ref. 7.7 Rev 1) (refer to Table 2-1, section CH4) and the **OAMMS** (Doc Ref. 8.7) submitted at Deadline 1. |

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| **LCC-032**<br>Historic environment information boards | The Council would appreciate involvement in the historic environment content creation of the information boards adjacent to the new permissive path which would follow the boundary of the Scheduled Monument at Cate's Cove Corner (Commitments Register Table 2.1 Section HH-1). | The commitment to Lincolnshire County Council's involvement in the historic environment content creation of the information boards has been added to the **Environmental Mitigation and Commitments Register** (Doc Ref. 7.7 Rev 1) (refer to Table 2-1, section CH4) and the **OAMMS** (Doc Ref. 8.7) submitted at Deadline 1. |
| **LCC-033**<br>Heritage Harm Statement | Overall, consultation and communication have been effective and timely, with feedback and comments incorporated into the documents. This has benefitted the archaeological assessment, improved the methodology employed and enhanced the end output. The Council is satisfied with the desk-based elements of the submitted application documents, with the caveat that there are improvements needed for the Commitments Register (EN010169 Volume 7 Other Documents 7.7 Environmental Mitigation and Commitments Register Section 1.1.5) and the Heritage Harm Statement (Other Documents 7.1 Appendix E: Heritage Harm Statement). | The Applicant welcomes the response from LCC.<br>**OAMMS** (Doc Ref. 8.7) has been prepared and is submitted at Deadline 1. The document includes details of archaeological constraints, additional fieldwork to be undertaken and mitigation to be undertaken during pre-construction, operational maintenance and decommissioning phases. The requirement and responsibilities for an Archaeological Clerk of Works during the operational and decommissioning phases will be confirmed in the detailed Archaeological Mitigation and Management Strategy (AMMS). Reference to undertaking works in accordance with the detailed AMMS and monitoring by an Archaeological Clerk of Works, if required, has been included within the **OOEMP** (Doc Ref. 7.11 Rev 1) and the **ODEMP** (Doc Ref. 7.12 Rev 1). Cross reference to the **OAMMS** (Doc Ref. 8.7) and works to be supervised by an Archaeological Clerk of Works, where |
| **LCC-034**<br>Outstanding cable route fieldwork | There are some outstanding fieldwork requirements, primarily for the cable routes. We are content for these to be undertaken post-DCO and the results incorporated into the final archaeological mitigation and management plan. | |

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| **LCC-035**<br>Archaeological Clerk of Works | The Council is pleased to see that cultural heritage is included within the Outline Construction Environmental Management Plan (Volume 7 Other Documents 7.10 Outline Construction Environmental Management Plan), the Outline Operational Environmental Management Plan (Volume 7 Other Documents 7.11 Outline Operational Environmental Management Plan) and the Outline Decommissioning Environmental Management Plan (Volume 7 Other Documents 7.12 Outline Decommissioning Environmental Management Plan). The Council would advise including the role and responsibilities of the Archaeological Clerk of Works within these management plans to ensure adequate consideration and awareness of the ACoW is built into the post-DCO scheme for the entirety of its lifespan and decommissioning stages. | required, has been added to the **OSMP** (Doc Ref. 7.14 Rev 1). |
| **LCC-036**<br>Soil Management Plan and archaeology | There is no mention or cross-reference to the archaeological management or mitigation within the Outline Soil Management Plan (oSMP) (Volume 7 Other Documents 7.14 Outline Soil Management Plan). Given the potential for soil management to disturb archaeological remains, we would advise that the Archaeological Mitigation and Management Plan and ACoW is embedded within the oSMP. | |

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| **LCC-037**<br>LEMP archaeology coverage | The Outline Landscape and Ecology Management Plan (Volume 7 Other Documents 7.16 Outline Landscape and Ecology Management Plan) has appropriate coverage of the archaeological management requirements and we are satisfied with the provision here. | |
| **LCC-038**<br>Overall, the Council is optimistic regarding the approach | Overall, the Council is optimistic regarding the approach and work undertaken on archaeological considerations for the Meridian Solar Farm scheme. Further work and improvements have been identified, which will be set out in greater detail in the Local Impact Report, but we are confident that through collaborative and constructive partnership, the scheme can enhance and protect the archaeological resource within the Meridian Solar scheme. | |
| **LCC-039**<br>Built Heritage | The Council welcome the continued engagement on built heritage and historic landscape matters. This includes the response to earlier consultation comments, particularly the extension of the Grid Connection Route study area from 1km to 2km and the continued flexibility to consider higher significance designated heritage assets up to approximately 5km where their setting may be affected. | The Applicant has met with LCC Built Heritage officer on 19 August 2026 and will continue to seek agreement on the assessment through the **Statement of Common Ground with LCC** (Doc Ref. 8.11).<br><br>Additional assessment of the potential effect of the Scheme on the group value of the historic farmsteads is to be produced with reference to LCC's Historic Farmsteads Group Value Framework for NSIPs. The assessment is being |

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| **LCC-040**<br>Overhead line visual impact | Further engagement would be welcomed on setting effects arising from tall or visually prominent infrastructure, including pylons, overhead lines, BESS compounds, substations and above-ground infrastructure associated with the inter-array connections. Where relevant assessment, ZTV and visual material has already been provided, it should be clearly signposted within the examination material. Scoping decisions should be transparent and consistent, particularly where setting, intervisibility or historic landscape legibility contributes to significance. | prepared and will be presented within the **Historic Farmstead Group Value Assessment** to be submitted at Deadline 2. |
| **LCC-041**<br>Overhead line visual impact | The ES identifies residual significant effects in relation to several heritage receptors, including the historic landscape of the former precinct of Crowland Abbey and the Wykeham Chapel heritage group. Regarding Wykeham, we previously identified the need for proportionate consideration of the designated heritage group comprising the Grade I listed Chapel of St Nicholas, the Scheduled Monument and associated listed buildings, including key views, glimpses, intervisibility and wider setting relationships. We note that this receptor group has been included within the ES assessment and would welcome continued engagement on detailed siting and micro-siting in this area, particularly where pylon placement, overhead | |

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| | line alignment or cumulative infrastructure may affect how the heritage group is experienced. | |
| **LCC-042**<br>Non-designated heritage assets | Several non-designated heritage assets are within, or close to, the proposed scheme. The Council previously advised that the Greater Lincolnshire Historic Farmstead Character Statement and Lincolnshire Historic Landscape Characterisation should be more fully integrated into the baseline and assessment narrative, particularly when assessing nondesignated rural heritage assets and wider landscape context. We note the response that historic farmstead information and Historic Landscape Characterisation have been used to inform the baseline, and that effects on historic farmsteads have been assessed. For completeness and consistency with other NSIP examinations in Lincolnshire, we ask that consideration is given to applying LCC's Historic Farmsteads Group Value Framework for NSIPs. This framework has been accepted in examination and used on other NSIP schemes in the county. Its use here would assist in providing a consistent and proportionate approach to the assessment of historic farmstead group value, particularly where dispersed farmsteads, associated field patterns, routeways and open rural setting contribute collectively to historic landscape character. | |

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| **LCC-043**<br>Further asset review | Where appropriate, a more detailed asset review of the ES will be provided through the LIR. | |
| **LCC-044**<br>Heritage specialist meeting | The Council would welcome a meeting with the applicant's heritage specialists before the LIR is finalised. This would provide an opportunity to discuss the built heritage and historic landscape matters raised in this representation, hear the project team's views on any potential heritage issues and clarify any points relating to the submitted assessment material. Early discussion would help ensure that any outstanding matters are understood before the LIR is submitted and may reduce the need for later clarification during examination. | The Applicant has met with LCC Built Heritage officer on 19 August 2026 and will continue to seek agreement on the assessment through the **Statement of Common Ground with LCC** (Doc Ref. 8.11). |
| Transport and Access | | |
| **LCC-045**<br>Transport and Access | The Council, in its capacity as Highways Authority, has reviewed the application documents for this proposal.<br>ES Chapter 15: Traffic and Access [APP-066] provides most of the highway assessment information, there is a supporting Transport Assessment Note, but this only covers Collision Data. These documents do not cover the same scope as a standard Transport Assessment, | The Applicant notes the Highway Authority's comment. The assessment methodology adopted for the Scheme is based on the ISEP Environmental Assessment of Traffic and Movement guidance[12] and focuses on the environmental effects of traffic and transport movements arising from the Scheme. The scope and methodology of **ES Chapter 15: Traffic and Access** [APP-066], together with the supporting |

[12] Institute of Sustainability and Environmental Professionals (ISEP), 2023. Environmental Assessment of Traffic and Movement. Lincoln: ISEP. Available at: https://www.isepglobal.org/resources/blogs/2023/07/12/isep-guidance-ea-of-traffic-and-movement/. Accessed 30 July 2026.

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| | there are no flow or turning calculations at the proposed key site access junctions and these need to be provided | transport documentation [APP-014, APP-015, APP-016, APP-017, APP-077, APP-159, APP-161, APP-162, APP-163, APP-165, APP-249, APP-250, APP-251, APP-253, APP-278, APP-279 and APP-281], were developed through ongoing consultation with Lincolnshire County Council (LCC), National Highways (NH) and Peterborough City Council (PCC).<br><br>A dedicated transport update/scoping meeting was held on 18 September 2025 with LCC, NH, PCC and South Holland District Council to review the proposed assessment methodology, assumptions, trip generation, trip distribution and study area for the ES assessment. **ES Chapter 15** [APP-066] confirms that the Traffic and Access Study Area, as shown on **ES Figure 15-1** [APP-159], was discussed and agreed with the relevant highway authorities and NH at this meeting. Furthermore, the proposed assessment methodology, construction traffic routing strategy and vehicle movement assumptions were presented through the stakeholder engagement process, with no specific concerns raised regarding the proposed assessment approach.<br><br>As part of these discussions, it was agreed that a Transport Assessment Note (TAN) (provided within **ES Appendix 15-4** [APP-251]) would be prepared in place of a standalone Transport Assessment. The purpose of this approach was to avoid unnecessary duplication of information across the |

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| | | Environmental Statement and associated application documents. The TAN explains the agreed approach and signposts where information typically contained within a Transport Assessment is addressed across **ES Chapter 15: Traffic and Access** [APP-066], the **OCTMP** [APP-278] and other supporting documents (as per the list of referenced documents within the first paragraph of this response).<br><br>The Applicant therefore does not agree that the assessment information submitted is materially different in scope from that which would typically be provided, or what was considered during the scoping process. The submitted Transport and Access documents include construction trip generation, trip distribution, traffic flow assessments, routing strategies, baseline traffic conditions, traffic impact assessments, access arrangements, visibility information and swept path assessments. Traffic flows (including turning flows at site accesses), trip generation, trip distribution and a highway impact assessment are provided within **ES Chapter 15: Traffic and Access** [APP-066]. |
| **LCC-046**<br>Worker trip rates and shuttle buses | The assessment set out in APP-066 is generally accepted, the trip rates for workers (Table 15-13) seem appropriate, although the 55% modal split by shuttle bus seems quite high and needs further justification especially how shuttle buses will be enforced through construction. The distribution seems | The Applicant notes Lincolnshire Country Council's comment. The Applicant considers the assumption that 55% of construction workers will travel by shuttle bus, with the remaining 45% travelling by private vehicle, to be both reasonable and robust for the purposes of the ES assessment, whilst also reflecting the Applicant's |

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| | appropriate and the link flow impacts are shown in Table 15-21. | commitment to actively managing workforce travel demand.<br><br>This assumption has been informed by experience from comparable large-scale solar NSIP projects, including two consented schemes in Lincolnshire. These include the Cottam Solar Project, which adopted a construction worker modal split of 50% shuttle bus and 50% private car for a peak construction workforce of approximately 650 workers, and the Tillbridge Solar Project, which adopted a modal split of 47% shuttle bus and 53% private vehicle for a peak construction workforce of approximately 1,225 workers.<br><br>The Applicant's assumption of 55% shuttle bus usage for a peak construction workforce of approximately 855 workers is therefore considered reasonable and proportionate, particularly noting that the resulting private vehicle demand would remain significantly lower than that associated with the consented Tillbridge Solar Project. The approach is consistent with workforce travel management strategies accepted on comparable nationally significant solar projects and reflects lessons learned from the implementation of those schemes.<br><br>The Applicant considers that a slightly higher proportion of shuttle bus usage than that assumed in the above schemes is achievable for the Scheme due to the existence of nearby population centres for local workforce and the anticipated |

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| | | requirement for a significant proportion of the workforce to be accommodated within local accommodation hubs in such centres during peak construction periods.<br><br>The proposed modal split would be facilitated through the provision of dedicated shuttle bus services, coordinated pick-up and drop-off arrangements at Site compounds, and implementation of the workforce travel measures outlined within the **OCTMP** [APP-278]. These measures would be confirmed by the appointed Contractor prior to commencement of any works associated with the construction phase. Further details would be developed through the Detailed CTMP, with measures expected to include, but not be limited to:<br><br>• Dedicated shuttle bus services operating between workforce accommodation locations and the Site (with potential consideration given to park-and-ride facilities if deemed necessary);<br>• Shuttle service aligned with construction shift patterns;<br>• Workforce travel management measures, including travel information and promotion of shuttle bus usage as the preferred mode of travel;<br>• Restrictions on private vehicle usage by promotion of the shuttle service; |

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| | | • Parking management measures, including restraint on staff parking provision levels;<br>• Contractor obligations enforcing compliance with workforce travel arrangements; and<br>• Monitoring and review of workforce travel patterns, with corrective measures introduced where necessary.<br>The Applicant therefore considers that the combination of dedicated shuttle bus provision, parking controls, contractor obligations and ongoing monitoring provides a reliable and enforceable mechanism for achieving the forecast modal split and limiting private vehicle trips associated with the construction phase workforce. The approach is consistent with that adopted on comparable solar NSIP projects and forms a key component of the Scheme's construction traffic management strategy. |
| **LCC-047**<br>Construction access and HGV routing | Figure 2-5 [APP-077] shows the access points and proposed routeings for HGVs and AILs. The site is proposed to be accessed mainly from key junctions on the A151 and A16, with a further access at Martins Road. There would then be construction roads through the site which cross existing local highways. | The Applicant notes Lincolnshire County Council's comments regarding Accesses HR 01 and HR 02 and the potential operation of these accesses as a crossroads arrangement on the A151.<br>It should be noted that HR 01 and HR 02 serve separate sections of the Grid Connection Route and are located within different construction work zones. Accordingly, there is no requirement for construction traffic to travel directly between the two accesses and therefore no |
| **LCC-048**<br>Outline CTMP mitigation | The Outline Construction Traffic Management Plan (oCTMP) [APP-278-9] outlines mitigations proposed to be controlled by the Contractor (Hours of working, | |

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| | HGV routing, shuttle buses, compound locations etc). Also included are drawings of all the access points with swept path analysis. | straight-through movements are anticipated between HR 01 and HR 02.<br><br>During construction of the Scheme, HR 01 and HR 02 combined are anticipated to experience a peak daily total of approximately 173 two-way vehicle movements (arrivals and departures), as shown in the 24hr Dev column of the Total Vehicle Traffic Flows - Future Baseline vs. Development table in **ES Appendix 15-3: Receptor Traffic Flow Tables** [APP-250] for receptor L3 A151 Holbeach Road. In accordance with the proposed routing strategy, all construction traffic accessing and egressing these accesses would approach from, and depart towards, the east and west, resulting in the following movements:<br><br>• HR 01 would operate predominantly as a left-in / right-out movement; and,<br>• HR 02 would operate predominantly as a right-in / left-out movement.<br><br>The two accesses would not operate as a traditional crossroads junction, as there would be no demand for movements directly between the accesses across the A151. Rather, each access would independently serve the relevant section of the Grid Connection Route for which it is intended.<br><br>Furthermore, the combined level of traffic associated with HR 01 and HR 02 is relatively modest and temporary in |
| **LCC-049**<br>Highway concerns summary | Key concerns at this stage are: | |
| **LCC-050**<br>Highways authority comments | Accesses HR-01 and HR-02. As proposed, these two accesses form a crossroads with the A151. Further information on traffic turning flows at this junction is required, it is considered that a ghost island right turn lane will be necessary for these main site accesses. The applicant should clarify whether there be straight over movements, and whether a staggered arrangement been considered? When further information is provided and LCC (Highways Authority) can agree the junction form and type, a Stage 1 Road Safety Audit will be required at this planning stage. | |

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| | | nature, being limited to the construction phase of the Scheme.<br><br>The Applicant notes LCC's request for a Stage 1 Road Safety Audit and the Applicant is undertaking further engagement with LCC with regards to both, the timing and scope of any commissioned Road Safety Audit.<br><br>The Applicant further notes LCC's consideration of a ghost island right turn arrangement, may be required at Accesses HR-01 and HR-02. However, the Applicant has not proposed such an arrangement for the following reasons:<br><br>• The Grid Connection Route connecting the Solar Development Area to the National Grid Weston Marsh B Substation will experience a peak of construction in 2031, with construction traffic volumes during the years either side of this peak year anticipated to be materially lower.<br><br>• The works associated with the Grid Connection Route are temporary in nature and the construction traffic generated at the access points will only occur for a limited period over the course of the construction phase. Following the completion of works, the usage of access point along the Grid Connection Route will be limited to infrequent maintenance and inspection activities.<br><br>• The works required to construct a ghost island turning arrangement are only considered to be |

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| | | applicable for the construction phase of the Scheme and would be an over-engineered solution if retained permanently. It is considered that the disruption to local road users during the construction of such a temporary arrangement would be more significant than the disruption caused by the expected volume of construction traffic without a ghost island. It is expected that during the peak construction phrase period, there will be a maximum of 65 vehicles related to construction using the A151 during the AM and PM construction peak hours (06:00-07:00 and 19:00-20:00 respectively), of which 12 will be shuttles and none will be HGVs, roughly equivalent to one extra vehicle per minute. Outside of the peak construction hours, there will be a maximum of 5 vehicles per hour (all HGVs) on the A151, equivalent to one extra HGV every 12 minutes.<br><br>Notwithstanding the above, the Applicant remains committed to ongoing engagement with LCC regarding the detailed design and operation of these accesses. The Applicant will continue to review the access arrangements as the design develops and will consider the findings of any Road Safety Audit and any reasonable recommendations made by the Highway Authority.<br><br>The Applicant's objective is to ensure that the proposed access arrangements operate safely and efficiently throughout the construction phase and that any mitigation |

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| | | measures are appropriately targeted to the scale, duration and nature of the predicted traffic impacts. |
| **LCC-051**<br>A16-01 access | Access A16-01. This access is proposed on A16 near Cowbit. Further information on traffic turning flows at this junction is required. It will require a ghost island right turn lane and Stage 1 Road Safety Audit. | The Applicant notes Lincolnshire County Council's comments regarding Access A16-01 and the request for additional information relating to turning movements, the provision of a ghost island right-turn lane and the undertaking of a Stage 1 Road Safety Audit.<br><br>During the peak construction year of 2031, Access A16-01 is anticipated to experience a peak daily total of 400 two-way movements (arrivals and departures), as shown in the 24hr Dev column of the Total Vehicle Traffic Flows - Future Baseline vs. Development table in **ES Appendix 15-3: Receptor Traffic Flow Tables** [APP-250] for receptor L18 A16 Crowland Bypass (Near Crowland Airfield). This level of traffic should be viewed in the context of the temporary nature of the construction works associated with the Grid Connection Route (associated with the works within this specific area) and BESS infrastructure. As set out above in relation to Access HR-01 and HR-02, the Applicant notes LCC's request for a Stage 1 Road Safety Audit and the Applicant is undertaking further engagement with LCC with regards to both, the timing and scope of any commissioned Road Safety Audit.<br><br>Access A16-01 is required to facilitate access to the Grid Connection Route to the north and BESS infrastructure to |
| **LCC-052**<br>Highways authority comments | Both the above junctions will need to be delivered through full Section 278 Agreements with the Highways Authority. | |

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| | | the south. Once construction has been completed, vehicle movements associated with the operational phase are anticipated to be significantly lower, reflecting the limited nature of the maintenance and inspection works required.<br><br>To support the safe operation of the access during the construction phase, the Applicant has proposed that access from the north features an auxiliary lane to allow construction vehicles turning left into the access to pull off the mainline carriageway when slowing to undertake turning manoeuvres. This arrangement would minimise the risk of road users encountering slow turning vehicles when travelling southbound on the A16. With regard to the right turn ghost island proposed by LCC in its comments, the Applicant considers that the principles outlined in its response to accesses HR-01 an HR-02 also apply here. However, the Applicant acknowledges that the volume and speeds experienced on the A16 are higher than on the A151. The Applicant is therefore willing to work collaboratively with LCC to agree any additional mitigation considered necessary. The mitigation measures at this location could extend to consider a left in/left out controlled arrangement which would negate the need to implement a disruptive ghost island arrangement that would only be practically required for the construction phase. |

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| | | Works to construct accesses to the Scheme would be provided through the DCO pursuant to Article 15 and Schedule 7, rather than through the Section 278 process under the Highways Act 1980. Requirement 5 (Detailed Design Approval) requires that no part of the authorised development may commence until details of, amongst other matters, vehicular and pedestrian access, parking and circulation areas have been submitted to and approved by the relevant planning authority. |
| **LCC-053**<br>Passing places | Passing Places – The Outline CTMP (7.2.1) suggests that temporary passing places will be provided on Martins Road and Langarry Gate Road. Passing places will need to be to Council HA Specification which is for permanent works. The number and location of these passing spaces should be identified at this planning stage, with indicative location drawings to ensure that these mitigations can be delivered on site and are not constrained by ditches or l and ownership. Back Bank is also identified for HGV routing (Figure 15-3 [APP-161]) and will therefore require passing places as well. | The Applicant notes Lincolnshire County Council's comments regarding the provision of temporary passing places on Martins Road, Langary Gate Road and Back Bank. The Applicant would note that Holbeach Drove Gate similarly will be used for HGV routeing to facilitate the construction of the Inter-Array corridor.<br><br>The Applicant is currently developing a Temporary Passing Place Strategy document to support the construction traffic trips to and from the Site along the surrounding network, which is to be submitted during examination following further engagement with the Local Highway Authority. The strategy will look to identify the location and extent of any passing places required (temporary in nature). Through the development of this document, due regard will be given to any existing constraints such as highway geometry and boundaries, drainage/ditches, vegetation, utilities and third-party land interests. Moreover, the document will seek to |

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| | | take due accord of any adjacent constraints and will seek to minimise any vegetation loss whilst ensuring intervisibility of successive passing places and facilitate the safe movement of construction traffic. Once this has been developed the Applicant will share these details with Lincolnshire County Council for review prior to submission into the Examination.<br><br>It should be noted that the final design, specification and implementation arrangements for the Temporary Passing Place Strategy will be agreed with Lincolnshire County Council through the detailed design process and secured through the appropriate mechanisms. |
| **LCC-054**<br>Cumulative traffic effects | The Council will further raise concerns regarding the applicant's assessment of the cumulative effects associated with traffic and access in the LIR. At this stage further information is considered to be required to fully understand and assess the impact of the Meridian scheme cumulatively with other developments. Notably to justify the applicant's assertion that the cumulative effect with the other identified developments would be primarily attributed to the other schemes and the screening out of the National Grid Weston Marsh to East Leicestershire development. | The Applicant notes Lincolnshire County Council's comments regarding the cumulative assessment and the specific reference to the National Grid Weston March to East Leicestershire development. The Applicant will respond to the points raised in the LIR when received.<br><br>The Applicant would like to clarify that the Weston Marsh to East Leicestershire development was not screened out of the cumulative schemes assessment. The scheme is included as ID13 in Table 15-35: Screened in Cumulative Schemes in **ES Chapter 15: Traffic and Access** [APP-066].<br><br>Based on the Environmental Impact Assessment Scoping Report (November 2025), it was anticipated that any construction traffic associated with the Scheme would |

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| | | overlap with this project primarily across the key routes within the wider area, specifically on the A16 and A151, where the Scheme assessment identified the links to be negligible. On this basis, it was concluded that there would not be any potential likelihood of significant cumulative effects arising on these links as a result of the two schemes from a traffic and access point of view, as stated in paragraph 15.11.8 of **ES Chapter 15: Traffic and Access** [APP-066].<br><br>The Weston Marsh to East Leicestershire (WMEL) Stage 2 consultation material published in September 2026 (since the preparation of the **ES Chapter 15: Traffic and Access** [APP-066]) has confirmed the potential for cumulative interaction during construction; however, in the absence of detailed WMEL workforce, peak hour and traffic assignment information, a robust quantitative reassessment is not currently possible. Notwithstanding this, the information published to date does not indicate any material change to the conclusions of the Meridian ES cumulative assessment and therefore does not necessitate further reassessment at this stage.<br><br>Accordingly, the Applicant remains satisfied that the cumulative assessment presented within **ES Chapter 15: Traffic and Access** [APP-066] is robust and appropriate in assessing the potential impact of overlap between the two schemes and that there is no evidential basis to support the |

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| | | need for a reassessment of the cumulative effects associated with traffic and transport.<br><br>Section 15.11 of the **ES Chapter 15: Traffic and Access** [APP-066] shows that there will not be cumulative significant transport effects as a result of the Scheme and other schemes, with the exception of in terms of road safety on four receptors. This is discussed in 15.11.23 to 15.11.27. Tables 15-40 and 15-41 show the cumulative road safety effects on these receptors, with and without the Scheme traffic flows. As shown and discussed, the effects would be moderate without the Scheme, and the introduction of the Scheme would not change the conclusion. For each of the receptors, the magnitude of impact of the Scheme in isolation would be very low. Paragraph 15.11.24 sets out that it is reasonable to conclude that the effects on L3, L34 and L35 can primarily be attributed to the cumulative schemes.<br><br>Further discussion is provided in paragraph 15.11.25 with regards to the cumulative effect on L25, Hulls Drove East. This sets out that the effect is unlikely to occur as there is not likely to be overlap between peak construction periods and the impacts of the individual schemes are likely to be very low. Notwithstanding this, paragraph 15.11.27 sets out that there will likely be opportunities to minimise cumulative effects in the construction phase and through |

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| | | measures set out in the **OCEMP** [APP-275] and **OCTMP** [APP-278]. |
| **LCC-055**<br>Public Rights of Way | There are a number of PROW within or on the perimeter of the site that would be subject to temporary impacts during the construction phase of the development, however it is noted that none are proposed to be permanently diverted or closed. Enhancement to the PRoW network is proposed through the creation of a permissive path which is welcomed. Temporary management measures for PRoW are set out in the outline Public Rights of Way Management Plan (PRoW-MP) [APP- 281]. | The Applicant notes the comments that have been raised by LCC and the details on how Public Rights of Way are to be managed during construction, operation and decommissioning stages is reported in the **Outline Public Rights of Way (PRoW) Management Plan** [AS-026].<br>Any temporary diversions or management measures to be implemented should be read in conjunction with the **Streets, Rights of Way and Access Plans** [APP-014 and AS-009] |
| **LCC-056**<br>Public Rights of Way | The Council's Public Rights of Way Officers have undertaken an initial review of the proposals, including the draft DCO [APP-028] and the PRoWMP and raise a number of concerns at this stage which are summarised below and will be set out on more detail in the LIR. | The Applicant notes the comments made by LCC and has addressed those points in turn below. |
| **LCC-057**<br>Article 13 PRoW closure powers | There are concern regarding the extent of powers being sought in the draft DCO. Article 13 (1) as currently drafted appears to permit the closure of any PRoW for 'any reasonable time' which is considered to be vague and potentially excessive. | The Applicant considers the drafting of Article 13 to be appropriate and consistent with established precedent. In particular, the wording permitting temporary closures for "any reasonable time" is consistent with recently made DCOs, including the One Earth Solar Farm Order 2026, Peartree Hill Solar Farm Order 2026 and Tillbridge Solar Farm Order 2025. |

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| | | The Applicant also notes that Article 13(4) requires consultation with the street authority before exercising the power in relation to streets and public rights of way identified in Schedule 6 and, for other streets and public rights of way, requires the consent of the street authority. In addition, Requirement 17 secures a Public Rights of Way Management Plan, to be approved in consultation with the relevant highway authority. That Public Rights of Way Management Plan will provide further controls in respect of works which impact public rights of way, and appropriately constrains the broader power within Article 13.<br><br>The Applicant therefore does not consider that any amendment to Article 13 is required in response to these comments. |
| **LCC-058**<br>PRoW closure duration | Clarity is considered to be required on the duration of any closures. Currently there does not appear to be any defined duration. Closures must be time limited (a suggested maximum of 6 months), clearly defined and consistent with the approach under the Road Traffic Regulation Act 1984. | Table 3-1 of the **Outline PRoW Management Plan** [AS-026] provides the durations for temporary closures, where these may be required to facilitate the construction of the Scheme. Other than access to two PRoWs (Crow/12/1 and Wstn/3/1) which are proposed to be closed temporarily for 4-6 weeks (as indicated in Table 3-1 of the **Outline PRoW Management Plan** [AS-026]), access to all other existing PRoW will be maintained during the construction phase. No permanent diversions or closures are proposed. |

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| **LCC-059**<br>PRoW engagement and notification | Prior to any closure engagement/consultation with the Council's PRoW team should be undertaken and advance notification provided. | The Applicant notes the request made by LCC. Article 13 of the **Draft DCO** (Doc Ref. 3.1 Rev 2) requires the undertaker to either consult or obtain the consent of LCC prior to the temporary closure of PRoWs, dependent on the specific PRoW affected. |
| **LCC-060**<br>PRoW vehicle use | The proposed use of PRoW by construction or operational vehicles raises a number of concerns regarding the need for surfacing upgrades, on-going maintenance, legal status of this use, and displacement of public access | PRoW closures have been proposed to safely separate construction works activities from PRoW users during the installation of the overhead lines within the Inter-Array Corridor and Grid Connection Route. The closure extents defined in the **Streets, Rights of Way and Access Plans** [APP-014 and AS-009] offer a degree of flexibility to the Contractor to determine the appropriate crossing point of the PRoW, however it is anticipated that the interaction would be limited to designated crossing points which will limit disruption and to the PRoW. Use of PRoW associated with the Scheme would be authorised by the **Draft DCO** (Doc Ref. 3.1 Rev 2). Two temporary closures of PRoW are proposed for the duration of 4-6 weeks, however, the remaining PRoW would remain open, with any interfaces managed. The PRoW will be managed throughout the construction phase to ensure that existing routes can continue to be used safely throughout the duration of the proposed works. Details of these mitigation measures which include (but are not limited to) temporary PRoW diversion routes, the implementation of manned controls and the adoption of a communications strategy are |

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| | | provided in Section 3.2 of the **Outline Public Rights of Way Management Plan** [AS-026]. No whole-scale surfacing improvements or ongoing maintenance works to PRoW are required as part of the Scheme, as temporary authorisation for the use of motor vehicles over the PRoW is expected to be restricted to crossing points, where vehicles will need to cross the PRoW to access different parts of the Site, rather than along its length. |
| **LCC-061**<br>PRoW Management Plan | The Council will have some points of detail regarding the PRoW-MP to strengthen its content, purpose and enforceability. Further detailed comments will be provided in the LIR and the Council will seek to engage with the applicant regarding these matters | The Applicant notes the comment made by LCC and will await further comments from LCC's LIR. |
| Hydrology and Hydrogeology | | |
| **LCC-062**<br>Surface Water Flood Risk | The following documents contain the majority of information relating to surface water flood risk: ES Appendix 11-3: Flood Risk Assessment [APP-222] and 6.3 ES Appendix 11-4: Outline Drainage Strategy [APP-227]. Comments on surface water flood risk are provided by the Council in its capacity as Lead Local Flood Authority (LLFA). The assessment of surface water flood risk and the approach to the drainage strategy for dealing with surface water flood risk and associated proposed measures are agreed as appropriate and suitable. Larger impermeable areas | The Applicant welcomes LCC's agreement on the proposed drainage strategy. |

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| | will be created by the formation of the 400kV Substation, the BESS Compound, the three 132kV Substations and the solar stations – these will need SUDs drainage as proposed and the detail design will need to be conditioned and approved, ensuring that greenfield runoff is not exceeded. | |
| **LCC-063**<br>IDB approvals | Approvals from Internal Drainage Boards (IDBs) will be needed for all watercourse crossings. | The Applicant notes the Council's comments regarding approvals from the relevant Internal Drainage Boards. 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 Rev 2), and is engaging with South Holland IDB and North Level IDB on the drafting of those provisions to ensure that the Boards' statutory functions, assets and land drainage interests are appropriately protected. Ongoing engagement with the relevant IDBs will continue to ensure that matters relating to discharges, works to watercourses, works in proximity to main drains and flow diversions are appropriately managed through the DCO regime. |
| **LCC-064**<br>Sequential and Exception Tests | In relation to our earlier comments on site selection, we will also make further comments in our LIR in relation to the application of the sequential and exception tests. | The Applicant will review and respond to comments raised in the LIR once received. |
| Landscape and Visual | | |

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| **LCC-065**<br>Landscape Effects | The development has the potential to transform the local landscape by altering the character on a large scale. This landscape change also has potential to affect wider landscape character, at a regional or county scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity and agricultural character, that are defining characteristics of the area. The Council are concerned about the landscape character effects through changes to the land use over an extensive area of agricultural land, as identified in Section 12.8 of the LVIA chapter. The LVIA chapter identifies a "partial degradation of the key characteristics of (these) HLCAs/ HLCZs through the temporary loss of arable land and erection of features within the skyline, changing partially the key characteristic of 'openness', as a result of the erection of taller infrastructure in particular." Specifically, the landscape associated with the Grid Connection Route and the Inter-Array Connections (overhead line elements) are identified as having a high susceptibility to the development. | The Applicant acknowledges the Council's concerns regarding landscape character effects. The effects referred to in the Council's representation are identified and assessed within **ES Chapter 12: Landscape and Visual [APP-063]**and have informed the iterative design of the Scheme and the mitigation measures proposed. Whilst the LVIA identifies landscape character effects, including effects associated with the overhead line infrastructure, the Applicant considers that these effects have been appropriately assessed and should be considered within the wider context of the benefits of the Scheme, as set out within the assessment of planning balance described within Section 6 of the **Planning Statement** [APP-260]. |
| **LCC-066**<br>Landscape Effects | Significant landscape effects are subsequently identified in the LVIA chapter with the identification of Significant adverse effects to The Fens (HLCA9), The Wash (HLCA 10), and at a local level to FEN 2 – | The Applicant notes LCC's response and has no further comments to make with regards to the summary of effects. The Applicant considers that LCC has accurately summarised Applicant's assessment. |

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| | the Eastern Fens and WSH6 - Townlands at Construction, Year 1 (winter) Operational and Year 15 (summer) Operational. Moderate adverse (significant) landscape effects largely arise from the character areas directly affected (where the development is located within these areas). Appendix 12-4 Landscape Assessment (Table 1) provides a detailed explanation of these assessment values. | |
| **LCC-067**<br>Landscape Effects | In summary, the LVIA is transparent regarding significant effects on Landscape Character likely to be caused by the proposal with effects on landscape character assessed as significant for several landscape receptors. | The Applicant notes LCC's response and has no further comments to make with regards to the summary of effects. The Applicant considers that LCC has accurately summarised Applicant's assessment. |
| **LCC-068**<br>Visual Effects | The scale and extent of development would also lead to Significant Adverse effects on views from visual receptors, changing them from views experienced within an agricultural or rural landscape to that of a landscape containing large scale solar development and OHL infrastructure. | The Applicant notes LCC's response and has no further comments to make with regards to the summary of effects. The Applicant considers that LCC has accurately summarised Applicant's assessment. |
| **LCC-069**<br>Visual Effects | The development has been identified in the LVIA as resulting in a Significant change to a variety of visual receptors including VP 2, 3, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 20, 21, 27, 30 and LCC 2-1, 3, 8, 9, 10 at Construction, Year 1 (winter) Operational and Year 15 (summer) Operational. Significant adverse visual | The Applicant notes LCC's response and has no further comments to make with regards to the summary of effects. The Applicant considers that LCC has accurately summarised Applicant's assessment. |

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| | effects largely arise from sensitive users in close proximity to the development where it is not possible to sufficiently screen views of large infrastructure such as pylons or extensive solar arrays. | |
| **LCC-070**<br>Visual Effects | Most receptors are evaluated to receive Moderate adverse (significant) effects from the development. Only VP3 PROW CROW 7/1, VP9 Martins Road / Hardy's Lane junction, and VP14 Langary Gate Road are judged to experience Major adverse (significant effects). Appendix 12-6 Visual Assessment (Table 1-1) provides a detailed explanation of these assessment values. | The Applicant notes LCC's response and has no further comments to make with regards to the summary of effects. The Applicant considers that LCC has accurately summarised Applicant's assessment. |
| **LCC-071**<br>Visual Effects | In summary, the LVIA is transparent regarding significant effects on the Visual environment likely to be caused by the proposal with effects on many receptors evaluated as significant. | The Applicant notes LCC's response and has no further comments to make with regards to the summary of effects. The Applicant considers that LCC has accurately summarised Applicant's assessment. |
| **LCC-072**<br>Mitigation & Enhancement Measures | Mitigation is described in Section 12.7 and includes outline CEMP and LEMP proposals, a description of the design principals that have been applied, and embedded measures, including careful site selection and offsets adjacent to dwellings. Existing vegetation patterns have been conserved and new green infrastructure corridors created. Section 7.3 Design Approach Document provides more detailed information. | The Applicant notes LCC's response and has no further comments to make with regards to the summary of mitigation. The Applicant considers that LCC has accurately summarised Applicant's assessment. |

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| **LCC-073**<br>Mitigation & Enhancement Measures | The LVIA is transparent about the effectiveness of the proposed mitigation to reduce significant effects on the landscape or visual setting. It is noted that significant landscape and visual effects, caused by the change in land use and the massing of the proposed infrastructure, are judged in the LVIA to change little upon the successful establishment of the proposed planting scheme (Operational - Y15 summer). It is also stated (p59) that 'based on the open fen and character of the landscape and limited existing vegetation, it is not anticipated that winter views would materially alter the conclusions of the LVIA'. | The Applicant notes LCC's response and has no further comments to make with regards to the summary of effects and mitigation. The Applicant considers that LCC has accurately summarised Applicant's assessment. |
| **LCC-074**<br>Mitigation & Enhancement Measures | The LVIA acknowledges that mitigation planting and habitat creation will establish beneficial landscape and visual assets across the area, however, 'it will not be possible to fully mitigate the significant landscape and visual effects due to the requirements of the Scheme. As such no additional mitigation is proposed because the scale and functional requirements of the infrastructure preclude further screening or landform modification without compromising safety and operational integrity' (paragraph 12.9.2). | The Applicant notes LCC's response and has no further comments to make with regards to the summary of effects and mitigation. The Applicant considers that LCC has accurately summarised Applicant's assessment. |
| **LCC-075**<br>Mitigation & | In summary, there is no pretence within the LVIA that mitigation planting can limit the development's effects on landscape character or the visual setting. Preference has been given to good design and | The Applicant notes LCC's response and has no further comments to make with regards to the summary of effects |

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| Enhancement Measures | embedded measures which are described in Section 12.7 of the LVIA and include careful site selection and offsets to reduce harm to sensitive receptors (residents) where possible. | and mitigation. The Applicant considers that LCC has accurately summarised Applicant's assessment. |
| **LCC-076** Residential Visual Amenity Assessment (RVAA) | A description of the approach to RVAA is provided in Sections 12.4 and 12.8.45. This highlights the set-back approach that has been adopted by the scheme to reduce impacts on residents and settlements. The conclusion of the LVIA is that 'whilst significant effects will arise beyond Operation Year 15 for representative views that reflect the outlook for residential receptors, these would not result in major adverse effects during any phase of development and reach a threshold where residential visual amenity would be a consideration'.<br><br>In summary, the LVIA concludes that an RVAA is not required for this project. However, looking at the number of VPs assessed as having significant effects, the Council would request further explanation to clarify this conclusion. | A description of the approach to RVAA is provided in **ES Chapter 12: Landscape and Visual** [APP-063], paragraphs 12.4.41 – 12.4.50 and 12.8.45 – 12.8.53.<br><br>It is important to distinguish between significant visual effects, which are routinely assessed through a LVIA, and the circumstances that justify a RVAA. The former does not automatically imply the latter, and the Landscape Institute's 'Technical Guidance Note 2/19: Residential Visual Amenity Assessment' (TGN 2/19)[13] expressly recognises this distinction. It states that "*LVIA findings of significant (adverse) effects on outlook and /or on visual amenity at a residential property do not automatically imply the need for a RVAA*". TGN 2/19 notes that there is a misconception that a significant effect identified in the LVIA adjacent to a property will also potentially lead to reaching the Residential Visual Amenity Threshold. |

[13] Landscape Institute (2019) Technical Guidance Note 2/19: Residential Visual Amenity Assessment (RVAA). London: Landscape Institute. Available at: https://landscapeinstitute.org/technical-resource/rvaa/. Accessed: 31 July 2026.

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| | | TGN 2-19 suggests that a RVAA may be recommended in circumstances where, for example, a development would be "'blocking the only available view from a property', or 'overwhelming views in all directions'; and 'unpleasantly encroaching' or being 'inescapably dominant from the property'".<br><br>The LVIA contained in **ES Chapter 12: Landscape and Visual** [APP-063], paragraphs 12.8.45 – 12.8.53 and its associated figures and appendices has listed properties adjacent or close to Parcels A – D and within 500m of the Grid Connection Route. It describes where offsets have been applied to move solar arrays away from residential properties. It further lists criteria considered when judging visual effects for viewpoints related to residential receptors and contain views of elements of the Scheme. TGN 2-19 specifically notes that, for overhead transmission lines, only "properties within 100 – 150 metres of the finalised route" are potentially candidates for an RVAA.<br><br>The Scheme was iteratively designed to avoid overbearing and intrusive design, in particular for residential receptors, through off-set distances from residences adjacent to the Solar Development Area, refinement of solar development parcels and pylon locations, and the incorporation of landscape mitigation. Proposed landscape mitigation is to soften the boundaries of the Solar Development Area, |

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| | | particularly in locations where views from residential properties may occur.<br><br>Consequently, no residential property was identified where impact of the Scheme had the potential to reach the Residential Visual Amenity Threshold. The Scheme would not block the only available view, overwhelm views in all directions, or become an inescapably dominant feature of residents' views. Existing semi-mature or mature garden and / or boundary vegetation, property orientation, separation distances and, where relevant, the presence of existing overhead transmission infrastructure, all moderate the extent of visual influence.<br><br>The decision not to prepare a standalone RVAA was therefore a reasoned professional judgement, based on the guidance, the design evolution of the Scheme, and the findings of the LVIA. Furthermore, a separate RVAA would not have provided materially different evidence to that already presented. The representative residential viewpoints, visualisations and detailed assessment of residential visual effects enable the decision-maker to determine whether the Scheme would result in an overwhelming visual effect on residential visual amenity. The information submitted on visual effects is therefore considered proportionate, robust and sufficient to inform |

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| | | the planning decision, consistent with the principles of GLVIA3[14], TGN 2/19[15] and the EIA Regulations[16]. |
| **LCC-077**<br>Decommissioning | In Section 12.8.38 of the LVIA, it is clarified that the design life of the project is 40 years and the project will be dismantled over a 24-month period. All above ground infrastructure will be removed, in addition, concrete foundations will be removed to a depth agreed with the land owner. | The Applicant notes LCC's response and has no further comments to make. |
| **LCC-078**<br>Cumulative effects | An analysis of the cumulative effects is provided in Section 12.11 of the LVIA. This analysis considers both combined impacts and sequential impacts, explains what types of developments have been considered (solar farms, BESS, OHL and electricity transmission infrastructure). For both landscape character and visual effects, at both construction and operation, it is assessed that 'the addition of the Scheme in combination with other individual cumulative schemes does not result in a notable or transformative degree of change'. However, the | The Applicant notes LCC's response and has no further comments to make with regards to the summary of cumulative effects. The Applicant considers that LCC has accurately summarised Applicant's assessment. |

[14] Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment. Available at: https://landscapeinstitute.org/policy-practice/technical/assessments-standards/glvia3-panel/. Accessed: 31 July 2026.
[15] Landscape Institute (2019) Technical Guidance Note 2/19: Residential Visual Amenity Assessment (RVAA). London: Landscape Institute. Available at: https://landscapeinstitute.org/technical-resource/rvaa/. Accessed: 31 July 2026.
[16] UK Government (2017) The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/571). London: The Stationery Office. Available at: https://www.legislation.gov.uk/uksi/2017/571/contents. Accessed: 31 July 2026.

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| | 'totality' of effects, 'considering the Scheme and all cumulative projects within HLCA10: The Wash, HLCZ WSH6: The Townlands and WSH 4: Reclaimed Wash Farmlands' was considered to constitute a moderate adverse (significant) effect. | |
| **LCC-079**<br>Cumulative effects | Appendix 12-7 Landscape and Visual Cumulative Assessment (Table 1-2) provides a detailed explanation of the assessment values.<br><br>No further mitigation is proposed to address these cumulative effects. | The Applicant notes LCC's response and has no further comments to make with regards to the summary of cumulative effects. The Applicant considers that LCC has accurately summarised Applicant's assessment. |
| **LCC-080**<br>7.16 Outline LEMP | The applicant commits to a 5-year establishment period with long term management including only the replacement of planting proving a screening function. The Council would request an establishment period of 15 years to align with the assessed residual landscape and visual effects. This will ensure that the proposed planting scheme meets the aims and objectives laid out in the submission. | The **OLEMP** (Doc Ref. 7.16 Rev 1) includes criteria for a 5-Year Establishment Period which is to be followed by a Long Term Maintenance Period for each proposed landscape type for the lifespan of the Scheme. Landscape Types include the following:<br><br>• Bands of shrubs and scattered trees<br>• Bands of shrubs<br>• Grassland<br>• Watercourse Habitat Enhancement Buffer<br>• Aquatic Habitats and Waterbodies<br><br>The Applicant considers that the proposed management regime appropriately distinguishes between the establishment and long-term management phases of the landscape mitigation. The five-year establishment period is |

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| | | intended to secure the successful establishment of new planting through intensive maintenance measures, including weed control, watering, inspection, adjustment of guards (where relevant) and replacement of failures, where necessary.<br><br>Following successful establishment, the management regime transitions to long-term management, reflecting that the planting should no longer require the same level of intensive intervention. However, this does not represent the end of maintenance responsibilities. The **OLEMP** (Doc Ref. 7.16 Rev 1) includes ongoing monitoring of the health and condition of the planting and, importantly, requires the replacement of failed or defective plants during the next planting season where those plants provide a landscape screening function, which applies to the proposed bands of shrubs and scattered trees.<br><br>This commitment was included in relation to the Long Term Management for 'bands of shrubs and scattered trees' as part of the statutory consultation process with Lincolnshire County Council, which is, for this particular matter, detailed in **ES Chapter 12: Landscape and Visual** [APP-063], Table 12-2. In addition to this commitment, the following commitments have been proposed and are listed in paragraph 5.4.7 of the **OLEMP** (Doc Ref. 7.16 Rev 1):<br><br>• Cutting will be carried out at the end of the winter in February, aiming to retain berries through the |

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| | | winter months for wildlife and avoiding the bird breeding season;<br>• Overgrowing or overhanging branches will be removed from any pathways, private tracks, or adjacent public roads to keep them unobstructed;<br>• Dead, over-mature or dying hedgerow trees will be subject to removal where they are considered dangerous on health and safety grounds, and in accordance with any protected species constraints; and<br>• Monitoring will be undertaken to detect any significant changes in hedgerow health and condition. Checks will be made every three years, using fixed-point photography.<br>In light of these commitments, which are similar for the remaining landscape types, the Applicant considers that retaining a five-year establishment period followed by enhanced long-term management provides a more tailored approach for each landscape type and a proportionate and robust method that will ensure the landscape mitigation fulfils its intended function by Year 15 and over the lifetime of the Scheme. |
| **LCC-081**<br>Conclusion | Overall, the LVIA presented is robust with good methodology, clear explanations of assessment values and reasonable conclusions. The LVIA is transparent about the significant effects of the development on | The Applicant welcomes the Council's acknowledgement that the LVIA is robust and transparent, and the Scheme has been designed with sensitivity. |

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| | landscape character and the visual setting and acknowledges the limitations of mitigation to reduce these effects due to the nature of the existing open landscape. The project has been designed with sensitivity to reduce effects on receptors, with set-backs and mitigation planting used sparingly to remain in keeping with the existing landscape. | The Outline Landscape Masterplan included within the Annex A of the **OLEMP** (Doc Ref. 7.16 Rev 1) shows the areas of the Solar Development Area and CSECs within the Grid Connection Route only. This is because the proposed landscaping is exclusive to this area. There is no proposed landscaping within the remaining of the Grid Connection Route for the reasons explained within **ES Chapter 12: Landscape and Visual** [APP-063]. |
| **LCC-082**<br>Conclusion | Going forward, the Council welcomes the landscape and visual assessment as submitted but will assess the significant receptors identified in the LVIA in more detail and establish if there are any omissions. | |
| **LCC-083**<br>Conclusion | At this stage, there does not seem to be a complete Landscape Masterplan of the whole project within the application documents. Parts are shown in the 7.16 Outline Landscape and Ecology Management Plan, but an overview of the whole scheme's landscape design and mitigation proposals does not seem to be provided. | |
| **Ecology and Biodiversity** | | |
| **LCC-084**<br>Impacts on statutory and non-statutory designated sites | The Applicant has undertaken desk studies and a search of information held by Lincolnshire Ecological Records Centre to identify important ecological sites in the vicinity of the proposal.<br><br>There are 7 internationally important sites designated for biodiversity within 15km of the proposal. The | The Applicant notes this comment. |

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| | locations of these sites are set out in APP-098. Given the potential for impacts on statutorily designated sites, a Habitats Regulation Assessment Report [APP-217] has been prepared which assesses potential pathways for Likely Significant Effects on internationally important sites. The Secretary of State will need to undertake a Habitats Regulations Assessment (HRA) and be satisfied that sufficient information has been submitted by the Applicant to enable this to be completed. | |
| **LCC-085**<br>Impacts on statutory and non-statutory designated sites | The applicant has worked with Natural England via the Discretionary Advice Service and potential impacts, such as habitat loss (both temporary and permanent), noise, pollution and disturbance appear to have been assessed appropriately. Where impacts were considered to potentially have a Likely Significant Effect (LSE) on the site(s) interest features appropriate, further evidence is provided and where necessary mitigation measures have been identified to ensure that they do not constitute an Adverse Effect on Integrity (AEOI). The Council has no reason to disagree with the conclusions of the Habitats Regulations Assessment Report [APP-217] but considers that the proposed mitigation measures will need to be secured in the DCO | The Applicant notes the Council's comments. The conclusions of **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref. 6.3 Rev 1) are reflected in the environmental management and mitigation measures secured through the **Draft DCO** (Doc Ref. 3.1 Rev 2), including Requirements 7 (Landscape and Ecology Management Plan), 12 (Construction Environmental Management Plan), 13 (Operational Environmental Management Plan) and 21 (Decommissioning and Restoration). Requirement 5 requires the authorised development to accord with the approved Design Parameters document, which includes relevant design commitments and mitigation measures, including those relating to bird diverters. The **Environmental Mitigation and Commitments Register** (Doc Ref. 7.7 Rev 1) also identifies the relevant mitigation measures and the |

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| | | mechanism by which they are secured. The Applicant therefore considers that the proposed mitigation measures are appropriately secured through the **Draft DCO** (Doc Ref. 3.1 Rev 2). |
| **LCC-086**<br>Impacts on statutory and non-statutory designated sites | Whilst there are no nationally important sites designated for biodiversity within 2km of the draft Order limits, the draft Order limits do fall within the Impact Risk Zones of 5 Sites of Special Scientific Interest. There are also 23 non-statutory sites designated for biodiversity importance either within or within 2km of the draft Order limits. The locations of these statutory and non-statutory sites are set out in APP-098. Where necessary avoidance, and mitigation measures are proposed. The Council will expect appropriate mitigation measures to be secured in the DCO. | The Applicant notes the Council's comments and considers that the **Draft DCO** (Doc Ref. 3.1 Rev 2) secures the biodiversity mitigation identified through the Environmental Statement. Requirements 7 (Landscape and Ecology Management Plan), 8 (Biodiversity Net Gain Strategy), 12 (Construction Environmental Management Plan) and 13 (Operational Environmental Management Plan) require the approval and implementation of detailed mitigation measures substantially in accordance with the certified outline documents. The Applicant therefore considers that appropriate biodiversity mitigation measures are adequately secured through the **Draft DCO** (Doc Ref. 3.1 Rev 2). |
| **LCC-087**<br>Cumulative Effects | There are a number of development proposals of varying scales in the vicinity of this proposal. These range from small scale housing developments to NSIP scale energy developments. A list of projects included in Table 9-16 of APP-060. The Applicant's assessment of the cumulative impacts of these proposals on sensitive ecological receptors in the area concludes that with embedded and proposed mitigation | The Applicant notes this comment. |

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| | measures there will be no significant adverse effects on ecology arising from cumulative impacts. | |
| **LCC-088**<br>Biodiversity Net Gain (BNG) | Given the scale and nature of the proposed development The Council will expect the project to deliver significantly more than 10% BNG.<br><br>The Applicant has set out their approach to BNG in APP-274. This document assesses the likely ability of the Scheme to deliver BNG and states that the document will be updated when the design of the scheme is finalised. However, based on current plans, the Scheme is predicted to result in a net gain of 14.6% for area-based habitat units, 477.94% for hedgerow units and 11.42% for watercourse units.<br><br>The Council welcomes the Applicant's commitment to delivering BNG and considers that these commitments will need to be secured in the DCO. The Applicant will also need to demonstrate that the commitments made to delivering BNG are achievable. | The delivery of biodiversity net gain is secured through Requirement 8 of the **Draft DCO** (Doc Ref. 3.1 Rev 2), which requires the submission, approval, implementation and maintenance of a Biodiversity Net Gain Strategy and secures a minimum of 10% biodiversity net gain for habitat units, a minimum of 400% biodiversity net gain for hedgerow units and a minimum of 10% biodiversity net gain for watercourse units. Requirement 7 further secures the implementation and maintenance of the Landscape and Ecology Management Plan.<br><br>The **BNG Report** (Doc Ref. 7.9 Rev 1) demonstrates that the BNG commitments (i.e. a minimum of 10% biodiversity net gain for habitat units, a minimum of 400% biodiversity net gain for hedgerow units and a minimum of 10% biodiversity net gain for watercourse units) are achievable. |
| **LCC-089**<br>Biodiversity Net Gain (BNG) | The Council encourages the Applicant to work with other developers and stakeholders in the area to identify opportunities to deliver BNG strategically including by keeping up to date with emerging local strategies such as the Greater Lincolnshire Local Nature Recovery Strategy (LNRS). Public consultation on a draft version of the Greater Lincolnshire LNRS | Opportunities for collaborative strategic BNG delivery will be reviewed in line with the Greater Lincolnshire LNRS, which was released in July 2026 and which, has been reviewed to support this response. Habitats proposed within the landscape design are in keeping with 'Key Habitats' stated within the LNRS e.g., meadows and grassland, species rich grassland. Whereas other habitats within the LNRS |

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| | took place between 26th January and 8th March 2026 and publication of the final LNRS is expected during the summer of 2026.<br><br>Further detailed comments on ecology and biodiversity will be provided in the LIR. | would not be appropriate within the arable setting e.g., heathland, lowland fen and raised bog.<br><br>The landscape design supports Priority Statement (LE04), '*More and better managed LWS to enhance and support the resilience of the ecological network, increase biodiversity and maximise wider environmental benefits. SPECIES: Multiple assemblages relevant to location and habitat type*'. Support is captured through ensuring buffers are incorporated along with, the use of appropriate semi-natural habitat creation to build resilience. |
| Soils, Agriculture and Food Production | | |
| **LCC-090**<br>ALC grade results | The application states that the detailed survey undertaken for EIA identifies the following ALC grades: 120.6 ha of Grade 1 (11.3%); 92.6 ha of Grade 2 (8.7%); 205.4 ha of Subgrade 3a (19.2%) and 523.7 ha of Subgrade 3b (49.1%). However, these results are significantly different from any previously published assessments of the quality of the land of the proposed development area, a difference which is not commented on or justified in the EIA. | Applicant's responses to the detailed comments raised on the ALC survey are provided in rows below. The Applicant has also met with Natural England and LCC on 14 August 2026 to discuss and seek common ground on the ALC survey results. The Applicant's and stakeholders' position on the ALC survey is tracked through the **Statement of Common Ground with Natural England** (Doc Ref. 8.13) and **Statement of Common Ground with LCC** (Doc Ref. 8.11). |
| **LCC-091**<br>Boston and Spalding soil mapping | Why is there no reference to the 1:50,000 Soil Map of the Boston and Spalding District that maps the soils at five times the scale of the 1:250,000 National Soil Map? The accompanying Memoir states that these | The Boston and Spalding District Soil Map is not specifically referenced within **ES Appendix 5-2: Agricultural Land Classification Report – Parcels A and D** (Doc Ref. 6.3 Rev 1) and **ES Appendix 5-3: Agricultural Land Classification** |

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| | marine clays (Wallasea and Newchurch series) are porous and moderately permeable, but that cultivation pans are common in the upper subsoil. However, these are temporary features and do not affect the ALC, as is confirmed in the ALC guidelines. Since the slowly permeable layer is reported by Meridian as starting at 35 cm depth, it is reasonable to assume, in the lack of other real evidence, that what is being described is a cultivation pan in the upper subsoil. | **Report - Parcels B and C** (Doc Ref. 6.3 Rev 1) (hereafter referred to as 'the ALC Survey Reports'). The assessment utilised the nationally recognised soil mapping datasets alongside published geological information from the British Geological Survey (BGS), which were considered appropriate and proportionate. Reference to the Boston and Spalding District Soil Map would not materially alter the assessment conclusions. The soils encountered during the survey were consistent with the mapped Wallasea 2 Association and with the published superficial geological deposits. Furthermore, the Wallasea 2 Association is associated with soils exhibiting Wetness Class III to IV characteristics, which is consistent with the wetness assessment undertaken.<br><br>The suggestion that the slowly permeable horizon identified during the survey represents a cultivation pan is not supported by the field evidence. Whilst cultivation pans may occur within this soil association, their relevance to ALC grading is dependent upon them being restricted to the cultivated horizon and representing a temporary structural limitation that can be alleviated through normal agricultural operations. In contrast, the slowly permeable clay horizon identified during the survey was observed from approximately 35 cm below ground level and extended to the maximum depth investigated (120 cm bgl). The horizon therefore forms an inherent and persistent |

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| | | component of the soil profile rather than a shallow cultivation-induced feature.<br><br>Accordingly, it would not be appropriate to classify the identified slowly permeable layer as a temporary cultivation pan for the purposes of ALC assessment. Cultivation pans are typically relatively thin, discrete layers, whereas the observed horizon extended throughout the lower soil profile. The wetness limitation was assessed on the basis of the observed soil profile characteristics and in accordance with the methodology set out in the MAFF ALC Guidelines[17]. The conclusions presented therefore remain unchanged. |
| **LCC-092**<br>Soil pit evidence | Why are there no detailed pit descriptions to provide evidence that 673 ha of clay soils are uniformly slowly permeable, even though the ALC guidelines state that soils developed in marine often do not have slowly permeable horizons? In 5.1.2 of both Appendices "generalised profiles of the soil types encountered" are presented, and "the general profile is reflective of the | The survey methodology, including the excavation and assessment of soil inspection pits, was undertaken in accordance with the MAFF Guidelines and Field Survey Handbook[18]. Soil pits characterise each identified soil type and verify the soil profile characteristics recorded during auger observations. The number and distribution of inspection pits were considered sufficient to characterise |

[17] Ministry of Agriculture, Fisheries and Food (1988) Agricultural Land Classification of England and Wales: Revised Guidelines and Criteria for Grading the Quality of Agricultural Land. London: MAFF. Available at: https://webarchive.nationalarchives.gov.uk/ukgwa/20130402151656/http://archive.defra.gov.uk/foodfarm/landmanage/land-use/documents/alc-guidelines-1988.pdf. Accessed: 31 July 2026.

[18] Ministry of Agriculture, Fisheries and Food (1988) *Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land*. Available at: https://publications.naturalengland.org.uk/publication/6257050620264448

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| | findings in the soil pit associated with the Soil Type identified on site". Based on photos in the appendices it appears only two pits were dug in each soil type, but no detailed descriptions are provided. For a survey of this size, where the literature states slowly permeable horizons are unlikely to exist, one would expect many soil pits to have been dug and described in detail to confirm their existence and continuity across the landscape. Undisturbed samples could also have been usefully sent to a laboratory for measurements of density and porosity. | the identified soil type in accordance with the MAFF Guidelines and Field Survey Handbook.<br><br>The ALC Survey Reports presented generalised soil profiles for each soil type to avoid unnecessary repetition where profile characteristics were found to be consistent across the survey area. However, in response to this comment, the full soil pit logs and descriptions have now been provided within **ES Appendices 5-2 to 5-3** (Doc Ref. 6.3 Rev 1). These demonstrate the basis upon which the soil types were identified and confirm the presence of the soil characteristics described within the assessment.<br><br>It is acknowledged that soils developed in marine environments often do not have slowly permeable layers, however, the presence (or otherwise) of a slowly permeable layer cannot be determined solely from the origin of the parent material and must be established through field observation. During the site works and the progression of soil inspection pits and auger borings, slowly permeable clay horizons were identified within the soil profiles examined and therefore the assessment was based on observed site-specific conditions rather than assumptions regarding the behaviour of marine-derived soils.<br><br>The Council also suggests that laboratory testing of undisturbed samples for density and porosity should have been undertaken. Whilst such investigations may provide supplementary information, they are not a requirement of |

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| | | the MAFF Agricultural Land Classification Guidelines or Field Survey Handbook[19] and are not routinely required to identify slowly permeable horizons within an ALC assessment. The assessment was therefore undertaken using the standard field-based methodology prescribed by the guidance.<br><br>Accordingly, the conclusions presented within ES **Appendix 5-2** (Doc Ref. 6.3 Rev 1) and **ES Appendix 5**-3 (Doc Ref. 6.3 Rev 1) are based upon field observations collected in accordance with established ALC survey procedures and are supported by the inspection pit and auger data. |
| **LCC-093**<br>Auger bore evidence | In the absence of more than two soil pits, how can such reliance be placed on auger bores for the recognition of slowly permeable horizons? The main indicators described in the report are the presence of less than 0.50% biopores greater than 0.50mm diameter and prismatic structures. Even a highly experienced soil surveyor would struggle to identify structure and porosity with accuracy with an auger, without frequent pits. | The assessment in **ES Appendix 5-2** (Doc Ref. 6.3 Rev 1) and **ES Appendix 5-3** (Doc Ref. 6.3 Rev 1) did not rely solely on auger observations for the identification of slowly permeable horizons. The survey was undertaken in accordance with the MAFF Agricultural Land Classification Guidelines and Field Survey Handbook[20] which utilise a combination of auger borings and representative soil inspection pits. Within this methodology, auger borings provide the primary means of assessing the spatial |

[19] Ministry of Agriculture, Fisheries and Food (1988) *Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land*. Available at: https://publications.naturalengland.org.uk/publication/6257050620264448
[20]Ministry of Agriculture, Fisheries and Food (1988) *Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land*. Available at: https://publications.naturalengland.org.uk/publication/6257050620264448

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| | | distribution and variability of soils across a site, whilst inspection pits are used to verify and characterise representative soil profiles in greater detail.<br><br>Whilst inspection pits provide the most detailed assessment of soil structure and porosity, the MAFF methodology does not require excavation of pits at every observation point. Rather, representative pits are used to calibrate and verify the wider auger survey. This approach is standard practice within ALC surveys and reflects the methodology set out in the published guidance. |
| **LCC-094**<br>Auger bore evidence | Why are so many auger bores within each soil type identical in terms of horizon depths and content? The auger logs appear to have been copied and pasted and are not individually described, as if the surveyor in the field merely noted it was the same as the previous one. This is despite comment at 3.5.2 admitting "a degree of variability in physical characteristics within a discrete area is to be expected". This does not give confidence in the ALC grade ascribed to each bore, particularly the clay soils in Subgrade 3b, which depend on identification of a slowly permeable horizon. | All auger borehole logs were recorded in accordance with the Field Survey Handbook using a standardised descriptive framework to ensure consistency in the recording of soil characteristics across the survey area. The occurrence of identical or near-identical horizon depths at adjacent observations is not unusual where soils have developed with horizon boundaries recorded during ALC surveys typically assigned to the nearest integer depth within a homogenous soil unit.<br><br>The similarity between certain auger logs reflects the homogeneity of soil forming materials across the Site, particularly within the identified clay-dominated soil units, which laboratory analysis confirms to be texturally consistent. The use of standardised terminology for horizon descriptions, colours, textures, and structure can result in |

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| | | repeated descriptors where no meaningful variation is observed between adjacent locations. This does not indicate duplication of records, but rather consistency in field observations.<br><br>Where variation does occur within soil types, this is captured within the dataset, particularly in relation to topsoil depth (ranging from approximately 20 cm to 50 cm) and variability in subsoil horizon development (including both single and multiple horizon expressions extending to between 60 cm and 90 cm depth). These differences are significant in the context of Agricultural Land Classification, particularly in relation to the depth to slowly permeable layers and resultant wetness class assessment.<br><br>In addition, variation in diagnostic features such as mottling (including presence or absence of ochreous and grey mottles) further demonstrates that auger observations were independently assessed at each location rather than transcribed from previous logs.<br><br>The dataset as a whole demonstrates sufficient variation in key diagnostic parameters to support the soil type delineation and associated ALC grading, particularly in relation to identification of slowly permeable horizons. |

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| **LCC-095**<br>Calcium carbonate testing | Why was the calcium carbonate content of the soils not tested in the field with 10% HCL, as required in the ALC guidelines? Both the National Map Bulletin and the Boston and Spalding Memoir describe the Wallasea as deep stoneless clayey soils, calcareous in places. The calcareous clay soils are the Newchurch series with is mapped around Waplode, but is everywhere a common associate of the Wallasea series. The significance is that a calcareous clay soil in Wetness Class III with < 126 field capacity days is in 3a, not 3b. Lack of testing for calcium carbonate invalidates Meridian's 3b blanket grading of the clay soils. | Testing for calcium carbonate using 10% hydrochloric acid was undertaken in accordance with the ALC guidance[21].<br><br>The results of the testing demonstrated that calcareous conditions were not uniformly present across the clay soils. Positive reactions were recorded only in limited and spatially discontinuous locations, with the majority of observations indicating non-calcareous conditions below approximately 25 cm depth. This is consistent with the published soil information, which describes the Wallasea soils as being "calcareous in places" rather than uniformly calcareous throughout their extent.<br><br>The ALC assessment in **ES Appendix 5-2** (Doc Ref. 6.3 Rev 1) and **ES Appendix 5-3** (Doc Ref. 6.3 Rev 1) was based on the field observations recorded in situ rather than an assumption that all soils associated with the Wallasea or related soil series are calcareous. Where calcareous conditions were identified and considered relevant to the ALC assessment, these were taken into account within the grading process and are reflected in the final classification mapping, albeit over a relatively limited area. |

[21] DEFRA (2025) *Agricultural Land Classification of England and Wales. Guidelines for grading the quality of agricultural land*. Available at: https://publications.naturalengland.org.uk/publication/6257050620264448

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| | | Accordingly, it is incorrect to suggest that calcium carbonate testing was not undertaken or that its absence invalidates the assessment. Testing was undertaken and the results incorporated into the interpretation of soil wetness and land quality. Equally, the presence of calcareous soils as an associated component of the mapped soil association does not demonstrate that calcareous conditions occur universally across the survey area, nor does it invalidate the grading assigned to areas where field observations confirmed non-calcareous conditions.<br><br>For clarity, calcium carbonate testing was undertaken and informed the grading assessment. The omission of detailed discussion regarding negative test results should not be interpreted as an absence of testing. The comment therefore reflects a reporting clarification rather than a deficiency in the survey methodology or grading process. However, **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1) have been updated for Deadline 1 to clarify where negative tests were recorded. |

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| **LCC-096**<br>Field average ALC approach | What is the justification for Meridian's field average approach to ALC? Meridian state in 6.2.1 that "it is justifiable for the purpose of this report to adopt the field average approach to ALC as there was no in field evidence that variable grades within the same land parcel were managed differently". This allows them to include 235 ha of 3a land in 3b. In 5.4.9 of ES Chapter 5 they state this approach "complies with published methodology", whereas the opposite is true. The ALC guidelines state "Land is graded and mapped without regard to present field boundaries, except where they coincide with permanent physical features". | The Council refers to a statement within the MAFF ALC Guidelines[22][23] relating to variability within mapping units. It is noted that this statement forms part of a broader section of guidance that also addresses how variability should be considered in relation to mapping scale and the aggregation of field observations into coherent spatial units.<br><br>In full context, the relevant section of the Guidelines states:<br><br>*"The grade or subgrade of land is determined by the most limiting factor present. When classifying land, the overall climate and site limitations should be considered first as these can have an overriding influence on the grade. Land is graded and mapped without regard to present field boundaries, except where they coincide with permanent physical features.*<br><br>*A degree of variability in physical characteristics within a discrete area is to be expected. If the area includes a small proportion of land of different quality, the variability can be considered as a function of the mapping scale."* |

[22] DEFRA (2025) *Agricultural Land Classification of England and Wales. Guidelines for grading the quality of agricultural land*. Available at: https://publications.naturalengland.org.uk/publication/6257050620264448

[23] Ministry of Agriculture, Fisheries and Food (1988) *Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land*. Available at: https://publications.naturalengland.org.uk/publication/6257050620264448

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| | | This section then goes on to describe limitations associated with variation and "patchwork soils" which complicate management and cropping.<br><br>This statement sits within a wider methodological framework that requires point-based observations (auger and pit data) to be interpreted and generalised into mapping units defined by dominant soil and land characteristics. The purpose of this approach is to ensure that Agricultural Land Classification mapping reflects meaningful spatial variation rather than isolated or non-continuous occurrences, as is additionally outlined within the BSSS working with soil (How2 sheet 4.3.2)[24] which advises to "Keep inclusions of land of a different grade to a minimum (unit impurities)".<br><br>The approach adopted in the Scheme's assessment is consistent with that principle. Observed variability was considered in the context of its spatial extent, continuity, and relevance at the mapping scale used for the survey. Where slight variations in land quality were identified, these were assessed against the criteria for defining |

[24] British Society of Soil Science.(2018) Working With Soil – The Professional Competency Scheme. Agricultural Land Classification: England and Wales. How2 sheet 4.3.2

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| | | discrete mapping units rather than being treated as individual isolated inclusions requiring separate delineation.<br><br>The use of field average ALC mapping is undertaken at a scale that reflects the practical management and continuity of land quality across the field or parcel. As such, isolated or minority point observations of differing soil characteristics are assessed in the context of their spatial extent, continuity, and whether they represent a mappable and operationally distinct land resource.<br><br>In this survey, the occurrences of Subgrade 3a characteristics within areas mapped as Subgrade 3b were limited in extent and did not form continuous or readily definable land units capable of being mapped separately with confidence at the survey scale. The observed pattern was one of localised variability within a predominantly 3b resource rather than extensive tracts of distinct 3a land.<br><br>In practice, land is managed at field scale rather than on the basis of small within-field variations that lack sufficient extent or coherence to influence agricultural operations independently. Where higher-quality characteristics are limited in extent and embedded within a dominant lower-grade soil unit, they do not function as separate agronomically distinct areas capable of supporting differentiated management. |

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| | | Accordingly, the presence of limited 3a characteristics within a predominant 3b mapping unit does not, in itself, justify separate delineation or alter the classification of the overall unit. The presentation of field averages reflects the dominant limiting factors and the operational capacity of the area.<br><br>Notwithstanding the above, it is noted that both field-average and auger-by-auger point analyses were presented within the ALC Survey Reports and **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1), with the assessment of effects undertaken within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) being based on the auger-by-auger point analysis of ALC grades in order to present the worst-case assessment outcomes. |
| **LCC-097**<br>MAGIC ALC survey | Why have Meridian contradicted an earlier ALC survey on MAGIC GIS? They refer to one covering the land south of Queen's Bank Farm in Area B. What they do not explain is why this earlier survey, which showed the land to be in Grades 1, 2 and 3a, is now classified by Meridian as mainly Subgrade 3b. Some justification would be expected. | The earlier ALC survey referred to by the Council is available through the Natural England Access to Evidence database[25] and was considered during the desk study. However, the documentation available for that survey does not provide sufficient supporting information to enable a meaningful technical comparison with the ALC Survey Reports for the Scheme. In particular, the published material does not include detailed soil profile descriptions, |

[25] Resource Planning Group (1992) Agricultural Land Classification detailed Post 1988 ALC survey, Crowland, Postlands Estate (ALCC05791). Available at: https://publications.naturalengland.org.uk/publication/5590632018477056 [Accessed 28/07/2026

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| | | soil logs, or other field data presented in accordance with the MAFF Field Survey Handbook that would allow the basis of the grading decisions to be independently reviewed.<br><br>As a result, it is not possible to determine whether any apparent differences in grading arise from variations in survey methodology, survey density, interpretation of soil characteristics, site conditions at the time of survey, or other factors. Consequently, it would be inappropriate to draw conclusions regarding the reasons for any differences in classification solely from the published grading plans.<br><br>The ALC Survey Reports in **ES Appendix 5-2** (Doc Ref. 6.3 Rev 1) and **ES Appendix 5-3** (Doc Ref. 6.3 Rev 1) are based on site-specific field observations collected during the survey and interpreted in accordance with the MAFF Agricultural Land Classification Guidelines and Field Survey Handbook. The grading assigned reflects the soil and site conditions encountered during the survey and is supported by the recorded field evidence. In the absence of equivalent supporting data from the earlier study, no robust technical comparison between the two assessments can be undertaken. |
| **LCC-098**<br>Food production impacts | In light of the Council's significant concerns with the ALC survey methodology, interpretation and subsequent assessment, which have a direct bearing | The Applicant's responses to the detailed comments raised on the ALC survey are provided in rows above. The Applicant has also met with Natural England and LCC on 14 |

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| | on the extent of BMV land within the application boundary, our position at this stage is that the available evidence is insufficient to support the conclusions drawn in the EIA that the majority of the area taken by the proposed development is not BMV. In a situation where the downgrading of significant areas of otherwise mapped BMV land is critical to the weight to be afforded to soils and agriculture in the planning balance, the Council consider this to be a key area of concern that requires early attention in the Examination.<br><br>The potential impacts on soils, agricultural land and on food production, both in respect of this scheme and cumulatively with other NSIP projects that are consented and emerging in Lincolnshire, will be raised in more detail in the LIR and written submissions. | August 2026 to discuss and seek common ground on the ALC survey results. The Applicant's and stakeholders' position on the ALC survey is tracked through the **Statement of Common Ground with Natural England** (Doc Ref. 8.13) and **Statement of Common Ground with LCC** (Doc Ref. 8.11). |
| Socio-Economics | | |
| **LCC-099**<br>Temporary Workforce | The ES Chapter 14 estimates that during construction an average of 184 workers will be on site (14.8.3), of which approximately 110 will be from outside the area (14.8.5) and require temporary accommodation. These numbers are significantly lower than the estimates provided by other solar projects within Lincolnshire. However, it is noted that peak figures are quoted later in the document as being, at worst case, 855 workers, | The average workforce figure has been calculated by taking the mean average of the estimated monthly workforce across the full construction programme. As set out in **ES Chapter 2: The Scheme** [AS-017], construction of the Grid Connection Route will largely take place before construction begins on the Solar Development Area and Inter-Array Connections, with further stringing and reinstatement works continuing after the Solar |

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| | with approximately 470 requiring accommodation (14.8.18).<br><br>While the impact on tourist accommodation is considered (and it is noted that the intention is to direct overnight accommodation to large establishments), the impact of getting workers from accommodation to site needs further consideration. It is likely that, given the intention to focus accommodation in large establishments with 50+ rooms, it will result in the majority of workers being accommodated in Spalding or Peterborough and having to travel to site, which is in a location where public transport is very limited.<br><br>While it is appreciated that the 60-minute drive time that is used to identify the travel to work area (paragraph14.4.3) will have been established using a standard method, this should be used with caution. As raised in respect of other NSIPs, within Lincolnshire a 60- minute travel time covers a smaller area than would perhaps normally be expected. This then impacts upon other assumptions around workforce movements. | Development Area and Inter-Array Connections are complete. As a result, for a large proportion of the construction programme, only the Grid Connection Route will be under construction, meaning the workforce required during these periods is relatively low. This is why the mean average monthly workforce is substantially lower than the peak figure.<br><br>The peak workforce of 855 workers reflects the period when construction of the Grid Connection Route, Solar Development Area and Inter-Array Connections overlaps, resulting in a notably higher workforce requirement than at other points in the programme. It should be noted that the estimate of 855 workers is based on a worst-case scenario whereby the peak for the Solar Development Areas and Inter-Array Connections (650) overlaps with the peak for the Grid Connection Route (205). In practice, these two peaks may not coincide and therefore the actual peak may be substantially lower.<br><br>The number of workers expected to come from outside the area and require accommodation is derived from the leakage assumption in **ES Chapter 14: Socio-Economics and Land Use** [APP-065], which assumes that 60% of the workforce will be sourced from outside the 60-minute travel area.<br><br>There are a number of urban settlements within the 60-minute travel area that contain large (50+ room) |

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| | | establishments, including (but not limited to) Peterborough, Grantham, Boston, Wellingborough, Huntingdon, and St Neots. As outlined within **OCTMP** [APP-278], a shuttle service will be operated to transport up to 470 construction workers from 'staff clusters' which will be located within some of the aforementioned settlements. As such, it is unlikely that construction staff will need to use public transport to travel to site. |
| **LCC-100**<br>Visitor Attractions and Recreational Facilities | While in general the Council agree with the expected impacts set out in paragraphs 14.8.25 - 14.8.31, we do have concerns regarding the impact (both real and perceived) of, and the increase in, overhead cables to and from Weston Marsh. In particular, our concerns relate to impacts on Springfields Gardens and the Baytree Garden Centre and Owl Centre. | Within **ES Chapter 14: Socio-Economics and Land Use** [APP-065], direct effects through land take and indirect effects through severance on both Springfield Gardens and the Baytree Garden Centre and Owl Centre are assessed, and found to be not significant. Further amenity effects on these receptors related to the increased presence of overhead cables are assessed within **ES Chapter 12: Landscape and Visual** [APP-063] and **ES Chapter 13: Noise and Vibration** [APP-064]. Baytree Garden Centre and Owl Centre is likely to experience a significant visual effect during construction, operation and decommissioning works due to the visibility of the Grid Connection Route, but is not likely to experience any significant noise and vibration effects. Springfields Gardens is not likely to experience significant visual or noise effects. |

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| **LCC-101**<br>Visitor Economy and Economic Impact | The Council is extremely concerned with the visual degradation of the countryside and the consequent impact on the visitor economy, which is worth £2.9bn to Lincolnshire. Visitors come to Lincolnshire for its rurality and unspoilt countryside, our landscape, visitor economy attractions and places of interest. Overall, the proposals are an industrialisation of that countryside and will negatively affect our visitor offer and economic vibrancy and will change the visual impact/beauty of the area. The Council has significant concerns regarding the impacts of solar developments and their associated infrastructure on the public perception of Lincolnshire. In particular, the Fens offer long, uninterrupted views which will be disrupted by developments such as the one proposed here. | **ES Chapter 14: Socio-Economics and Land Use** [APP-065] includes an assessment of potential effects on tourism arising from the Scheme comprising consideration of impacts on local accommodation facilities, recreational receptors and visitor attractions. The Socio-Economic assessment also acknowledges that tourism makes a notable contribution to the region's economy and that there are a number of facilities and businesses which attract tourists in the local area. However, taking into account direct land take impacts as well as indirect severance effects, the assessment in Section 14.8 concludes that overall the impact of the Scheme on tourism is not significant during the construction, operation, and decommissioning phases. Potential visual impacts of the countryside arising from the Scheme are assessed within **ES Chapter 12: Landscape and Visual** [APP-063], which concludes that whilst the Scheme would result in significant adverse landscape and visual effects, particularly through changes to the characteristic openness and long, uninterrupted views that define the Lincolnshire Fens, these effects would be localised to the areas surrounding the Scheme and diminish with distance. The wider perception and identity of the Fens as an extensive open landscape would remain, with mitigation planting reducing visual effects over time whilst retaining long-distance views through designed gaps in planting. |

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| **LCC-102**<br>Employment and Skills | As the scheme progresses and should it be successful in its DCO application, efforts to maximise local employment should be taken. The reference in paragraph 14.9.2 to the Outline Skills, Supply Chain and Employment Plan [APP-283] is acknowledged. Ongoing dialogue with local skills providers, both public and voluntary sector is recommended. These may include: Lincoln College, Boston College and LCC Employment and Skills team. The upskilling of local residents, either through retraining, or apprenticeships, will help ensure that the right skills are available for the proposed development, while also providing long term benefits to the area through a higher skilled workforce. | This comment is noted. **Outline Skills, Supply Chain and Employment Plan** (Doc Ref. 7.17 Rev 1) provides a framework for maximising local employment and upskilling local residents. Further details of the approaches and commitments to securing these local benefits will be laid out within a full Skills, Supply Chain, and Employment Plan, which will be developed prior to construction if the Scheme is granted development consent. |
| **LCC-103**<br>Cumulative Impacts | Lincolnshire is experiencing a significant number of NSIP proposals, with in excess of 20 schemes at various stages of the DCO process. This is not to mention the dozens of TCPA applications in Lincolnshire for major energy infrastructure. The effects of this potentially significant industrialisation and its local environmental, landscape, historic and community impacts, must be carefully assessed. The impact on the county's perception by visitors and tourists, as well as residents and businesses, is material to the Government's decision and must be considered. | The cumulative effects assessment methodology set out in **ES Chapter 14: Socio-Economics and Land Use** [APP-065] has been developed in line with established best practice, using defined Zones of Influence (ZoI) that reflect the nature and extent of the effects being assessed, informed by professional judgement and precedent from comparable schemes.<br><br>For visitor accommodation, the assessment has focused on solar and electrical infrastructure NSIPs within 30km, reflecting that these project types require a technically skilled workforce with specialist skills specific to solar and |

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| | The list of schemes at Appendix 4-1 is noted, however, it is recommended that for the purposes of impacts on temporary worker accommodation all NSIPS are considered, not just solar and electrical infrastructure schemes. Any NSIP where their identified 60-minute travel to work area overlaps with the travel to work area for this scheme should be considered, as there is the potential for overlapping accommodation requirements. In particular, the Springwell Solar project should be included within the listed schemes. This now has a decision, and there will be an overlap in the travel to work areas. As discussed with other schemes, there is likely to be significant demand for, and pressure on, overnight accommodation to the point that there is a serious potential for demand to exceed capacity at times. | electrical infrastructure. Other forms of NSIP development are more likely to draw on the less-specialised skills available within the local labour market, and are therefore less likely to place material pressure on the same accommodation stock.<br><br>The 30km ZoI applied to solar and electrical infrastructure NSIPs for the purposes of the accommodation assessment reflects the approximate 60-minute drive-time catchment used elsewhere in the socio-economic assessment for this part of Lincolnshire, given typical road speeds and network characteristics in this rural area. Where NSIPs are located further afield and have an overlapping 60-minute drive time, it is acknowledged that there is some potential for them to place pressure on the same pool of temporary accommodation as the Scheme. However, there would be other accommodation available within the catchments of these NSIPs which the Scheme would not draw on. The potential for meaningful overlap in accommodation demand reduces with distance beyond the 30km ZoI. As noted in **ES Chapter 14: Socio-Economics and Land Use** [APP-065], the sum of the total peak staff for each NSIP included within the assessment has been used, but in reality is unlikely that all projects will have the same construction schedule, and it is probable that the peak workforces of all projects will not |
| **LCC-104**<br>Weston Marsh cumulative infrastructure | The cumulative impacts of schemes on the Weston Marsh area also needs to be fully considered. The number of schemes that are to feed into and out of the proposed substation will result in a high number of overhead cables in the area that will be highly visible from the A16 and A151. These are main routes to attractions in the area, that include Springfields and Baytree Garden Centre and Owl Centre. | |

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| **LCC-105**<br>Cumulative assessment guidance | The inter-cumulative impacts of these proposals do not appear to be sufficiently well analysed or mitigated in this or, potentially, other applications of this type, even when utilising the following guidance:<br><br>Government guidance within 'Nationally Significant Infrastructure projects: Advice on Cumulative Effects Assessment' This guidance encourages applicants to use GIS software and to: a) adequately identify other developments; b) not to limit themselves and their search in terms of the type of proposed NSIPs; c) to properly consider the nature and capacity of the receiving environment. | perfectly overlap. In addition, in terms of accommodation supply and number of available rooms, the same establishments (major hotels within 60-minutes' drive of the Scheme) have been included, even though there are likely to be other major hotels within the catchment of the other cumulative solar electrical infrastructure NSIPs which are not included within the supply. Therefore, the approach taken is considered to represent a reasonable worst-case scenario, and to be proportionate.<br><br>With specific regard to Springwell Solar, this scheme is located approximately 34km from the Scheme, outside the 30km ZoI applied within the accommodation assessment.<br><br>**ES Chapter 12: Landscape and Visual** [APP-063] concludes that there would be no further significant cumulative visual effect on Springfields Gardens and Baytree Garden Centre and Owl Centre, considering the change in the landscape that would occur with cumulative schemes. |
| Public Health | | |
| **LCC-106**<br>Public health impacts | LCC Public Health recognises the long-term benefits of renewable energy generation for population health, including climate change mitigation. However, we have concerns regarding the potential impacts of the proposed development on health and wellbeing, particularly: • Construction-related disruption (noise, dust, and traffic) • Impacts on mental health and | Applicant's detailed responses on each of the points are responded to in detail under subsequent paragraphs. |

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| | wellbeing • Health inequalities, including impacts on vulnerable and rural populations • The adequacy of the assessment of electromagnetic fields (EMF) • Limited clarity on health-enhancing opportunities and community benefit | |
| **LCC-107**<br>Health Impact Assessment | Public Health welcomes the inclusion of a dedicated human health chapter within the Environmental Statement. However, we maintain that a more comprehensive Health Impact Assessment (HIA) would provide a more robust and transparent evaluation, including greater emphasis on mental health impacts, long-term and cumulative effects, and health inequalities. | The potential effects of the Scheme on health and wellbeing during the construction, operation, and decommissioning phases are comprehensively assessed within **ES Chapter 10: Human Health** [APP-061]. This provides a proportionate and transparent assessment of the likely health effects associated with the Scheme.<br><br>The assessment has been undertaken in accordance with the Institute of Environmental Management and Assessment (IEMA) (now Institute of Sustainability and Environmental Professionals (ISEP)) guidance[26] and considers a comprehensive range of health determinants relevant to the Scheme, including air quality, dust; electric and magnetic fields (EMFs); employment and training opportunities; landscape and visual effects; noise and vibration; access to Public Rights of Way (PRoW) and opportunities for active travel; traffic and access; social infrastructure; and mental health and wellbeing. The |

[26] Institute of Environmental Management and Assessment (2015) Environmental Impact Assessment Guide to: Climate Change Resilience and Adaptation. Lincoln: IEMA. Available at: https://www.isepglobal.org/content/isep-eia-guide-to-climate-change-resilience-and-adaptation-2020/. Accessed: 31 July 2026.

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| | | significance of health effects is determined in line with the ISEP guidance, and residual effects are clearly set out.<br><br>**ES Chapter 10: Human Health** [APP-061] has been informed by consultation responses received throughout the EIA process, including at Scoping and during statutory consultation. As set out in Table 10-3 of the chapter, a meeting was held with key stakeholders including Lincolnshire County Council, South Holland District Council, the Office for Health Improvement and Disparities (OHID) and the UK Health Security Agency (UKHSA) to obtain their inputs into the assessment. Engagement was also pro-actively sought with a number of community groups to follow-up on the issues they raised at statutory consultation. A wider consultation programme bespoke to the health assessment, as would be undertaken for a more comprehensive Health Impact Assessment, would not be a proportionate or effective approach to assessing the health effects of the Scheme.<br><br>The assessment considers potential effects on both the general population and vulnerable groups, including those within rural communities, and incorporates consideration of health inequalities, where relevant. Cumulative effects have also been assessed, including the potential for combined effects across the health determinants. |

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| **LCC-108**<br>Health inequalities | The proposed development spans multiple wards with differing demographic and socioeconomic characteristics. There are existing health inequalities across Lincolnshire, particularly in rural and agricultural communities, alongside a higher prevalence of chronic conditions (e.g. cardiovascular and respiratory disease). We would expect explicit assessment of impacts on vulnerable populations, with targeted mitigation where required, to ensure that existing inequalities are not exacerbated. Changes to the environment and landscape may disproportionately affect certain groups. | The assessment presented within **ES Chapter 10: Human Health** [APP-061] considers both the general population and vulnerable populations through the application of different sensitivity levels, recognising that certain groups may experience greater susceptibility to health effects, including those associated with changes to the landscape and visual environment. **ES Chapter 10: Human Health** [APP-061] identifies the vulnerable groups considered within the assessment, including older people, people with existing illnesses or disabilities, people with mental health conditions, children and young people, those living in areas of higher deprivation, people experiencing poor or very poor health, agricultural workers, and armed forces personnel and veterans. The baseline provides data on existing and future conditions within the study area, including population and demographics, economic factors, general health, mental health, disability, and wider health determinants, including life expectancy, childhood obesity, smoking prevalence, and mortality associated with respiratory diseases.<br><br>Drawing on the residual effect findings from the ES technical chapters relevant to the health determinants, the assessment did not identify any significant adverse effects for either the general population or vulnerable groups. Therefore, no additional mitigation measures were considered necessary. Embedded mitigation measures were |

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| | | set out in Section 10.7 of **ES Chapter 10: Human Health** [APP-061]. |
| **LCC-109**<br>Public health impacts | During the construction phase, impacts such as reduced air quality, noise and vibration, and increased traffic may affect local amenity and population health. Therefore, robust mitigation and controls will be required to protect nearby communities | Impacts on health during the construction phase have been assessed within **ES Chapter 10: Human Health** [APP-061], including potential effects associated with air quality, noise and vibration, and increased traffic, drawing on the relevant technical ES chapters, where appropriate. These effects were assessed as not significant during the construction phase for both the general population and vulnerable populations and, therefore, no additional mitigation measures or controls were considered necessary. As set out in **ES Chapter 10: Human Health** [APP-061], various embedded mitigation measures are incorporated into the Scheme design and the management plans submitted with the DCO application, such as the **OCEMP** (Doc Ref. 7.10 Rev 2), to reduce effects on local amenity.<br><br>Health is defined within **ES Chapter 10: Human Health** [APP-061] as encompassing both physical and mental health. The chapter also considered mental health as a determinant, and therefore explicitly assessed the impact of the Scheme on mental health, considering the loss of open views, changes to landscape character, and sense of enclosure, drawing on the findings of **ES Chapter 12: Landscape and Visual** [APP-063]. Effects on mental health were assessed to be not significant during the construction, |
| **LCC-110**<br>Mental wellbeing | There are also concerns regarding long-term mental wellbeing, particularly for residents living alongside large-scale infrastructure. Potential impacts include loss of open views, changes to landscape character, a sense of enclosure, and cumulative impacts alongside other developments. These effects should be fully assessed and addressed. | |

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| | | operation, and decommissioning phases and therefore additional mitigation was not considered necessary.<br><br>A cumulative assessment of all health determinants, including mental health, was presented in Section 10.11 of **ES Chapter 10: Human Health** [APP-061]; this concluded no significant cumulative effects. |
| **LCC-111**<br>Electromagnetic fields | Public Health does not agree that impacts relating to Electromagnetic fields (EMF) can be dismissed through assumption alone. A full assessment of EMF should be provided, including emissions from grid connection infrastructure and potential cumulative or overlapping exposures. This should demonstrate compliance with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines. | A full assessment of EMFs, including calculations of electric and magnetic fields from the infrastructure introduced by the Scheme and potential cumulative and overlapping exposures is provided in **Electric and Magnetic Fields Compliance Report** [APP-273], with a summary provided within Section 16.3 of **ES Chapter 16: Other Environmental Topics** [APP-067]. The assessment concludes that the levels of EMFs from the Scheme (including overhead lines, underground cables, solar stations, On-Site Substation and BESS Compounds) are predicted to be well below the public exposure reference levels set out in by ICNIRP guidelines[27] at all surrounding locations where public exposure levels are relevant. This remains true when considering the cumulative scenario of the Grimsby to Walpole scheme or the Weston Marsh to East |

[27] International Commission on Non-Ionizing Radiation Protection (ICNIRP) (2010) Guidelines for Limiting Exposure to Time-Varying Electric and Magnetic Fields (1 Hz–100 kHz). Health Physics, 99(6), pp. 818–836. Available at: https://www.icnirp.org/en/publications/article/lf-gdl-2010.html. Accessed: 31 July 2026

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| | | Leicestershire scheme being located in close parallel alignment with the Grid Connection Route of the Scheme. |
| **LCC-112**<br>Health and access opportunities | The Council encourages the maximisation of landscape, access, and health opportunities arising from the project, including enhancing green infrastructure, improving PRoW and active travel, and supporting physical activity and wellbeing. Given the scale of the development, meaningful community benefit, including potential support relating to fuel poverty, should also be explored.<br><br>Public Health therefore seeks to engage constructively in the Examination to ensure that health outcomes are fully considered and protected. | As outlined in **ES Chapter 10: Human Health** [APP-061], the Scheme is likely to generate a number of community benefits. These include direct and indirect jobs during the construction, operation and decommissioning phases. The employment opportunities would be predominantly within the renewable energy sector, including solar installation and electricity infrastructure, contributing to the development of skills required for the UK's transition to net zero and supporting local economic growth. The **Outline Skills, Supply Chain and Employment Plan** (Doc Ref. 7.17 Rev 1) provides a framework for maximising local employment and upskilling local residents. Further details of the approaches and commitments to securing these local benefits will be laid out within a full Skills, Supply Chain, and Employment Plan, which will be developed prior to construction if the Scheme is granted development consent.<br><br>In relation to access and active travel, a permissive path will be provided connecting existing Public Rights of Way between Queens Bank and Shepeau Stow. The route will be suitable for pedestrians, cyclists and horse riders, providing opportunities for recreation, physical activity and improved connectivity. Information boards will also be provided along the route to enhance understanding of the historic and natural environment, supporting the wider |

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| | | landscape and green infrastructure benefits associated with the Scheme.<br><br>The Applicant is also committed to providing a Community Benefit Fund to invest in local projects over the lifetime of the Scheme. In addition, the Scheme will provide biodiversity net gain, as set out within the **Biodiversity Net Gain Report** (Doc Ref. 7.9 Rev 1), enhancing the local green infrastructure.<br><br>The Applicant welcomes Lincolnshire County Council Public Health's engagement in the Examination. |
| Fire Safety | | |
| **LCC-113**<br>BESS fire safety guidance | In recognition of the evolving nature of Battery Energy Storage Systems (BESS) and the specific challenges they present to Fire and Rescue Services, national planning and fire safety guidance has been updated to reinforce the importance of early and ongoing engagement between developers, planning authorities and Fire and Rescue Services.<br><br>Current Renewable and Low Carbon Energy Planning Policy Guidance encourages local planning authorities to consult their relevant Fire and Rescue Service as part of formal planning consultations for developments incorporating BESS. Developers are also directed to have regard to the National Fire Chiefs Council (NFCC) guidance for BESS schemes, | Section 1.6 of the **Outline Battery Safety Management Plan** (OBSMP) [APP-284] documents the Applicant's consultation process with Lincolnshire Fire and Rescue Service (LFR) who are a statutory consultee for the OBSMP.<br><br>Communication was established early in the Scheme with LFR and will continue across planning, design, construction, operation, and decommissioning phases. This will ensure robust emergency response planning, risk management planning and ensure all safety materials and equipment is available in an emergency for first responders.<br><br>The Scheme design and documentation is fully compliant with UK NFCC 'Grid Scale Battery Energy Storage System planning – Guidance for FRS (2026)'. |

| Topic | Matter Raised | Applicant's Response |
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| | which sets out expectations in relation to fire safety design, construction, operation, monitoring and emergency response. Lincolnshire Fire and Rescue Service (LFR) have developed standing advice for BESS informed by national NFCC guidance. Through this engagement, a programme of monitoring, inspection and risk assessment has been identified which will be required following the establishment of the BESS to ensure continued compliance with the Outline Battery Management Safety Plan and the Emergency Response Plan. See Appendix A for further guidance from LFR. | As stipulated in Section 1.2.2 of the **OBSMP** [APP284]: "The design of the BESS and its impact are controlled in several ways. Prior to commencement of construction of the BESS, a BSMP (in accordance with the OBSMP) is required to be submitted to the relevant local planning authority and approved, in consultation with Lincolnshire Fire and Rescue Service (LFR) and the Environment Agency (EA). The Applicant must operate the BESS in accordance with the approved plan." |
| **LCC-114**<br>BESS monitoring resourcing | During the first year of BESS operation, this programme will require an estimated 21 days of Fire and Rescue Service input, reflecting the need for enhanced oversight during commissioning and early operation. Thereafter, the anticipated requirement reduces to two days per annum for the lifetime of the development, to support ongoing monitoring, review of risk information and maintenance of operational familiarity. | The Applicant notes these comments and will seek to facilitate all reasonable LFR requirements for the Scheme. |
| **LCC-115**<br>BESS monitoring and assurance | This programme of monitoring and assessment will enable:<br><br>Early and continued engagement with LFR to ensure applicable standards and national guidance are being | The Applicant notes these comments and will seek to facilitate all reasonable LFR requirements for the Scheme. |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | met; • Oversight of BESS construction and commissioning to confirm it is delivered in accordance with approved fire safety measures; • The development, review and periodic updating of site-specific Emergency Response Plans; • Familiarisation visits and operational awareness briefings for local fire crews; • Ongoing review of maintenance regimes and risk information as the BESS operates; and • Assurance to local residents and communities that the BESS at Meridian Solar Farm is subject to independent inspection and monitoring aimed at minimising the risk of fire. | |
| **LCC-116**<br>LFR financial contribution | To enable LFR to undertake this necessary monitoring and assurance role, and to ensure adequate resources are available, a financial contribution is proposed via the Protective Provisions within the Development Consent Order, in accordance with Requirement 6(2). This contribution will support LFR in discharging its responsibilities in relation to the BESS associated with the Meridian Solar Farm. | The Applicant notes Lincolnshire Fire and Rescue's request for a financial contribution in connection with its role in relation to the Battery Energy Storage System. The Applicant is continuing to engage constructively with Lincolnshire Fire and Rescue regarding the inclusion of protective provisions within the draft DCO, including consideration of the matters raised in its Relevant Representation. The position remains under discussion between the parties. |
| **LCC-117**<br>LFR engagement | The Applicant has actively engaged with Lincolnshire Fire and Rescue Service throughout the pre-application stage and will continue to do so as the project progresses. | The Applicant continues to engage with Lincolnshire Fire and Rescue Service (LFR), and will include the relevant matters within the Statement of Common Ground (SoCG) with Lincolnshire County Council. |

| Topic | Matter Raised | Applicant's Response |
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| | No further comments are made at this stage, however, should additional matters arise these will be addressed within the Local Impact Report or subsequent stages of the consenting process. | |
| Draft Development Consent Order | | |
| **LCC-118**<br>Other consultees and specialist comments | At this stage the Council wishes to reserve its position on the relevant parts of the draft DCO, including the proposed requirements which are likely to be needed, to be amended or added to as the examination progresses.<br><br>The Council will review the draft DCO in detail to ensure that the Council's role is sufficiently recognised as a discharging authority in relation to relevant requirements and that the Council's role as Highway Authority is appropriately referenced within the draft DCO in relation to any proposed highway works or traffic regulation measures. This applies also to the Council's role as Lead Local Flood Authority (LLFA). The Council wishes to participate in any Issue Specific Hearing in relation to the drafting of the DCO. | The Applicant notes the Council's comments and welcomes its continued engagement on the **Draft DCO** (Doc Ref. 3.1 Rev 2). The Applicant will continue to review any comments and proposed amendments submitted during the examination process.<br><br>The Applicant acknowledges the Council's roles as local planning authority, highway authority and Lead Local Flood Authority, and will continue to engage with the Council throughout the examination in relation to the **Draft DCO** (Doc Ref. 3.1 Rev 2). The Applicant welcomes the Council's participation in any Issue Specific Hearing concerning the Draft DCO and will consider any detailed drafting comments submitted during the examination. |

2.3.2. Table 2-3 below sets out the Applicant's response to the issues raised within Appendix B (RAC Report) to the Relevant Representation from Lincolnshire County Council [RR-111] including signposting to the relevant sections of the DCO Application.

**Table 2-3A RAC Report**

| Appendix B - RAC Report | Applicant's Response |
|---|---|
| ES Chapter 5: Agriculture and Soils | |
| NE and Meridian discussed the findings of the initial survey on 04/09/2024. "*Natural England confirmed receipt of the ALC survey report and that they held no specific concerns with the report or its findings*".<br><br>NE and Meridian subsequently discussed the detailed ALC 0n 09/09/2025 and in 01/2026. No concerns were raised about the findings of the survey in either meeting.<br><br>LCC wish to discuss the findings of the detailed ALC survey with Natural England in the light of its Revised Guidance updated in 2025 and historical detailed mapping carried out by the Soil Survey of England and Wales. | The Applicant notes this comment. The 2025 update of the 1988 MAFF Guidelines[28] did not introduce changes to grading criteria or reference climate data from the earlier document. The Applicant has also met with Natural England and LCC on 14 August 2026 to discuss and seek common ground on the ALC survey results. The Applicant's and stakeholders' position on the ALC survey is tracked through the **Statement of Common Ground with Natural England** (Doc Ref. 8.13) and **Statement of Common Ground with LCC** (Doc Ref. 8.11). |
| According to Appendices 5.2 and 5.3, para 6.2.1:<br><br>"*The methods of point-by-point and field average data did not generate a significant variation to the presented grades in Tables 4 and 5, it would be justifiable for the purpose of this report to adopt the field average approach as there was no in field evidence that variable grades within the same land parcel were managed differently. Based on field average data, the majority of land surveyed as part of this assessment has been identified as ALC Grade 3b*"<br><br>This statement does not align with ALC guidance | The quoted statement sits within a wider methodological framework that requires point-based observations (auger and pit data) to be interpreted and generalised into mapping units defined by dominant soil and land characteristics. The purpose of this approach is to ensure that Agricultural Land Classification mapping reflects meaningful spatial variation rather than isolated or non-continuous occurrences. |

[28] Department for Environment, Food and Rural Affairs and Welsh Government (2025) Agricultural Land Classification of England and Wales: Guidelines for grading the quality of agricultural land. JP069. Available at: https://publications.naturalengland.org.uk/publication/6257050620264448 (Accessed: 31 July 2026).

| Appendix B - RAC Report | Applicant's Response |
|---|---|
| notes (1988, 1996 & 2025) which all state that: "*The grade or subgrade of land is determined by the most limiting factor present. When classifying land the overall climate and site limitations should be considered first as these can have an overriding influence on the grade. Land is graded and mapped without regard to present field boundaries, except where they coincide with permanent physical features*"<br><br>The point-by-point auger survey results and interpretation should be applied in any project where the aim is to minimise the use of the best land. | Nonetheless, in response to consultation with Natural England both approaches to data presentation were included in **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) and assessment of effects determined on the basis of the worst-case outcome. |
| A full set of auger logs is provided for the mapped observation points. Only two soil pits have been dug (but not described in detail) across the whole proposed development area and the images of the pits do not clearly reflect the characteristics of the soil profile. Whilst this may be seen as an acceptable minimum to provide a single pit for each soil type encountered, in this case, pits should be dug and examined to confirm the characteristics of the natural poorly permeable layer recorded throughout the proposed development area in which the 3b assessment is based. | The excavation and assessment of soil inspection pits was undertaken in accordance with the Guidelines and Field Survey Handbook[29]. Soil pits characterise each identified soil type and verify the soil profile characteristics recorded during auger observations. There was consistency between soil pits and to avoid repetition the ALC Survey Reports presented generalised soil profiles for each soil type. In response to this comment, the full soil pit logs and descriptions have now been provided within **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1) at Deadline 1. |
| Guiding design is a primary purpose of the ALC survey to ensure that policy as set out in Overarching National Policy Statement for Energy (EN-1) is met. | The principles for site selection are set out within **Appendix D: Site Selection Report of the Planning Statement** [APP-264]. Paragraph 3.3.26 of the **Site Selection Report** [APP-264] states 'that there is no |

[29] Hodgson, J.M. (1997) Soil Survey Field Handbook: Describing and Sampling Soil Profiles. 3rd edn. Harpenden: Soil Survey of Great Britain (England and Wales). Available at: https://publications.naturalengland.org.uk/publication/6751226501791744. Accessed: 31 July 2026.

| Appendix B - RAC Report | Applicant's Response |
|---|---|
| Para 5.11.12 of EN1 states that: "*Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).*" *Para 5.11.34 goes on to state that "The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality."*<br><br>The site of the proposed development is classified as Grade 1 and 2 on the Provisional ALC map and the EIA fails to justify the selection of the site in terms of demonstrating that the location is either necessary or is outweighed by benefits necessitating the development of BMV land. | land of sufficient scale for a 750MW solar farm that is located within proximity to the PoC which does not have a high likelihood of BMV land, making complete avoidance of BMV agricultural land impossible for the Scheme'.<br><br>The **Site Selection Report** [APP-264], paragraphs 3.4.5 to 3.4.14 then set out how the initial reconnaissance ALC survey, and then subsequent detailed level ALC surveys, have been used to avoid infrastructure on the highest grade agricultural land. As part of the design evolution, over 69ha of BMV land has been excluded from physical development and will be kept in arable use and managed to provide biodiversity benefits within the Order Limits.<br><br>Paragraph 2.10.21 of EN-3 gives preference to the development of solar PV generation on poor quality land in order to avoid the use of BMV land where possible, but is explicit that "*land type should not be predominating factor in determining the suitability of the site*".<br><br>The Applicant is confident that its approach to site selection is consistent with the requirements of paragraph 5.11.12 of EN-1. |
| Outline Soil Management Plan | |
| The baseline description sets out the components making up two soil associations and a summary of four separate soil profiles identified. There is no baseline description of soils nor map showing the distribution of the soils identified within the proposed development area to allow comparison of physical and chemical soil characteristics pre- and post-development. | The **OSMP** (Doc Ref. 7.14 Rev 1) cross-references to **ES Appendices 5-2 and 5**-3 (Doc Ref. 6.3 Rev 1) in which soils are mapped and characterised. |

| Appendix B - RAC Report | Applicant's Response |
|---|---|
| The OSMP fails to refer to ISEP guidance on Soil Health and Environmental Assessment and the use of baselines to monitor change and inform rehabilitation where necessary.<br><br>The OSMP includes no indication of management methods proposed to monitor, maintain and enhance soil and plant health across the proposed development area. | The **OSMP** (Doc Ref. 7.14 Rev 1) does not refer to the recent ISEP guidance[30] on soil health. Measuring soil health presents practical challenges due to natural variability, seasonal changes and the influence of land management on biological and chemical properties. Furthermore, the guidance notes that *'the larger a proposed development scheme, and particularly for large linear infrastructure projects, the more difficult it is to achieve a consistent pattern of sampling that considers both temporal and spatial variations in soil health indicators. In these instances, the soil health assessment will inevitably be more general.'* Recognising these difficulties, the **OSMP** (Doc Ref. 7.14 Rev 1) emphasizes compliance with good soil management practices.<br><br>The **OSMP** (Doc Ref. 7.14 Rev 1) confirms that the detailed SMP will set out features to be observed as measures of poor soil health (paragraph 5.6.6). It identifies that regular inspection is required and that unsatisfactory soil and plant health will lead to specialist technical advice. |
| ES Figure 5-2 | |
| This methodology does not align with ALC guidance notes (1988, 1996 & 2025) which all state that: "*The grade or subgrade of land is determined by the most limiting factor present. When classifying land the overall climate and* | ALC survey data is presented for both field averaged data (**ES Figure 5-2** [APP-089]) and point by point auger data (**ES Figure 5-1** [APP-088]). The inclusion of **ES Figure 5-2** [APP-089] is for information |

[30] Institute of Sustainability and Environmental Professionals (ISEP) (2025) Soil Health in Environmental Assessment. Available at: https://www.isepglobal.org/media/rfhnz2im/isep-soil-health-in-environmental-assesment-2025.pdf. Accessed: 31 July 2026.

| Appendix B - RAC Report | Applicant's Response |
|---|---|
| *site limitations should be considered first as these can have an overriding influence on the grade. Land is graded and mapped without regard to present field boundaries, except where they coincide with permanent physical features*" | only, whilst the assessment of effects within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) is determined on the basis of the auger by auger point ALC classification, illustrated on **ES Figure 5-1** [APP-088]. |
| ES Chapter 14: Socio-economics and Land Use | |
| The Socio-Economics chapter of the ES fails to take into account ISEP guidance that "*Displacement of tenant farmers and agricultural workers is a socio-economic impact and where there is a cluster of large solar arrays there may be a cumulative downstream socio-economic impact on the local agricultural supply industry such as seed, fertiliser and feed merchants, and agricultural contractors*".<br><br>Whilst the EIA identifies individual landowners (there are no tenants) affected by the proposed development, it fails to identify the impacts associated with the loss of land on employment, food production, and businesses up and down the agricultural supply chain.<br><br>The assessment also fails to take adequately into account the cumulative impacts of ongoing solar and renewable developments on available agricultural land and specifically BMV land in Lincolnshire. | **ES Chapter 14: Socio-Economics and Land Use** [APP-065] assesses the likely impacts on agricultural employment and concludes that there would be no loss of agricultural employment arising from the construction and operation of the Scheme. The agricultural land within the proposed Solar Development Area would continue to generate income for the landowners, and as the land is not farmed by tenants, would not result in any loss of jobs. There may be some contractors who undertake some farming activities on the land, but it is very likely that such contractors would not be entirely reliant on these farms for employment. Areas of agricultural land within the Grid Connection Route and Inter-Array Connections would experience minimal permanent land take which would be limited to the bases of overhead pylons and would consequently not have their current agricultural activities altered enough to result in the loss of agricultural employment.<br><br>It is acknowledged that the ES does not include a specific assessment of effects on businesses along the wider agricultural supply chain, or on regional food production. However, given the conclusion that no material loss of agricultural employment is anticipated, and that the majority of affected landowners within the Grid Connection Route |

| Appendix B - RAC Report | Applicant's Response |
|---|---|
| | and Inter-Array Connections would not experience any substantial change to their farming activities, it is considered reasonable to conclude that the Scheme would not have a significant effect on regional food production or the wider agricultural supply chain. As outlined within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1), approximately 1.1% of all BMV land in Lincolnshire is expected to be temporarily used cumulatively for the solar schemes identified within Table 5-17. Given the relatively small amount of BMV land lost as a result of these solar developments, there are not expected to be any further significant cumulative effects on agricultural employment, food production, or the agricultural supply chain. |
| ES Chapter 3 Alternatives and Design Evolution | |
| All land within approximately 15km of the site is mapped at 1:250,000 as BMV. It is unclear whether the provision of a grid connection was unsolicited by the developer and the site selected on the grounds that the availability of a grid connection clearly outweighed 5.11.12 of EN-1, which states that "*Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5)*". | The principles for site selection are set out within **Appendix D: Site Selection Report of the Planning Statement** [APP-264]. Paragraph 3.3.26 of the **Site Selection Report** [APP-264] states 'that there is no land of sufficient scale for a 750MW solar farm that is located within proximity to the PoC which does not have a high likelihood of BMV land, making complete avoidance of BMV agricultural land impossible for the Scheme'.<br><br>The **Site Selection Report** [APP-264], paragraphs 3.4.5 to 3.4.14 then set out how the initial reconnaissance ALC survey, and then subsequent detailed level ALC surveys, have been used to avoid infrastructure on the highest grade agricultural land. As part of the design evolution, over 69ha of BMV land has been excluded from |

| Appendix B - RAC Report | Applicant's Response |
|---|---|
| | physical development and will be kept in arable use and managed to provide biodiversity benefits within the Order Limits.<br><br>While paragraph 2.10.21 of EN-3 gives preference to the development of solar PV generation on poor quality land in order to avoid the use of BMV land where possible, it is explicit that "*land type should not be predominating factor in determining the suitability of the site*".<br><br>The Applicant is confident that its approach to site selection is consistent with the requirements of NPS EN-1. |
| The option for east west oriented vertical panels set out to allow continued agricultural use of the land (agrivoltaics) has not been considered. | The Applicant's response to this comment in set out above (ref. LCC-012). |
| 6.2 ES Figures 14-1 – 14-7 | |
| The figures fail to identify the ownership of land affected by the proposed development. This makes it impossible to identify the areas of land taken from individual farm businesses and the impacts on those businesses and associated up and downstream businesses. | Details of the relevant land parcels and associated landowners are available within the **Book of Reference** [Doc Ref. 4.3 Rev 2], the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2) and the **Land and Crown Land Plans** (Doc Ref. 2.4 Rev 2). As set out above, given the conclusion that no material loss of agricultural employment is anticipated, and that the majority of affected landowners within the Grid Connection Route and Inter-Array Connections would not experience any substantial change to their farming activities, it is considered reasonable to conclude that the Scheme would not have a significant effect on regional food production or the wider agricultural supply chain. |

## 2.4. Fenland District Council

2.4.1. Table 2-4 below sets out the Applicant's response to the issues raised within the Relevant Representation from Fenland District Council [RR-049] including signposting to the relevant sections of the DCO Application.

2.4.2. Where text within the representation summarises the documentation submitted by the Applicant, it has not been reproduced in the table below.

**Table 2-4: Fenland District Council**

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| Transport and Environmental Health | FDC has reviewed the submitted transport and environmental information and raises no objection on transport or environmental health grounds. The evidence indicates that construction traffic routes are not proposed through the Fenland road network and that impacts on Fenland residents in terms of noise, vibration, air quality and lighting are likely to be negligible.<br><br>Nevertheless, given the proximity of parts of the development to the district boundary, FDC requests continued engagement during the construction phase, including notification of any out-of-hours working approvals and provision of appropriate contact details for construction activities such as piling works. | The Applicant welcomes FDC's confirmation that it has no objection to the Scheme on transport or environmental health grounds.<br><br>In accordance with Requirement 4 of the **Draft DCO** (Doc Ref. 3.1 Rev 2), a Community Liaison Group must be established prior to the commencement of the Scheme to facilitate liaison between representatives of people living in the vicinity of the Order Limits and other relevant organisations in relation to the construction of the Scheme. Furthermore, the **Outline CEMP** (Doc Ref. 7.10 Rev 2) sets out that a Community Liaison Officer would act as the primary point of contact for queries or complaints throughout construction and commissioning. These measures will ensure that Fenland District Council can remain informed on construction activities during the construction period. |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| Loss of Best and Most Versatile Agricultural Land | FDC's principal concern relates to the development's impact on areas of Grade 1 and Grade 2 agricultural land, classified as Best and Most Versatile (BMV) land. The Council considers this to be a nationally important and finite resource that should be protected wherever possible. FDC believes the applicant should demonstrate more clearly that reasonable alternatives, including lower-grade agricultural land and previously developed land, have been fully explored and that the extent of BMV land affected has been minimised. | The Applicant's consideration of alternatives for site selection and the development of site layout are set out within **Appendix D Site Selection Report of the Planning Statement** [APP-264], the **Design Approach Document** [APP-268] and **ES Chapter 3: Alternatives and Design Evolution** [APP-054].<br><br>In summary, the Applicant has taken into account agricultural land quality when identifying the Order Limits, however, as explained within paragraph 3.3.26 of **Appendix D Site Selection Report of the Planning Statement** [APP-264], however, there is no land of sufficient scale for a 750MW solar farm that is located within proximity to the Weston Marsh Point of Connection which does not have a high likelihood of BMV land, making complete avoidance of BMV agricultural land impossible for the Scheme.<br><br>Subsequently, the development of the Site layout has been informed by agricultural land classification surveys. This can be evidenced from areas of Grade 1 BMV land excluded from physical development within Parcel C and set aside as a habitat management area, where agricultural land use is to be retained. In total, over 69ha of Grade 1 and 2 agricultural land has been excluded from physical development and will be kept in arable use through habitat management areas and managed to provide biodiversity benefits. Other areas of Grade 1 land within the Solar |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | Development Area comprise small pockets of land or narrow slivers which would have limited potential for arable use if left undeveloped within the Scheme layout. Furthermore, excluding further areas would compromise the objective of the Scheme to deliver 750MW of energy capacity. All 132 kV On-Site Substations have been located on Grade 3b (non-BMV) land. However, it has not been possible to avoid the use of Grade 1 and Grade 3a land for the 400kV On-Site Substation and BESS Compound, with detailed consideration of the options set out within paragraphs 3.6.24-3.6.28 and Table 3-6 of **ES Chapter 3: Alternatives and Design Evolution** [APP-054]. |
| Impacts on Fenland Peat Soils | The Council is particularly concerned about potential impacts on the highly productive peat soils that underpin the Fenland landscape. Development on peat soils carries risks including soil degradation, carbon loss, altered hydrology, subsidence and long-term reductions in agricultural productivity. FDC considers that robust evidence is required to demonstrate how peat soils, drainage systems and long-term soil health will be protected throughout the construction, operational and restoration phases of the project. | Peat soils were not identified within the Site as part of the land and soil survey, as can be evidenced from **ES Appendices 5-2 and 5-3** [APP-172 to APP-173].<br>Removing land from cultivation and the maintenance of permanent vegetation cover protects soil from erosion, improves soil structure and improves carbon sequestration. As a result, soil health is anticipated to improve over the operational period of the Scheme, particularly under climate change and extreme weather events.<br>A detailed Soil Management Plan, to be prepared in substantial accordance with the **OSMP Plan** (Doc Ref. 7.14 Rev 1), will specify how soils are to be protected and |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | managed during all phases of the Scheme, including how existing soil drainage will be preserved. |
| Overall Position | Whilst FDC raises no objection on transport or environmental health grounds, it requests that significant weight is given to the protection of BMV agricultural land and peat soils when considering the overall planning balance and determining the application. | The Applicant notes Fenland District Council's overall position and has provided responses on the key issues raised in the rows above. The Applicant is confident that its approach in respect of BMV land is consistent with applicable policy and guidance. |

## 2.5. North Lincolnshire Council

2.5.1. Table 2-5 below sets out the Applicant's response to the issues raised within the Relevant Representation from North Lincolnshire Council [RR-146] including signposting to the relevant sections of the DCO Application.

2.5.2. Where text within the representation summarises the documentation submitted by the Applicant, it has not been reproduced in the table below.

**Table 2-5: North Lincolnshire Council**

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| General | 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 the information submitted with the proposed development not likely to result in any significant impact upon North Lincolnshire. | The Applicant notes this comment, no further response required. |

## 2.6. Peterborough City Council

2.6.1. Table 2-6 below sets out the Applicant's response to the issues raised within the Relevant Representation from Peterborough City Council [RR-156] including signposting to the relevant sections of the DCO Application.

2.6.2. Where text within the representation summarises the documentation submitted by the Applicant, it has not been reproduced in the table below.

**Table 2-6: Peterborough City Council**

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| Traffic and transport | The LHA was previously consulted on Meridian Solar Farm and issued an objection to the proposals in June 2025. The required amendments / information was as follows:<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 | The Applicant notes Peterborough City Council's comments and wishes to clarify that the concerns raised in June 2025 were addressed during the preparation of the DCO Application and are summarised within Table 15-2 of the **ES Chapter 15: Traffic and Access** [APP-066].<br><br>In relation to network peak hours, the Applicant notes that the Peterborough Highway Services Transport Assessment Guidelines (June 2025)[31] does not prescribe a single set of network peak hours. Instead, they require peak hours to be identified through survey data and agreed with the Local Highway Authority, whilst noting that typical Peterborough network peak hours are generally 08:00–09:00 in the AM and 17:00–18:00 in |

[31] Peterborough City Council (2025) *Peterborough Highway Services Transport Assessment Guidelines*. June 2025. Available at: https://www.peterborough.gov.uk/council/planning-and-development/highway-control (Accessed: 29/07/2026).

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | they are above this then further assessments will be required. | the PM. The Guidelines further note that peak hours can vary across the authority area and should be established through observation. This exercise has been undertaken to inform the identification of peak hours, as set out in paragraph 15.6.14 of **ES Chapter 15: Traffic and Access** [APP-066].<br><br>The Scheme is not expected to generate traffic during these Peterborough network peak periods. Construction staff will arrive on site before the AM network peak and depart after the PM network peak, whilst construction deliveries will be scheduled to take place between 09:00 and 17:00. Consequently, Scheme traffic is not expected to interact materially with the Peterborough network peaks. Accordingly, no impacts are anticipated during the periods identified by Peterborough City Council as being most sensitive from a network capacity perspective. Thus, no further capacity assessment is considered to be required.<br><br>With regard to the A47/A16 junction, the junction is located more than 15 km south of the southernmost extent of the Order Limits and was therefore not considered part of the local highway network likely to experience material traffic effects associated with the Scheme. As stated in **ES Chapter 15: Traffic and Access** [APP-066], the Traffic and Access Study Area including scope of traffic surveys was presented and agreed at the |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | Traffic and Access Scoping Meeting held in September 2025, which was attended by Peterborough City Council.<br><br>The Applicant further notes that the Peterborough Highway Services Transport Assessment Guidelines identify an increase of 30 two-way PCU trips in a single peak hour as the threshold above which additional junction assessment should generally be considered. As all Scheme-related traffic will occur outside of the Peterborough network peak periods, no impacts are anticipated that would require additional capacity assessment. This includes the A47/A16 junction and any other junction within the Peterborough administrative area.<br><br>The Applicant therefore considers that the concerns raised by Peterborough City Council at PEIR stage have been appropriately addressed through the agreed assessment methodology and the assessment presented within **ES Chapter 15: Traffic and Access** [APP-066]. |
| Site access | The indicative access points for the Solar Development and Inter-Array Connections Areas would be located outside of the Peterborough City Council (PCC) administrative area and therefore the LHA has no further comments on this matter.<br><br>The indicative access points for the Grid Connection Corridor would be located outside of | Noted, no further response required. |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | the Peterborough City Council (PCC) administrative area and therefore the LHA has no further comments on this matter. | |
| Road Safety Audit | There are no proposed alterations to the existing highway, off-site road improvements, or new layouts intended for LHA adoption within the Peterborough authority area. As such, the LHA has no comments regarding this matter. | Noted, no further response required. |
| Trip Generation / Transport Assessment | The Environmental Statement Chapter 15: Traffic and Access report has scoped in the Construction and Decommissioning Phases. The Operational Phase has been scoped out on the basis of the low level of trips expected to be generated during the scheme's operation. The thresholds for assessment as outlined in ISEP Environmental Assessment of Traffic and Movement (2023) guidance is 30% (Rule 1) and 10% (Rule 2). Paragraph 2.17 of this guidance states that the Rule 1 and 2 thresholds should not be applied to assessments of air quality, noise, road safety, and driver delay and the assessment criteria should be agreed with relevant stakeholders. | The Applicant notes Peterborough City Council's comments regarding the scope of the traffic and transport assessment and the application of local Transport Assessment Guidelines. The scoping out of operational traffic from further assessment in the ES was considered through the EIA Scoping process, and the Planning Inspectorate agreed that this element of the assessment can be scoped out, as can be evidenced from in **ES Appendix 1-2: EIA Scoping Opinion** [APP-167]. |
| Transport Assessment Note | A Transport Assessment Note has been submitted as part of the application and within this it has been stated that no junction modelling has been | All traffic associated with the Scheme during the construction phase will occur outside the network peak hours within the Peterborough City Council |

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| | undertaken. An increase of 30 or more total two-way passenger car unit (PCU) development trips in any single peak hour at any single junction within the Peterborough City Council administrative area is expected to trigger junction capacity assessment, as per the Peterborough Highway Services Transport Assessment Guidelines. | administrative area. Consequently, the Scheme would not be expected to generate traffic impacts during the periods identified by Peterborough City Council as being most sensitive from a network capacity perspective. As such, no impacts are anticipated at the A47/A16 junction or any other junctions within the Peterborough City Council administrative area that would necessitate junction capacity assessment, in accordance with Peterborough Highway Services Transport Assessment Guidelines. |
| A16 / B1443 roundabout (J16) | The A16 / B1443 roundabout (J16) has been flagged as being of medium sensitivity for driver delay because there was no queue data available. This section of the A16 often experiences a rolling queue southbound during the AM network peak period that begins at the A16 / A47 roundabout and extends for a significant distance. It is therefore expected that any significant increase in development traffic in this section should be modelled. | The Applicant notes Peterborough City Council's comments regarding the sensitivity of the A16/B1443 roundabout (J16) and the potential for southbound queuing on the A16 during the Peterborough AM network peak period.<br><br>As acknowledged within the assessment, construction traffic associated with the Scheme will be managed to avoid peak network periods, including the Peterborough network peak hours, through the **OCTMP** [APP-278]. Therefore, the Scheme would not be expected to materially contribute to existing queueing conditions during these times.<br><br>The Applicant further notes that the Peterborough Highway Services Transport Assessment Guidelines identify a threshold of 30 two-way PCU movements in |

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| | | any single peak hour as the general trigger for further junction assessment and that peak hours should be determined through observation and agreement with the Local Highway Authority. The Scheme's construction traffic would occur outside these peak periods and, as such, would not be expected to generate significant increases in traffic during the periods when existing congestion is known to occur.<br><br>**ES Chapter 15: Traffic and Access** [APP-066] assessment concluded that forecast traffic increases on the A16 within the Peterborough administrative area would not result in significant effects, and the collision analysis did not identify an underlying highway safety issue that would be exacerbated by Scheme traffic. The Applicant therefore considers that the decision not to undertake junction capacity modelling at J16 is proportionate to the scale, timing and temporary nature of the forecast traffic impacts. |
| Traffic survey area | It was previously requested for the traffic survey area to include the A47 / A16 junction, and this has not been carried out. Further clarification is sought. | The Applicant notes Peterborough City Council's request for clarification regarding the inclusion of the A47/A16 junction within the traffic survey area.<br><br>The Applicant notes that the traffic and access study area presented in **ES Chapter 15: Traffic and Access** [APP-066] was discussed and agreed at the Traffic and Access Scoping Meeting held in September 2025, which |

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| | | was attended by Peterborough City Council. The assessment scope was therefore established through consultation with the relevant authorities and focused on those links and junctions anticipated to experience material traffic effects as a result of the Scheme.<br><br>Construction traffic has been scheduled to avoid the Peterborough network peak periods and, accordingly, no material impacts are anticipated at the A47/A16 junction during its busiest periods. Furthermore, the Scheme would not be expected to generate traffic increases sufficient to trigger detailed junction assessment in accordance with the Peterborough Highway Services Transport Assessment Guidelines. |
| Future Baseline | The TEMPro 8.1 background growth factors for the period 2024 / 2025 to 2031 outlined within Table 15-19 of the Environmental Statement Chapter 15: Traffic and Access report are for South Holland, and none have been specified for Peterborough. A check has been undertaken to compare Peterborough TEMPro A Road Region growth factors to those derived from TEMPro for South Holland between 2024 and 2031. This check found that Peterborough growth factors were consistently higher for both the AM and PM peak hours. It is therefore advised that Peterborough growth factors | The Applicant notes Peterborough City Council's comments regarding the application of TEMPro growth factors within the future baseline assessment.<br><br>The Applicant acknowledges Peterborough City Council's observation that TEMPro growth factors derived for Peterborough may be higher than those derived for South Holland over the period 2024/2025 to 2031. However, since the purpose of the future baseline assessment is to identify any potentially significant effects arising from the Scheme, it is considered more appropriate for the assessment to be based on lower growth factors, since they produce a lower future |

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| | are applied for the Peterborough sections of the A16. | baseline against which construction traffic associated with the Scheme can be assessed. Applying higher Peterborough-specific growth factors would increase background traffic levels on the network and consequently reduce the relative percentage impact of Scheme traffic.<br><br>As such, the magnitude of traffic and transport effects reported in **ES Chapter 15: Traffic and Access** [APP-066] would be expected to be no greater, and potentially lower in magnitude, than those currently presented. It should be noted that the traffic assessment set out within **ES Chapter 15: Traffic and Access** [APP-066] concluded that impacts on the Peterborough section of the A16 (receptors L34, L35 and J16 located within PCC) would be low and not result in significant traffic and transport effects when the South Holland TEMPro growth factors are applied to the baseline traffic flows.<br><br>The Applicant therefore considers that the growth factors applied are appropriate for the purposes of the assessment and do not materially affect the conclusions of **ES Chapter 15: Traffic and Access** [APP-066]. The application of Peterborough-specific growth factors to the relevant sections of the A16 would not alter the overall conclusion that the Scheme would not result in significant traffic and transport effects on the Peterborough highway network. |

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| Alternative Assumptions within TEMPro 8.1 | It is not clear whether there have been any subsequent adjustments applied using Alternative Assumptions within TEMPro 8.1 to avoid any double counting of relevant committed developments. | The Applicant notes Peterborough City Council's comments regarding the application of TEMPro growth factors and the use of the Alternative Assumptions functionality within TEMPro 8.1. No alternative assumptions have been applied within TEMPro when calculating growth factors since none of the scoped in developments considered in the cumulative assessment include residential or workplace provision. |
| Peterborough-related committed development sites | There appears to have been no consideration of Peterborough-related committed development sites that directly interact with the A16. Relevant Peterborough-related committed development sites would include:<br>• Land East of Newborough Road (23/00483/OUT) (Pending Consideration) – Demolition of existing agricultural buildings and the development of a phased residential development (up to 1,130 dwellings) including green space, access and other associated infrastructure (all matters reserved except access)<br>• Land Off Newborough Road (19/00272/OUT) (Consented) – Outline application for the Erection of up to 870 residential dwellings with access from Newborough Road; provision of a primary school and playing field; a local centre up to 0.25ha with A1/A2/A3/A4/A5/D1 use classes; open space and | The Applicant disagrees that there has been no consideration of Peterborough-related committed development sites that directly interact with the A16.<br><br>Both Land East of Newborough Road (23/00483/OUT) and Land Off Newborough Road (19/00272/OUT) are included in **ES Appendix 15-5: Cumulative Schemes** [APP-252] as part of the long list of developments reviewed and evaluated for the Traffic and Access Assessment. These developments were therefore considered as part of the cumulative effects assessment process.<br><br>As explained in **ES Appendix 15-5: Cumulative Schemes**, both developments were subsequently screened out of the cumulative assessment because they are located more than 5 km from Scheme and are not anticipated to generate a significant number of trips on the local |

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| | landscaping; and other infrastructure and associated works including demolition of all buildings on site, with access secured and all other matters reserved.<br>Both sites above are allocated within the Adopted Peterborough Local Plan under LP 35.6. | highway network affected by the Scheme, with the exception of the A16.<br><br>As presented in Section 15.8 of **ES Chapter 15: Traffic and Access** [APP-066], all traffic impacts on receptors located on the A16 were assessed as negligible. On this basis, the Applicant concluded that the inclusion of these developments within the detailed cumulative assessment would not materially alter the assessment findings or the conclusions regarding the significance of effects.<br><br>The Applicant therefore considers that these developments were appropriately considered during the cumulative assessment screening process and that their exclusion from the detailed cumulative assessment was justified and proportionate. Accordingly, the Applicant remains satisfied that the assessment demonstrates that the Scheme would not result in significant cumulative traffic and transport effects. |
| Construction Phase | The Outline CTMP proposes to minimise HGV movement during certain times of the day, e.g. between 07:00 and 09:00 and 17:00 and 19:00) to avoid increasing traffic levels on the surrounding highway network during peak times. A Delivery Management System and monitoring system to regulate the arrival times of HGVs and monitor HGV routing compliance is also proposed. This is | The Applicant notes Peterborough City Council's support for the proposed construction traffic management measures, including the restriction of HGV movements during peak periods and the use of a Delivery Management System and monitoring regime.<br><br>In relation to HGV and Abnormal Indivisible Load (AIL) routing, the Applicant notes that the HGV and AIL routing plans submitted with the application (**ES Figure** |

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| | welcomed and considered appropriate. However, it is not clear how HGVs and AILs will be routed within the Peterborough area. Further clarification is sought. | **15-3** [APP-161] and **ES Figure 15-4** [APP-162]) do not fully extend through the Peterborough Road Network. The HGV and AIL routing plans currently do not confirm the exact routing between the Site and the SRN. These routes will be secured once the details of the origins of construction equipment and materials are known through the Detailed CTMP to be approved by the relevant local planning authority which must be in accordance with the **OCTMP** [APP-278]. The HGV and AIL construction routes connect the site to the A16, which is on the Major Route Network (MRN). The Applicant has produced a geographically expanded version of Figure 15-3 to show the potential A16 connections to the SRN, which is submitted at Deadline 1 as part of the **Statement of Common Ground with National Highways** (Doc Ref. 8.15).<br>The Applicant therefore considers that sufficient information has been provided at this stage to assess the likely traffic and transport effects of the Scheme and that the detailed routing of HGVs and AILs can appropriately be addressed through the CTMP process, as acknowledged by Peterborough City Council. |
| | A shuttle service is proposed as part of the Outline CTMP to provide transport between local settlements and the scheme for about 55% of construction staff. This is welcomed and considered | The Applicant notes Peterborough City Council's support for the proposed shuttle bus service and the role it will play in reducing construction workforce vehicle trips on the local highway network. |

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| | appropriate. However, as with the above there is no routing shown within the Peterborough area. Further clarification is sought. | At this stage, the precise routing of the shuttle bus service within the Peterborough area has not been defined, as the final contractor arrangements, workforce origins, temporary worker accommodation locations and detailed transport logistics have not yet been established. As a result, it is not currently possible to determine the exact shuttle bus routes that may be required during construction.<br><br>The Applicant has therefore adopted a framework approach through the **OCTMP** [APP-278], with the detailed shuttle bus strategy to be developed prior to construction once the contractor and workforce details are known. This will include details of pick-up and drop-off locations, route selection, service frequencies and operational arrangements. |
| Junction capacity assessment | The core construction working hours would be within weekdays between 07:00 and 19:00 and traffic movements of workers travelling to and from the site would fall between 06:00 and 07:00 (construction AM peak hour) and 19:00 and 20:00 (construction PM peak hour) during a weekday. Core working hours for Saturdays would be 08:00 – 13:30. There will be no Sunday or Bank Holiday working unless crucial to construction. | The Applicant notes Peterborough City Council's comments regarding the identified study area peak hour of 16:00–17:00 and the assertion that the forecast increase of 15 two-way HGV movements (34.5 PCUs) at the A16/B1443 Thorney Road roundabout (J16) would trigger the need for a junction capacity assessment.<br><br>The Applicant notes that the Peterborough Highway Services Transport Assessment Guidelines (June 2025) |

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| | The peak year for construction traffic movements is expected to be 2031 and has therefore been used as the future assessment year. This is considered appropriate for assessment purposes.<br><br>Peterborough typically has network peak hours of 08:00 – 09:00 and 17:00 – 18:00 but this can differ in some areas of Peterborough's network. The Environmental Statement Appendix 15-3 Receptor Traffic Flow Tables shows that there will be no development traffic between 08:00 and 09:00, which is welcomed. A network peak hour for the study area of 16:00 – 17:00 has been identified and during this period, it is expected that the development would generate 15 two-way vehicular flows (34.5 PCUs) at the A16 / B1443 Thorney Road roundabout (J16) and 100% of these will be HGVs. As per the Peterborough Highway Services Transport Assessment Guidelines this would trigger the need for junction capacity assessment. Further clarification is sought. | state[32] that peak hours should be determined through observation and agreed with the Local Highway Authority, whilst noting that typical Peterborough network peak hours are generally 08:00–09:00 and 17:00–18:00. The Guidelines also identify an increase of 30 two-way PCU trips in a single peak hour as the threshold above which further assessment should generally be considered.<br><br>The Applicant notes that the identified traffic increase occurs during the 16:00–17:00 hour, which is outside the typical PM network peak hours identified within the Peterborough Highway Services Transport Assessment Guidelines. Furthermore, the Scheme has been designed such that construction staff arrive before the AM network peak and depart after the PM network peak, whilst construction deliveries are managed throughout the working day to minimise interaction with peak network conditions. It should be noted that construction deliveries have been assessed based on the peak of the construction phase which highlights the worst-case scenario which will also be only temporary in nature for a short phase of the construction phase. |

[32] Peterborough City Council (2025) *Peterborough Highway Services Transport Assessment Guidelines*. June 2025. Available at: https://www.peterborough.gov.uk/council/planning-and-development/highway-control (Accessed: 29/07/2026).

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| | | The Applicant also notes that the calculation of 34.5 PCUs is based on the application of a local HGV conversion factor of 2.3 PCUs per HGV. However, the Department for Transport's guidance[33] identifies that, in standard highway assignment modelling, an HGV is typically represented by a factor of 2.0 PCUs. This approach is commonly applied on rural and local road networks and is considered appropriate in the context of the A16. On this basis, the forecast 15 two-way HGV movements would actually equate to 30 PCUs, placing the forecast impact at PCC's assessment threshold rather than materially exceeding it. The Applicant therefore considers that the forecast traffic increase should be viewed as being at, rather than above, the threshold identified within the Peterborough Highway Services Transport Assessment Guidelines.<br><br>Notwithstanding this, the Applicant considers that the threshold identified within the Peterborough Highway Services Transport Assessment Guidelines should be applied proportionately and in the context of the overall assessment. The forecast increase comprises a relatively small number of HGV movements (between 7 to 8 HGVs |

[33] Department for Transport (2026) *TAG Unit M3.1: Highway Assignment Modelling*. London: Department for Transport. Available at: https://www.gov.uk/government/publications/tag-unit-m3-1-highway-assignment-modelling (Accessed: 29 July 2026).

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| | | per hour in each direction, equivalent to approximately one additional HGV on the road every 4 minutes, outside of the network peak hour) on an MRN route that already accommodates HGV traffic, and the environmental assessment presented in **ES Chapter 15: Traffic and Access** [APP-066] concluded that traffic impacts on the A16 receptors within the Peterborough administrative area, including receptor J16, would be negligible.<br><br>The Applicant therefore considers that the assessment presented within ES Chapter 15**: Traffic and Access** [APP-066] is proportionate to the scale and nature of the predicted traffic impacts and that the conclusions of the Traffic and Access assessment remain robust. |
| | As stated previously, there has been no consideration of the A47 / A16 junction and the expected development traffic increase at this junction should be considered. Further clarification is sought. | The Applicant respectfully disagrees that additional assessment of the A47/A16 junction is required. As set out in **ES Chapter 15: Traffic and Access** [APP-066], the Traffic and Access Study Area was presented and agreed at the Traffic and Access Scoping Meeting held in September 2025, which was attended by PCC. The A47/A16 junction was not included within the agreed study area since it is located more than 15 km south of the southernmost extent of the Order Limits and is not considered part of the local highway network likely to experience material traffic effects as a result of the Scheme. |

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| | | Furthermore, all Scheme-related construction traffic has been forecast to occur outside of the Peterborough network peak periods. Construction workers are expected to arrive before the AM network peak and depart after the PM network peak, whilst HGV deliveries are anticipated to occur between 09:00 and 17:00. Consequently, the Scheme is not expected to materially interact with the periods during which the A47/A16 junction experiences its highest traffic demand.<br><br>In addition, the assessment concluded that the traffic impact of the Scheme on the A16 corridor would be negligible. Consequently, there is no reasonable basis to conclude that the A47/A16 junction would experience significant traffic or transport effects attributable to the Scheme.<br><br>The Applicant therefore considers that the agreed study area extent remains appropriate and proportionate, and that sufficient information has been provided to demonstrate that the Scheme would not result in significant traffic and transport effects at the A47/A16 junction. |
| Trip distribution methodology | The trip distribution methodology applied for private vehicles and LGVs is considered appropriate. The assumed trip distribution methodology for HGVs is considered appropriate. | The Applicant notes Peterborough City Council's agreement that the trip distribution methodologies adopted for private vehicles, LGVs and HGVs are appropriate. |

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| | There are no planned temporary road or lane closures for roads within Peterborough specified. | The Applicant also notes that no temporary road or lane closures are currently proposed within the Peterborough administrative area. Should any temporary traffic management measures be identified as necessary during the detailed design or construction planning process, these would be developed in consultation with the relevant highway authorities and secured through the Detailed CTMP prior to implementation. |
| Travel Plan | No Travel Plan has been produced to demonstrate how a 55% shuttle bus mode share for construction staff will be achieved. Without this, there is concern there could be an underestimation of the likely vehicular trips on links and junctions within the Peterborough area. Further clarification is sought. | The Applicant acknowledges Peterborough City Council's comments regarding the assumption that 55% of construction workers would travel to the Site via shuttle bus and the absence of a detailed Travel Plan at this stage.<br><br>The Construction Worker Travel Plan is currently incorporated in the **OCTMP** [APP-278], and will be secured through the Detailed CTMP process as per Requirement 15 of the **Draft DCO** (Doc Ref. 3.1 Rev 2), and developed prior to the commencement of construction.<br><br>The shuttle bus mode share reflects the Applicant's commitment to providing dedicated worker transport as part of the construction traffic management strategy and is supported by the inclusion of measures within the **OCTMP** [APP-278], including worker transport management and travel demand management measures. |

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| | | The details of the shuttle bus routes will be dependent on the workplace locations of the construction workforce, including any non-home based staff. A detailed shuttle bus strategy will be developed prior to construction when this information is known by the contractor.<br><br>Furthermore, the traffic assessment has adopted a robust approach by assessing peak construction traffic demands and identifying mitigation measures through the **OCTMP** [APP-278] framework. Construction traffic will be managed through the Delivery Management System, workforce transport measures and routing controls secured through the CTMP process. |
| Operational Phase | It is expected that the scheme will attract approximately 11 vehicle arrivals and 11 vehicle departures per day (22 two-way total daily vehicular movements). Staff vehicles and those used for maintenance will primarily be four-wheel drive vehicles and vans, with HGVs rarely accessing the site.<br><br>During the 40-year operational life of the scheme, site-wide replacement of equipment may be required. The vehicles generated during the peak construction phase for the replacement have been | The Applicant notes Peterborough City Council's comments regarding operational phase traffic and agrees that the volume of traffic generated during the routine operation of the Scheme would be low and would not be expected to result in significant effects on the local highway network.<br><br>The Applicant therefore considers that the conclusions presented within **ES Chapter 15: Traffic and Access** [APP-066] remain robust and that the operational phase would not give rise to significant traffic and transport effects. |

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| | estimated at 20% of total vehicle movements during the Construction Phase.<br><br>It is not expected that the traffic movements associated with the operational phase will have a significant or severe impact on the local highway network in Peterborough. | |
| Decommissioning Phase | The scheme would be decommissioned in 2073 following a 40-year operational phase. It is accepted that this is too far into the future to accurately predict traffic flows and impacts at junctions. Basing the likely impacts of the decommissioning phase on the construction phase impacts is considered robust.<br><br>The Outline Decommissioning Environmental Plan (DEMP) states that a Decommissioning Traffic Management Plan (DTMP) will be developed prior to decommissioning in consultation with the LPAs and this will also include a Decommissioning Worker Travel Plan (DWTP). The mitigation measures identified for transport and access within the DEMP will use the measures detailed within the Outline CTMP as a starting point and this is considered appropriate. | The Applicant welcomes Peterborough City Council's confirmation that the approach adopted to assess the decommissioning phase is appropriate and robust.<br><br>The Applicant agrees that, given decommissioning is anticipated to occur following a 40-year operational period, it is not possible to reliably forecast background traffic conditions, travel behaviour and network performance at that time. Accordingly, the assessment has adopted a reasonable worst-case approach by assuming that decommissioning activities would generate effects comparable to, or lower than, those assessed for the construction phase.<br><br>Moreover, the Applicant considers that adequate mechanisms will be in place in the form of DEMP, DTMP and DWTP, as secured through the **ODEMP** (Doc Ref. 7.12 Rev 1), to ensure that the transport effects of decommissioning can be appropriately managed and assessed at the relevant time, taking account of the |

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| | | prevailing highway conditions, applicable guidance and stakeholder requirements at that stage. |
| Personal Injury Collision Analysis | The only junction assessed within the Peterborough administrative boundary is the A16 / B1443 roundabout. The A16 links associated with this junction have also been considered.<br><br>Table 15-25 of the Environmental Statement Chapter 15: Traffic and Access Report shows that there were 15 total collisions (2 of which were serious and 2 fatal) on the A16 section north of the A16 / B1443 roundabout (L34) and 13 total collisions (4 serious and 4 fatal) on the A16 section south of the A16 / B1443 roundabout (L35). Of the fatal accidents at L34, one involved an HGV. Of the fatal accidents at L35, one involved an HGV. Further investigation has been undertaken within the Transport Assessment Note, and this identified causation factors, such as failing to look properly when turning, driver distraction, and overturning in high winds. While contributory factors indicate 'failing to look properly', a repeated occurrence of this factor can suggest a potential issue with junction visibility and / or gap acceptance. Driver distraction could simply be gross negligence in some instances but in other instances it can be influenced by external distractions such as signage, | The Applicant notes Peterborough City Council's review of the Personal Injury Collision (PIC) analysis and the further commentary provided in relation to collision causation factors on the A16 north and south of the A16/B1443 roundabout.<br><br>The Applicant undertook a detailed review of the available collision records, including contributory factors, to determine whether there was evidence of a recurring highway safety issue that could be materially affected by Scheme traffic.<br><br>The Applicant acknowledges that contributory factors such as 'failing to look properly' can arise for a variety of reasons and that, in some circumstances, repeated occurrences may warrant further consideration of local highway characteristics. However, the review of the collision data did not identify a clear pattern indicating that collisions were attributable to a specific geometric, visibility or operational deficiency on the network that would be exacerbated by the Scheme.<br><br>Consequently, the Applicant agrees with Peterborough City Council's conclusion that the forecast increase in traffic on the Peterborough sections of the A16 is unlikely to result in collision rates exceeding national |

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| | complex lane arrangements, multiple decision points, congested conditions, etc.<br><br>The applicant has compared the local collision rate for L34 and L35 to the national average collision rate and this shows that the local collision rates are below the national average. It is therefore expected that an increase in traffic volumes along the Peterborough sections of the A16 will unlikely result in an accident record greater than the national average for A roads. | average levels or give rise to any significant effects on highway safety.<br><br>The Applicant therefore considers that the road safety assessment presented within the **Transport Assessment Note** [APP-251] is robust and appropriate in its conclusion that the Scheme would not result in any significant adverse effects on road safety across the transport study area. |

# 3. Applicant's Response to Statutory Consultees

## 3.1. Overview

3.1.1. The tables below set out the responses to the Relevant Representations from statutory consultees and the response from the Applicant.

3.1.2. Where text within the representations summarises the documentation submitted by the Applicant, it has not been reproduced in the tables below.

## 3.2. Anglian Water Services

3.2.1. Table 3-2 below sets out the Applicant's response to the issues raised within the Relevant Representation from Anglian Water Services [RR-010] including signposting to the relevant sections of the DCO Application.

**Table 3-2: Anglian Water Services**

| Topic | Matter Raised | Applicant's Response |
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| Engagement | AW has engaged with Meridian Solar Ltd (the Applicant) throughout the pre-application period including written comments to the Scoping Consultation, formal Statutory Consultation, and Targeted Consultation, on the proposed Development Consent Order (DCO) application and the Preliminary Environmental Information Report (PEIR). AW have also supplied our Bespoke Protective Provisions (BPP) for inclusion in the draft DCO. However, it has been disappointing that there has been no engagement with AW regarding the BPP's nor any other issues that have been raised in previous consultations. | The Applicant has engaged with Anglian Water and agreed bespoke protective provisions which will be incorporated into the **Draft DCO** (Doc Ref. 3.1 Rev 2) to be submitted at Deadline 1. |

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| Protective Provisions | A copy of AW's Bespoke Protective Provisions (BPP's) was supplied to the applicant and their legal representatives through the pre-application period to ensure that the necessary protections and measures are undertaken in discussion with AW when the scheme moves forward to delivery. AW would welcome further discussions regarding these as they have not been included in the draft DCO under 'Schedule 14 Protective Provisions' (application document APP-028) which is disappointing. We acknowledged the inclusion of standard provisions that seek to protect water utilities; however, AW is obliged at this stage to OBJECT to the inclusion of the "standard" set of protective provisions for the benefit of statutory undertakers contained within the draft DCO. AW considers these to fall short of providing it with the necessary protections. | The Applicant notes Anglian Water's comments regarding the protective provisions. The Applicant has engaged with Anglian Water and agreed bespoke protective provisions which will be incorporated into the **Draft DCO** (Doc Ref. 3.1 Rev 2) to be submitted at Deadline 1. |
| | It is noted in the 'Potential main issues for examination' (APP-286) it summarises the main residual issues with key stakeholders remaining at the time of the DCO Application's submission. Several key stakeholders, which will inform future Statements of Common Ground's (SoCG), have been named. It is disappointing that AW are not included and there has been no engagement around this. If no connections or interfaces with our assets are identified or specific arrangements | The Applicant has engaged with Anglian Water and agreed bespoke protective provisions which will be incorporated into the **Draft DCO** (Doc Ref. 3.1 Rev 2) to be submitted at Deadline 1. The Applicant has entered into a SoCG with Anglian Water which is submitted at Deadline 1. |

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| | are needed to be put in place, then it would be helpful to log this in an SOCG making the examination process more efficient. | |
| Interfaces between the Scheme and AW assets (underground and surface assets) | AW has reviewed the Book of Reference (APP-034) and the associated documents and have identified the need to include the following easements, • Plot A3/28 – Deed of Grant dated 18th October 1945 with rights reserved benefitting Rural District Council of Spalding (AW's predecessors) • Plot B4-56 - Deed of Grant dated 22nd December 1959 with rights reserved benefitting Rural District Council of Spalding (AW's predecessors) The documents will therefore need to be updated to accurately reflect the correct position for these plots. For further LiQ enquiries relating to AW's above ground assets and formal easements, the Applicant should contact our estates team on: AWestates@savills.com | The Applicant has reached out to AW to clarify matters regarding their interest within the scheme. The Applicant has reached out to AW to provide the relevant deeds, conveyance or transfers that support the inclusion of AW into Plot A3-28 and B4-56. A3-28 is unregistered and therefore the Applicant would require evidence to support the inclusion of AW into A3-28 in respect of a Deed of Grant dated 18th October 1945. The current HM Land Registry title that covers plot B4-56 is LL390150, this title does not reference any Deed of Grant dated 22nd December 1959 nor is this information available on the HM Land Registry website. The Applicant is therefore keen to work with AW to accurately reflect its interest within the scheme following the provision of evidence for this interest. |
| Interfaces Between the Scheme and AW Assets (Underground And Surface Assets) | AW owns and operates the water supply and sewerage infrastructure within the scheme Order Limits. There are significant existing AW assets with numerous buried mains water pipes, sewers etc. located within/ adjacent to the public highway which serve the local villages including: Cowbit, Crowland, Moulton Chapel, Whaplode Drove, Shepeau Stow, Holbeach Drove, Moulton Eaugate and Weston. In locations where the scheme intersects with these assets, measures will need | The Applicant has engaged with Anglian Water and agreed bespoke protective provisions which will be incorporated into the **Draft DCO** (Doc Ref. 3.1 Rev 2) to be submitted at Deadline 1.<br><br>Any interactions with assets, both above and below ground, will be discussed with Anglian Water as the Scheme progresses and throughout the detailed design and construction phase to determine a suitable design and/or |

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| | to be in place to ensure their protection and operational continuity of water and sewerage services to customers, including BPPs referenced above. Maps of AW's assets are available to view at: http://www.digdat.co.uk The design of the scheme should minimise interaction with AW assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions. This may include the need for the panels to be positioned in such a way to avoid underground assets, as they may not be able to be diverted in all situations. Through previous consultation stages, AW has identified some notable assets within or in the vicinity of the order limits. 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. 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. Chapter 2: The Scheme (APP-053), paragraphs 2.2.42 and 2.2.44 recognises several other utilities intersect with the site and the scheme has the potential to impact on these utilities. This is dealt with in terms of major accidents and disasters in Chapter 16: Other Environmental | mitigation solution that works for both parties, for example, protection plates over top of existing assets. Within the Solar Development Area, concrete footings for solar panels could be used. Within the Grid Connection Route, pylon positions have been designed with a minimum of 30m stand-off from the pylon centre to Anglian Water assets, which exceeds the stand-off parameters provided by Anglian Water.<br><br>During the construction, any interactions with assets close to or with public highways during the construction and decommissioning of temporary bellmouths and haul roads will be protected. The Applicant will continue to work with Anglian Water to agree suitable protection approaches for the assets involved.<br><br>Between 4SV15 to 4SV16, existing sewage assets will be crossed by a short section of 400kV underground cabling between which is required to pass beneath the existing National Grid Electricity Distribution (NGED) 132kV OHL that routes east to west. The Applicant will continue to work with Anglian Water towards finding a suitable solution and discuss the crossing technologies available for the pipelines and access roads throughout the process and into detailed design and the construction phase. |

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| | Topics (APP-067). It is however noted within Table 16-11 Major Accidents and Disasters Short-Listed for Consideration reference is made to the inclusion of Protective Provisions for the protection of utilities and the mitigation proposed during operation through Management plans. Both of which are discussed in their respective sections within this relevant representation. Where there are interfaces with our assets, we will require the BPPs for AW to be included in the dDCO and would ask that the following indicative stand-off distances are applied (as indicated in our template supplied). (a) 4 metres where the diameter of the pipe is less than 250 millimetres. (b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and (c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres. | |
| Clash detection | AW has sought to engage with the Applicant to carry out a clash detection and technical assurance review of the scheme to confirm, for example, any sensitive plant, open cut locations, access works, diversions any above ground plant and shared access locations. Given the substantial number of other AW projects being delivered in this Asset Management Period AMP8 (2025-2030), there is a strong advantage to having | The Applicant welcomes engagement with Anglian Water and appreciates the value of understanding the interactions with their assets. The Scheme has identified Anglian Water infrastructure through carrying out a utilities search and have sought to avoid and minimise impacts through careful design.<br><br>The Applicant held a meeting with Anglian Water on 8 September 2026 and has another meeting scheduled for |

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| | upfront discussions with AW in relation to our asset interfaces with the scheme. This opportunity has not been taken up by the scheme. We strongly recommend that this assessment be undertaken at the earliest opportunity. This ensures clarity, reduces risk, and supports the timely and efficient delivery of the scheme. Any review of utilities plans used to inform detailed design prior to construction should be in accordance with the PPs for Anglian Water.<br><br>Further discussion is required between AW and the Applicant to confirm these aspects, for example, trenchless crossings and horizontal drilling, ducting, open cut locations, access works, likely diversions, any above ground plant, and shared access locations. These matters should be addressed in supporting documents and will need to be amended accordingly as these matters are agreed. | the 28 September 2026. The Applicant will continue to collaborate with Anglian Water to review any interactions with their assets and agree suitable mitigation works at the detailed design stage in accordance with the protective provisions. |
| Other Environmental Matters – Water Resources | The scheme is within the Lincolnshire Bourne Water Resource Zone (WRZ). Our WRZ summaries explain that the baseline supply demand balance for these WRZs are expected to go into deficit by 2025 under Dry Year Annual Average conditions. AW previous consultation responses encouraged a Water Resources Assessment (WRA) to form an integral part of the Environmental Statement (ES) Chapter on Hydrology and Flood Risk, sufficient to enable regulators including | The Applicant considers that the information relevant to the water resource assessment has already been provided within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1), Section 11.4 under 'Water Supply and Water Resources'.<br><br>The Scheme is not proposing connection to the mains water supply for construction or decommissioning. During operation, mains supply is only proposed for the |

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| | the Environment Agency to advise the Examining Authority and the Secretary of State that the supply of water to the scheme is deliverable and sustainable. AW is disappointed at the lack of WRA included within the ES as this would have clearly included daily demand for each stage of the scheme and whether this is for domestic or non-domestic uses. Notwithstanding the above, Chapter 11: Hydrology and Flood Risk (APP-062), provides information on the water supply and water resources in section 11.4 which also recognises previous responses from AW regarding water scarcity. Paragraph 11.4.31 acknowledges that the scheme sits within a 'seriously water stressed' area set out in the Environment Agency's 'Water stressed areas – final classification 2021 (July 2021)' and details consideration has been given to AW's Water Resources Management Plan (WRMP). Water Supply and Demand AWS works to support the construction and operation of nationally significant infrastructure projects (NSIPs) that are conducted in accordance with the Water Industry Act 1991. In view of the guidance in the National Policy Statements e.g. Overarching National Policy Statement for Energy (EN-1) (December 2025) and (EN-3) (January 2026) and 2024 IAQM guidance 15. AWS would have expected the following points to have been addressed within the ES to set out how the project will be supplied with water and its wastewater managed; and how | operational water supply of site offices within the On-Site Substations, accommodating up to 10 site staff. This would equate to mains water supply requirement of 0.9$m^3$ / day, which is below the threshold at which Anglian Water requires the submission of Water Resource Assessment, as per the relevant representation comments presented herein.<br><br>All other construction, operational and decommissioning water supply is to be sourced from commercial suppliers and a connection to a mains supply does not form part of this DCO Application. If following detailed design post-DCO consent, the water supply options are re-evaluated and connection to Anglian Water supply is sought, relevant assessments and consents would be applied at that time. However, these proposals do not form part of this DCO Application.<br><br>Notwithstanding the above, and following the ISH1 on the 9th September, the Applicant has agreed to prepare a standalone Water Supply Strategy for Deadline 2. A meeting has been scheduled with Anglian Water and the Environment Agency to discuss the format and contents of the assessment ahead of the deadline. |

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| | design has been altered to reduce the need for new infrastructure or the diversion of existing assets, relevant to the construction, operation and de-commissioning stages of the scheme. | |
| Protection of water recycling and supply assets | How water recycling and supply assets serving residents and business in the area will be protected | The Applicant has engaged with Anglian Water and agreed bespoke protective provisions which will be incorporated into the **Draft DCO** (Doc Ref. 3.1 Rev 2) to be submitted at Deadline 1. These Protective provisions set out the mechanism for the protection of existing Anglian Water assets with regards to impacts from the Scheme during construction, operation and decommissioning. |
| Consideration of AW assets in design | How design has been altered to reduce the need for new infrastructure or the diversion of existing assets, relevant to the construction, operation and de-commissioning stages of the scheme. | Pylon positions have been designed with a minimum of 30m stand-off from the pylon centre to Anglian Water assets, which exceeds the stand-off parameters provided by Anglian Water. The Scheme has identified Anglian Water infrastructure through carrying out a utilities search and have sought to avoid and minimise impacts through careful design.<br><br>Any interactions with assets, both above and below ground, will be discussed with Anglian Water as the Scheme progresses and throughout the detailed design and construction phase to determine a suitable design and/or mitigation solution that works for both parties, for example, protection plates over top of existing assets. During the construction of the OHL, any interactions with assets close |

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| | | to or with public highways during the construction and decommissioning of temporary bellmouths and haul roads will be protected.<br><br>Between 4SV15 to 4SV16, existing sewage assets will be crossed by a short section of 400kV underground cabling between which is required to pass beneath the existing National Grid Electricity Distribution (NGED) 132kV OHL that routes east to west.<br><br>The Applicant will continue to work with Anglian Water regarding interactions with their assets to agree appropriate mitigation measures. For the pipeline crossings with the proposed 400kV UGC, examples of crossing techniques can be seen in the Volume 2 Plans 2.8 Indicative Layout Plans and Sections Sheets 8 and 9 for the Illustrative Underground Cable Cross Sections.<br><br>No diversions of existing Anglian Water assets are envisaged.<br><br>During construction, the provision for water supply will be from commercial sources, such as commercial water delivered by tanker. 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), avoiding the construction of new water connections and minimising the impact on local water supplies. During the operational period, only a relatively |

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| | | small supply is needed from mains water to support approximately 10 site staff, which is considered would have a negligible impact on water supply.<br><br>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), avoiding the construction of new water connections. During the operational period, only a relatively small supply is needed from mains water to support approximately 10 site staff, which is considered would have a negligible impact on water supply.<br><br>No connection to the public sewer is proposed for foul sewage across the lifetime of the Scheme, avoiding the need for new foul connections. The foul water flows will be dealt with via a sealed cesspit with no overflow to ground pipe system.<br><br>Where reasonably practicable, the illustrative design for the Scheme has applied offsets from existing utilities, including Anglian Water assets. The Applicant has engaged with Anglian Water and agreed bespoke protective provisions which will be incorporated into the **Draft DCO** (Doc Ref. 3.1 Rev 2) to be submitted at Deadline 1. These include the requirement for detailed design and safe working practices to be agreed with Anglian Water prior to construction. |

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| Potable supply options | The availability of water resources for all phases of the scheme was a previous concern raised by AW in our statutory consultation response. This raised the matter of water resources and the quantities of water that might be required through the construction and operation phases of the scheme. Chapter 11: Hydrology and Flood Risk (APP-062) paragraph 11.4.32 to 11.4.34 details during construction, water will be required on a temporary basis, primarily for activities such as concrete production and curing, and internal road works. The applicant anticipates most of the concrete required will be sourced from existing off-site batching plants and delivered ready-mixed, meaning no new plant infrastructure is needed for the Scheme. However, paragraph 11.4.32 does indicate there will be some requirements for water in relation to concrete within the red line boundary. Further clarity is required around water supply for this requirement. | **ES Chapter 11 Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1), paragraph 11.4.32 has been amended to delete the reference to concrete production. Water would only be required for potential concrete curing if necessary. There will be no concrete batching taking place on site. However, as previously referenced, 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) post DCO consent, as set out within paragraphs 11.4.32 to 11.4.34 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). |
| Construction water demand | AW understands that the additional water demand that will arise from construction operations and workforce needs, is estimated at 90 litres per person per day for up to 855 workers at peak, on a temporary short-term basis. It is understood the scheme expects this water to be supplied via tankered deliveries to temporary on-site storage for welfare facilities, with no permanent mains connection (unless agreed with Anglian Water). During | The Scheme is not proposing connection to the mains water supply for construction or decommissioning. During operation, mains supply is only proposed for the operational water supply of site offices within the On-Site Substations, accommodating up to 10 site staff. This would equate to mains water supply requirement of 0.9$m^3$/ day, which is below the threshold at which Anglian Water requires the submission of Water Resource Assessment, as |

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| | operation, it is noted, the scheme will require annual cleaning of solar panels using clean, chemical-free water at a rate of 3 $m^3$ per 1,000 panels, totalling approximately 3,386 $m^3$ per year, sourced from third-party local suppliers to avoid pressure on local resources. Water for on-site substation offices will be either tankered or supplied via mains, serving up to 10 staff with an estimated demand of 0.9 $m^3$ per day (based on 90 litres per person). No local water abstraction is proposed. Anglian Water will be consulted on a mains connection post-consent, with tanked alternatives if necessary. AW support the use of tankering in water supply at all stages of the scheme and use of storage facilities, although it is probable the water will still be from a AW supply. This supports AW's adopted 'Non-Domestic Water Requests Policy' which states that all requests over 20m3/day of non-domestic water will be declined. However, for Nationally Significant Infrastructure Projects that are requesting over 20m3/day of non-domestic water (e.g. for construction processes) for a scheme, a Water Resource Assessment (WRA) must be completed. This is so we can better understand water demands, water efficiency measures and more effectively forecast water supply requirements so that they do not compromise our ability to supply domestic water to households and | per the relevant representation comments presented herein.<br><br>All other construction, operational and decommissioning water supply is to be sourced from commercial suppliers and a connection to mains supply does not form part of this DCO Application. If following detailed design post-DCO consent, the water supply options are re-evaluated and connection to Anglian Water supply is sought, relevant assessments and consents would be applied at that time. However, these proposals do not form part of this DCO Application.<br><br>Notwithstanding the above, and following the ISH1 on the 9th September, the Applicant has agreed to prepare a standalone Water Supply Strategy for Deadline 2. A meeting has been scheduled with Anglian Water and the Environment Agency to discuss the format and contents of the assessment ahead of the deadline. |

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| | businesses. Our non-domestic water requests position statement can be found here.<br><br>AW notes the source of operational water demand will not be determined until after consent is secured, particularly regarding whether supply will be via tankers or the mains network. AW objects to this approach, as it prevents an assessment of whether a sustainable water supply can be provided to support the scheme. If non-domestic water supply is not agreed within the examination period, Anglian Water would request the draft DCO includes a requirement for a water resources assessment to be submitted to the LPA in consultation with the Environment Agency and relevant water company before construction progresses. | |
| Other Environmental Matters – Non-Potable Water Supply Options | Previous AW responses encouraged the use of rainwater harvesting to serve any non-potable water requirements. This has been addressed briefly within Chapter 11: Hydrology and Flood Risk (APP-062), paragraph 11.8.36 which details the buildings within the substations will be investigated for the viability of rainwater harvesting during detailed design stage. AW is disappointed that little attention has been given to rainwater harvesting at this stage of the application. Paragraph 5.2.14 of the Outline drainage strategy proposes to utilise surface water bodies to discharge run off and fails to identify opportunities for water | The Applicant has considered the potential for rainwater harvesting as part of the drainage strategy. However, given the nature of the Scheme, opportunities for water reuse are extremely limited. The operational solar farm and BESS have negligible ongoing non-potable water demand, with only a small operational compound and substation buildings requiring occasional water use. As a result, harvested rainwater would not likely be regularly utilised, meaning storage tanks would likely remain at or near capacity and provide little effective reduction in runoff during storm events. Similarly, any water storage tanks for BESS are expected to be filled infrequently and would not result in |

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| | storage and reuse. It is recommended the final Drainage strategy seeks to utilise rainwater harvesting systems that align with the management of surface water on site. | ongoing non-potable water demand that would benefit from rainwater harvesting.<br><br>**ES Appendix 11-4: Outline Drainage Strategy** [APP-227 to APP-232] has, therefore, been developed using conservative design assumptions, with attenuation storage sized without taking credit for rainwater harvesting or other reuse measures. This approach provides a robust and reliable means of managing surface water while avoiding the introduction of mechanical infrastructure that would offer minimal environmental or hydraulic benefit and increase long-term maintenance requirements.<br><br>Consequently, it is not considered that rainwater harvesting would represent a proportionate or effective SuDS measure for the Scheme. However, The **OOEMP** (Doc Ref. 7.11 Rev 1) has been updated to include a commitment to investigate potential opportunities for rainwater harvesting at the detailed design stage post DCO consent, when building layouts are known and rainwater collection systems can be assessed for viability. |
| Other Environmental Matters – Fire Water | Chapter 11: Hydrology and Flood Risk (APP-062) – Table 11-2 (p.25), which summarises key matters raised by prescribed or statutory consultees in relation to the water environment, references earlier comments from AW seeking clarification on firefighting water requirements. The applicant has responded to this, | Connection to mains water supply for the provision of water for firefighting water storage tanks does not form part of this DCO Application. Instead, it is proposed that water is brought in by commercial suppliers. If following detailed design post-DCO consent, the water supply options are re-evaluated and connection to Anglian Water |

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| | explaining firefighting water would represent a one-off demand rather than a continuous supply requirement, with replenishment only necessary in the event of use during an emergency. Should water for the firefighting storage tanks be sourced from the mains network, a formal water supply application would be submitted to Anglian Water, supported by a Water Resource Assessment. This requirement will not be confirmed until the detailed design stage however further information will be developed through the Outline Battery Safety Management Plan (OBSMP) and Emergency Response Plan (ERP), to be prepared post-DCO consent in accordance with the OBSMP. In terms of Potable and Fire Water for the scheme there are several questions that are left unanswered in terms of the requirement and source. This leaves AW in the position that we are unable to accurately assess if we can provide sufficient and sustainable water for the scheme's construction and operation. AW encourages the Applicant to complete a WRA at the earliest opportunity to more accurately assess water supply in terms of Potable and Non potable requirements and how this can be managed through rainwater harvesting and sourcing of potable water. We also encourage the applicant to use our pre planning enquiry service via the customer portal to ensure the scheme's water supply requirements can be accurately assessed, including | supply is sought, relevant assessments and consents would be applied at that time. However, these proposals do not form part of this DCO Application. |

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| | whether any network reinforcement is needed to support domestic water provision at the substations. We also recommend contacting planningliaison@anglianwater.co.uk to discuss both water supply and wastewater connection requirements. The team can guide you through the InFlow registration process (InFlow \| Development Services), and the need to submit a pre planning enquiry. | |
| Other Environmental Matters – Flood Risk Assessment, Surface Water and Wastewater Flood Risk Assessment (FRA) | AW previous consultation response welcomed the inclusion of an FRA and surface water drainage strategy and included that we consider Sustainable Drainage Systems (SuDS) and rainwater harvesting should be used to serve non potable water requirements. Clarification was required on how consequent impacts on the local drainage/ sewerage network will be designed as part of the Scheme for both construction and operational stages; and sought to ensure no right to connect powers were included within the draft DCO on a temporary or permanent basis. The FRA (APP-222) and Outline Drainage Strategy (APP-227) should consider any increased risk of surface water and groundwater flood risks arising from the scheme that could exacerbate sewer flooding risks due to infiltration/ingress to our networks. The likelihood of more extreme weather events leading to higher-than- | **ES Appendix 11-4: Outline Drainage Strategy** [APP-227] proposes to mimic existing site conditions for surface water drainage, as far as reasonably practicable. Drainage systems would discharge surface water runoff to existing watercourses at greenfield runoff rates, taking into account future climate change, or to ground, where there is no watercourse present and where existing conditions discharge to ground.<br><br>With regards to foul drainage, paragraphs 5.9.1 and 5.9.2 of **ES Appendix 11-4: Outline Drainage Strategy** [APP-227] confirm there are no public sewers within 30m of the On-Site Substation Compound locations and foul flows will be directed to a sealed cesspit, with no public sewer connection proposed. As existing conditions are to be mimicked and with no discharge of surface water to sewers, there is no increased risk of failure of public sewer |

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| | average rainfall and cumulative impacts of storm events, as recently experienced during Winter 2023/24, mean that infrastructure becomes increasingly vulnerable to flood risk. The scheme should aim to minimise any flood risks as far as possible by designing in measures to limit increased flood risks to utilities infrastructure. | infrastructure as a result of the Scheme from the proposed outline drainage strategy.<br><br>Same principles will also apply during construction with regards to the discharge of surface water runoff from temporary drainage systems and the use of sealed cesspit for foul water. These requirements are set out within the **OCEMP** (Doc Ref. 7.10 Rev 2). |
| Foul water | The FRA (APP-222) considers a range of potential flood risks, including those from rivers and watercourses, surface water, groundwater, and sewer systems. AW notes that climate change has been appropriately incorporated into the assessment in accordance with current guidance. AW notes paragraphs 4.3.14 and 5.9.7, which assesses the risk of sewer flooding and confirms that no sewers are located within 30 metres of the on-site substations and there is no foreseen interaction with existing sewer infrastructure. However, AW has identified a rising main (sewer under pressure) that has the potential to interact with the project to the northwest of Moulton Chapel, and the west of Weston. More information can be made available through the clash detection process.<br><br>Paragraph 5.9.1 further explains that, once the Solar Development Area is operational, foul drainage will only be required for the staffed control buildings within the | The Applicant notes the positive comments.<br><br>Regarding the identified sewer rising main near Moulton Chapel and Weston; this area is outside of the Solar Development Area (SDA) where the majority of construction will take place. The positioning of pylons has been designed to include a minimum of 30m distance stand-off from Anglian Water assets to pylon centres. There is an interaction between the underground cabling section at the NGED 132kV OHL undergrounded section of the Grid Connection Route, north-west of Moulton Chapel. The Applicant will continue to collaborate with Anglian Water to understand the required depth separation between assets and review crossing technologies available.<br><br>Prior to construction, all required procedures would be followed in accordance with Protective Provisions to detect and avoid below ground infrastructure, including liaison with Anglian Water for asset avoidance and protection. |

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| | On-Site Substation Compounds. These buildings are expected to accommodate a small number of staff (approximately 10 operational personnel), and therefore foul water flows will be minimal.<br><br>Paragraph 5.9.2 confirms that foul flows will be managed via a sealed cesspit, with no discharge to ground or overflow to any pipe system. AW understands that there is no proposed connection to the public foul or surface water sewer network and welcome this approach. | |
| Flood risk from third party infrastructure | Flooding from other sources should include reference to AW infrastructure and further detail provided regarding potential temporary effects on flood risk from third party infrastructure works during construction of the scheme should be provided, given the interfaces between the scheme and AW assets. These interfaces will also be managed through the BPPs and agreed construction practices. Notwithstanding the lead roles of the Lead Local Flood Authority, the Environment Agency and the Internal Drainage Boards, AW would welcome clarification on how resultant impacts on the local drainage/ sewerage network will be designed as part of the detailed scheme. | No Anglian Water sewer assets have been identified that the Scheme would propose a connection to. Future third party infrastructure works are not currently known and cannot be reasonably accounted for within **ES Appendix 11-4: Outline Drainage Strategy** [APP-227} or **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref 6.3 Rev 2). However, good practice measures to mitigate flood risk impacts during construction and to protect existing utilities are set out within the **OCEMP** (Doc Ref. 7.10 Rev 2). |
| Surface Water and Foul Water | Surface Water and Foul Water Drainage Wastewater for the construction, operation and decommission of | The Applicant notes and confirms the responses reflect the contents of **ES Appendix 11-4: Outline Drainage Strategy** |

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| Drainage Wastewater | the scheme is detailed within the Outline Drainage Strategy (APP -227) which has been developed alongside the FRA to manage surface water runoff, to ensure there is no increase in flood risk on the site or surrounding areas. The AW note the strategy explains the mitigation measures proposed to prevent any increase in surface water discharge rates and to provide appropriate water quality treatment of runoff. These measures comprise of sustainable drainage solutions, including attenuation ponds. As a result, no connection to the foul sewer network is required, and no discharges to the public foul system are proposed. AW notes the absence of a 'No Right to Connect' provision within the Draft DCO (APP-028). | [APP-227 to APP-232]. Applicant's proposed approach to foul water management (i.e. with no connection to the foul sewer network) is secured through compliance with **ES Appendix 11-4: Outline Drainage Strategy** [APP-227 to APP-232], **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1). |
| Firewater runoff | Paragraphs 5.8.1–5.8.3 of the Outline Drainage Strategy (APP-227) set out the need to manage fire risk within the BESS compound, including provision of water for fire suppression and containment of potentially contaminated firewater runoff. In the unlikely event of a fire, runoff will be captured within an impermeable-lined basin located north of the 400kV Substation and BESS Compound, preventing infiltration to ground. The stored water will be tankered off site for testing and disposal at a licensed facility, with the basin subsequently cleaned. The system will be controlled by | Noted, no further response required. |

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| | a penstock valve positioned near the access road, with both automated (linked to fire detection) and manual override functions. AW supports this approach. AW supports the proposed approach to surface water and foul water drainage and welcome our inclusion as a consultee within the dDCO Schedule 2 - Requirements - Surface and Foul Water Drainage (Paragraph 10) (APP-028), so we are consulted on details of the surface water drainage strategy and any foul water drainage system. AW will review the details further upon formal consultation at the discharge of relevant requirements. | |
| Outline Management Plan Documents | The Non-Technical Summary (APP-070), paragraph 2.3.18, explains the construction phase will be managed in line with a series of management plans designed to regulate and control activities. In a similar way, several management plans have also been developed as part of the DCO Application to outline how activities will be managed during the operational phase. The outline documents prepared include, among others: • Outline Construction Environmental Management Plan (APP-275). • Outline Operational Environmental Management Plan (APP-276). • Outline Construction Traffic Management Plan (APP-278/279). • Outline Battery Safety Management Plan (APP-284); and • ES Appendix 11-4: Outline Drainage Strategy (APP-227) AW notes the submission of these framework | The management of interactions with existing utility infrastructure, including water supply and sewerage assets, will be considered as part of the detailed design post-DCO consent in accordance with the Protective Provisions included in the **Draft DCO** (Doc Ref. 3.1 Rev 2). Primarily, the Scheme has designed the works to avoid assets in the first instance, however where this is not possible, active mitigation measures will be taken. The Protective Provisions provide mechanisms for protecting and managing interfaces with relevant utility assets.<br><br>The Applicant is committed to undertaking further engagement with Anglian Water and has prepared a **Statement of Common Ground with Anglian Water** (Doc Ref. 8.22) for Deadline 1. |

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| | documents with the dDCO and would welcome specific reference on how the interfaces with utility assets such as for sewers and water supply within the Order Limits will be managed through the construction of haul roads and bellmouths. Whilst Protective Provisions should address those interfaces with our assets, AW would welcome further discussion with the Applicant regarding such matters through a SoCG.<br><br>Table 3-13 Utilities within the Construction Environmental Management Plan (APP-275) refers to potential interferences with existing utilities infrastructure above and below ground in close proximity to the Scheme. The scheme, within Table 3-13, proposes mitigation measures to reduce the risk of damaging utilities during construction to include mapping infrastructure that intersects the Scheme and avoiding it through detailed design where practicable. Where avoidance is not possible, or works are required within easement zones, detailed design, mitigation, and construction methods will be agreed in consultation with the relevant statutory undertakers before works begin, in line with the protective provisions in the Draft DCO. Further mitigation measures include techniques such as ground-penetrating radar and trial trenching, prior to excavation, to identify both known and unknown utilities. | The Applicant will undertake ground loading assessments where the Haul Road is required to cross Anglian Water assets. The assessments will demonstrate that the imposed loading remains within acceptable limits and will propose appropriate mitigation measures such as ground protection mats, temporary bridging arrangements or other controls will be implemented. Details of such assessments and mitigation measures will be submitted to Anglian Water for review and approval prior to the commencement of the works. In this context, the Applicant welcomes the receipt of Anglian Water's Protective Provisions for consideration. The Applicant is committed to ensuring that Anglian Water is not unduly affected by the Scheme and will ensure that all the required mitigations are in place prior to the commencement of the Scheme.<br><br>The Applicant will continue to carry out utility surveys and refine the detailed design to confirm the location of Anglian Water assets.<br><br>The Applicant acknowledges Anglian Water's requirement to maintain access to its assets for the purposes of ongoing operation, maintenance, repair etc. The detail of these arrangements, as well as any commercial impacts, continues to be discussed. |

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| | The management documents should include steps to remove the risk of damage to AW assets from plant and machinery (compaction and vibration during the construction phase), including any haul and access roads and crossings. AW would also seek to ensure that 24 hours/ 7-day access to our assets is not compromised and, therefore, would welcome further discussion with the Applicant regarding such matters and their inclusion in the finalised documents.<br><br>AW reserves its position on the need to be included as a consultee to these detailed management plans, under the discharge of requirements relating to these under Schedule 2 – Requirements. Specifically, requirements within the DCO Order (6) Battery safety management plan in terms of water and wastewater, (12) Construction environmental management plan; (13) Operational environmental management plan; (15) Construction traffic management plan; and (21) Decommissioning and restoration. | |
| Source Protection Zones | Chapter 11: Hydrology and Flood Risk (APP-062), paragraph 11.6.28 states there are no groundwater protection zones in the Solar Development Area and Inter Array Connections. Notwithstanding the above, it is important that the scheme adopts appropriately designed systems to minimise any risk of ground contamination, including the avoidance of PFAS- | There are no groundwater Source Protection Zones in the area, as stated in paragraph 11.6.28 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). In the EIA Scoping Opinion (included within **ES Appendix 1-2** [APP-167]), the Planning Inspectorate agreed to scope out |

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| | containing coatings where possible. AW agree the order limits sit outside source protection zones; however, we welcome the schemes proposed drainage systems associated with the BESS compounds which will be lined with an impermeable barrier to prevent any pollution risk associated with fire run off from entering the ground as detailed in the Outline Drainage Strategy (APP-227) paragraph 5.2.16. | groundwater aquifers from the assessment process based on the underlying geology.<br><br>However, the use of standard and good practice mitigation measures for the controlling of risk to controlled waters, which includes both surface waters and any groundwater, is noted within Table 3-7 Hydrology and Flood Risk in **OCEMP** (Doc Ref. 7.10 Rev 2). This also notes the use of guidance within CIRIA report C532[34]: Control of water pollution from construction sites and CIRIA report C648 Control of water pollution from linear construction sites. The **OCEMP** (Doc Ref. 7.10 Rev 2) has been updated at Deadline 1 to confirm that no PFAS coatings for solar panels will be used.<br><br>Management of spillage risk is also discussed, which would present a potential risk of pollution to surface water or from infiltrating to groundwater.<br><br>Similarly, Table 3-8 of the **OOEMP** (Doc Ref. 7.11 Rev 1) requires regular inspections and maintenance of all equipment to be undertaken in order to identify any damage early. Any panels which require maintenance / replacement will be removed and replaced. |

[34] Masters-Williams, H. et al. (2001) Control of water pollution from construction sites: Guidance for consultants and contractors. CIRIA Report C532. Available at: CIRIA website (Accessed: 29 July 2026).

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | **ES Appendix 11-4: Outline Drainage Strategy** [APP-227 to APP-232] includes the proposed use of a lined attenuation basin to retain any fire water runoff in the event of a BESS fire. This includes an automated penstock, with manual override, to prevent discharge of this water to the surface water and groundwater environment. The assessment allows for a surface water rainfall event to occur at the same time, representing a conservative assessment of firewater runoff volume capture. |
| Cumulative Impacts | AWS welcomes the identification of other schemes in relation to cumulative effects, including the assessment of interactions and potential impacts between the project and other developments affecting a shared receptor or resource (APP-170). AWS notes the recognition of the interface between this scheme and the Grimsby to Walpole NSIP, particularly in terms of cumulative impacts on hydrology and flood risk. AWS would also like to highlight the potential cumulative effects on the Weston Marsh Water Reservoir and Booster Station, given the close proximity of both schemes to these assets. | Pylon positions have been designed with a minimum baseline of 30m stand-off from the pylon centre to Anglian Water assets, which exceeds the stand-off parameters provided by Anglian Water. Any interactions with assets both above ground and below ground will be discussed with Anglian Water during the detailed design and construction phase to determine a suitable design and/or mitigation solution that works for both parties, for example, protection plates.<br><br>All direct impacts to Anglian Water assets would be mitigated through the detailed design process in liaison with Anglian Water, as established through the protective provisions within the **Draft DCO** (Doc Ref. 3.1 Rev 2). Similar arrangements are expected to be established by the Grimsby to Walpole DCO, in order for the cumulative scheme to be consented. At detailed design stage, a |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | coordinated arrangement with the Grimsby to Walpole scheme would be developed. |

## 3.3. Cadent Gas Limited

3.3.1. Table 3-3 below sets out the Applicant's response to the issues raised within the Relevant Representation from Cadent Gas Limited [RR-018] including signposting to the relevant sections of the DCO Application.

**Table 3-3: Cadent Gas Limited**

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| Impacts on Cadent apparatus | The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on Cadent's existing apparatus located within this area, and Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards. Cadent has gas pipelines and associated apparatus located within the order limits which are affected by works proposed (as noted in the Book of Reference), the extent to which is still being assessed and which may require diversions subject to the impact. Any proposed diversions have not yet reached detailed design stage and so the positioning, land rights and consents required for these gas diversions are not confirmed. | Protective Provisions for electricity, gas, water and sewerage undertakers are included within Schedule 13, Part 1 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). In addition, the Applicant is engaging with Cadent Gas Limited in relation to its apparatus within the Order Limits, including the scope and wording of any bespoke Protective Provisions required to protect retained apparatus and regulate works in proximity to Cadent infrastructure.<br><br>The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), which identifies the current status of engagement with Cadent Gas Limited, including negotiations regarding Protective Provisions and any asset protection requirements.<br><br>At this stage, the Applicant does not anticipate that diversions of Cadent apparatus will be required. The only interactions with Cadent Gas assets are envisaged to be in High Road (A151) where construction access points are required into the fields. The Application will work with Cadent to identify these pipelines, their depths and agree |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | appropriate protection methods during detailed design and construction.<br><br>The Applicant will continue to engage with Cadent Gas Limited throughout the Examination with a view to agreeing an appropriate package of protections for Cadent's apparatus and land interests and ensuring that the Scheme can be delivered safely and without unacceptable impacts on Cadent's assets. |
| Protective provisions | At this stage, Cadent is not satisfied that the tests under section 127 of the Planning Act 2008 can be met. Cadent has experience of promoters securing insufficient rights in land within DCOs for necessary diversions of its apparatus or securing rights for the benefit of incorrect entities. It is important that sufficient rights are granted to Cadent to allow Cadent to maintain its gas distribution network in accordance with its statutory obligations. Protective provisions for the benefit of Cadent have not been included in the draft DCO despite Cadent engaging with the Applicant at the pre-application stage and identifying that protective provisions are required. | Protective Provisions for electricity, gas, water and sewerage undertakers are included within Schedule 13, Part 1 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). In addition, the Applicant is engaging with Cadent Gas Limited regarding its apparatus and land interests within the Order limits, including the scope and wording of any bespoke Protective Provisions required to protect retained apparatus and regulate works in proximity to Cadent infrastructure.<br><br>The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), which identifies the current status of engagement with Cadent Gas Limited, including negotiations relating to Protective Provisions and asset protection requirements. The Applicant has provided comments on Cadent's proposed Protective Provisions and discussions remain ongoing. |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | The Applicant does not agree that the absence of agreed bespoke Protective Provisions at this stage indicates that the tests in section 127 of the Planning Act 2008 cannot be met. The Applicant is continuing to engage constructively with Cadent Gas Limited with a view to agreeing appropriate protections for Cadent's apparatus and land interests during the Examination. |
| Protective provisions | As a responsible statutory undertaker, Cadent's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. Whilst the project interacts with Cadent's apparatus, the draft DCO does not include a form of protective provisions for Cadent's benefit and adequate protective provisions for the protection of Cadent's statutory undertaking have not yet been agreed but are in discussion between the parties. | The Applicant acknowledges Cadent's role as a statutory undertaker and the importance of ensuring that its apparatus and statutory functions are appropriately protected.<br><br>Protective Provisions for electricity, gas, water and sewerage undertakers are included within Schedule 13, Part 1 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). In addition, the Applicant is engaging with Cadent Gas Limited regarding the scope and wording of any bespoke Protective Provisions required to protect Cadent's apparatus and interests. The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), which records the current status of engagement between the parties, including ongoing negotiations in relation to Protective Provisions and asset protection requirements.<br><br>The Applicant notes Cadent's statement that adequate Protective Provisions have not yet been agreed. |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | Discussions remain ongoing and the Applicant will continue to engage constructively with Cadent throughout the Examination with a view to reaching agreement on an appropriate package of protections. The Applicant is committed to ensuring that the Scheme can be delivered without unacceptable impacts on Cadent's apparatus and without prejudicing Cadent's ability to fulfil its statutory obligations. |
| Protective provisions | Protective provisions for the benefit of Cadent's statutory undertakings have been included in a number of recently made DCOs and Cadent's preferred form of protective provisions for inclusion within the DCO are included at Appendix 1. Cadent requests that these are included at Part 4 of Schedule 13 to the DCO. The substance of these protective provisions is consistent with other protective provisions included in the Applicant's draft DCO and with the requirement for security provisions in respect of potential liabilities secured at Article 48 of the Applicant's draft DCO. | 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. The Scheme has been designed to minimise interaction with existing utilities where reasonably practicable. Protective Provisions for electricity, gas, water and sewerage undertakers are included within Schedule 13, Part 1 of the **Draft DCO** (Doc. Ref 3.1 Rev 2). 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 govern works in proximity to Cadent infrastructure. The latest position on those negotiations is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), which identifies the current status of engagement with Cadent Gas Limited, including discussions relating to protective provisions and any asset protection requirements. At this stage, no |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | 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 entering into appropriate agreements. 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. |
| Protective provisions | The explanatory memorandum does not explain why protective provisions have not been included for Cadent's benefit or justify the departure from Cadent's requirement that the preferred form of protective provisions are included in the DCO. The Applicant's approach is not consistent with section 3.1.4 of the Guidance "Nationally Significant Infrastructure Projects - Advice Note Fifteen: drafting Development Consent Orders" Updated 24 March 2025 (Advice Note Fifteen). | The Applicant does not agree that the approach taken is inconsistent with section 3.1.4 of Advice Note Fifteen.<br><br>As outlined in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), the Applicant is engaged in ongoing discussions with Cadent Gas Limited regarding the scope and wording of any bespoke Protective Provisions required for the protection of Cadent's apparatus and interests. Those discussions remain ongoing and no agreed form of bespoke Protective Provisions has yet been reached.<br><br>In accordance with Advice Note Fifteen, the **Draft DCO** (Doc Ref 3.1 Rev 2) includes Protective Provisions for electricity, gas, water and sewerage undertakers within Schedule 13, Part 1. At the time of application, the Applicant considered these provisions to represent the |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | appropriate form of protection pending the outcome of ongoing negotiations with individual statutory undertakers.<br><br>The Applicant has reviewed Cadent's proposed Protective Provisions and is continuing to engage constructively with Cadent with a view to agreeing any bespoke drafting required during the Examination. The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2). |
| Protective provisions | Cadent is engaged with the Applicant but has not yet reached satisfactory agreement. Cadent's solicitors have sought to engage with the Applicant in respect of the protective provisions over a significant period of time with no substantive response from the Applicant. Cadent's preferred form of protective provisions, which are widely used in DCOs, were provided to the Applicant in January 2026<br><br>Cadent wishes to reserve the right to make further representations as part of the examination process but will continue to seek to engage with the Applicant to reach a satisfactory agreement. Cadent will keep the examining authority updated in this regard. | The Applicant has reviewed Cadent's preferred form of Protective Provisions and has provided comments on that drafting. Discussions between the parties remain ongoing, and the latest position is recorded in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2).<br><br>The Applicant welcomes Cadent's continued engagement throughout the Examination and will continue to work constructively with Cadent with a view to agreeing an appropriate package of protections for Cadent's apparatus and statutory undertaking. |

## 3.4. Defence Infrastructure Organisation

3.4.1. Table 3-4 below sets out the Applicant's response to the issues raised within the Relevant Representation from the Defence Infrastructure Organisation [RR-040] including signposting to the relevant sections of the DCO Application.

**Table 3-4: Defence Infrastructure Organisation**

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| Principle of Development | At this early consultation stage, where no precise details are available for the locations of the proposed OHL/lattice towers, MOD representations are limited to the principle of the development only. | The Applicant notes the comment. |
| Low Flying | The proposed development falls within Low Flying Area 6 (LFA 6), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of steel lattice towers in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area. To address this impact, and given the location and scale of the development, the MOD is likely to require conditions be added to any consent issued requiring that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. | The Applicant has provided the DIO with information to inform its assessment and will continue to engage with the DIO as that assessment progresses. |
| Technical Site Safeguarding Zones | Technical safeguarding zones define areas surrounding radars, radio transmitter/receiver sites and other types of technical installations supporting operational defence or national security requirements within which the heights of development, materials used in construction and | As set out in the **Statement of Common Ground with the Defence Infrastructure Organisation** (Doc Ref. 8.19), the pylons are not expected to introduce any adverse effects on the |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | introduction of sources of electro-magnetic fields are regulated.<br><br>Based upon the information provided, it is noted that part of the proposed cable route corridor occupies the technical safeguarding zone in place to protect receivers and microwave links that form part of the Central WAM Network, which consists of nodes and connecting pathways providing air traffic control data for air navigation services, and within which the MOD must be consulted on any development or change of land use. | performance of the Central WAM Network or Low Flying Area 6.<br><br>The DIO is continuing to investigate the transmission lines that will pass through a critical zone of the Central WAM Network. |
| Tall infrastructure | Of particular concern, is the area shown on the applicant's drawing titled DCO_B/LP/KP/01 in the area where Sheets 3 and 4 intersect. It is likely that the MOD would request that underground cable routing be used in these locations however, if not practicable, precise locations of any proposed lattice towers and cable positioning will be required to ensure that cable routing is compatible with MOD's safeguarding requirements. In addition, the MOD is likely to request information in advance of the use of any cranes, tall construction equipment or temporal structures to be used in the construction phase of this development, to ensure defence capability and operations are not adversely affected. The MOD would welcome further discussion | The positioning of pylons for the Grid Connection Route are subject to a 50m lateral limits of deviation (LoD) which allows for movement away from the proposed centreline, as well as a longitudinal LoD which allows for pylon movements along the proposed centreline. The Limits of Deviation are shown on the **Works Plans** [APP-009 and APP-010].<br><br>To ensure statutory ground clearances are maintained should pylons move, they also have a +7.4m vertical LoD which means they can increase in height by 7.4m beyond what is currently proposed in the design. The **Design Parameters** (Doc Ref. 7.4) restrict the maximum pylon height to 66 metres, which is substantially below the 76.2m threshold for fixed wing operations and flight training. |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | with the applicant before the next stage of the application process. | The current proposal for the grid connection route on the **Land Plans** (Doc Ref. 2.4 Rev 2), specifically drawing DCO_B/LP/KP/01 between the sheet 3 and 4 intersect is a 400kV overhead line (4SV29 to 4SV32). The **Draft DCO** (Doc Ref. 3.1 Rev 2) does not include powers for undergrounding of the connection in this location. The Applicant will therefore continue to work with the Ministry of Defence (MoD) to review the pylon structure locations and conductor profiles in relation to the MoD safeguarding requirements.<br><br>It is currently not anticipated that temporary structures will be required for construction of the 400kV OHL, as the route proposed comprises new-build infrastructure and does not interact with any existing transmission assets. The tallest construction equipment is envisaged to be a mobile crane for pylon erection. The type, height, and location of the equipment will be determined during detailed design, once the pylon locations and heights have been confirmed.<br><br>Final locations of the pylons and parameters of OHL infrastructure will be developed and confirmed during the detailed design and confirmed prior to construction. The Applicant notes the Low Flying Area and Safeguarding Zones and will continue working with the MoD throughout the development of the Scheme, issuing updated information as it becomes available to support safeguarding assessments and ensure the infrastructure can be accurately charted to allow deconfliction. |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | As set out in the **Statement of Common Ground with the Defence Infrastructure Organisation** (Doc Ref. 8.19), the pylons are not expected to introduce any adverse effects on the performance of the Central WAM Network or Low Flying Area 6. |
| Conclusion | In summary the MOD has concerns with this development and these will need to be addressed in the preparation of any future applications for the proposed scheme.<br><br>The MOD must emphasise that the advice provided within this letter is in response to the data and/or information detailed on the Planning Inspectorate website as of the date of this letter. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response. | The Applicant has engaged with the DIO regarding the matters raised in its relevant representation. A summary of the latest position is set out in the **Statement of Common Ground with the Defence Infrastructure Organisation** (Doc Ref. 8.19).<br><br>The DIO is continuing to investigate the transmission lines that will pass through a critical zone of the Central WAM Network. |

## 3.5. Environment Agency

3.5.1. Table 3-5 below sets out the Applicant's response to the issues raised within the Relevant Representation from the Environment Agency [RR-047] including signposting to the relevant sections of the DCO Application.

**Table 3-5: Environment Agency**

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| Estates | | |
| Estates | The EA as landowner has contacted the applicant's solicitor regarding the proposed compulsory acquisition of Environment Agency land as part of the scheme. The current order limit boundary indicates that a small slither of in-land drainage ditch/bank has been included, which forms part of the adjacent statutory Flood Storage Reservoir (FSR). This land is managed in accordance with the requirements of the Reservoirs Act. It is not clear why compulsory acquisition of this parcel of land is required.<br><br>The EA may require access rights across the scheme for inspecting the FSR, as well as permanent clear access for maintenance and repairs to the reservoir banks. | The Applicant has updated the **Land Plan and Crown Plans – Solar Development Area** (Doc Ref. 2.4 Rev 2), **Book of Reference** (Doc Ref. 4.3 Rev 2), **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), **ES Figure 2-2** (Doc Ref. 6.2 Rev 1) and the **OLEMP** (Doc Ref. 7.16 Rev 1) to exclude any works from the land within the ownership of the EA. In addition, the Applicant has updated **ES Figure 2-2** (Doc Ref. 6.2 Rev 1) and **Annex A Outline Landscape Masterplans** of the **OLEMP** (Doc Ref. 7.16 Rev 1) to show an 8m buffer from the EA land ownership boundary and to provide an access arrangement to the FSR. These requirements have also been included within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1) submitted at Deadline 1. |
| Draft Development Consent Order | | |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| **EA1**<br>Preliminary works not covered by Construction Environment Management Plan | The definition of the word 'commence', together with the wording of Requirement 12, have the consequence that the Construction environmental management plan may not be applied to permitted preliminary works.<br>The mitigation commitments secured via the oCEMP will not be applied to preliminary works, creating a risk of pollution to the water environment.<br>Amend the wording of Requirement 12 such that "commence" includes any permitted preliminary works. | The Applicant agrees that, as drafted, the interaction between the definition of "commence" and Requirement 12 could permit certain permitted preliminary works to be undertaken before a construction environmental management plan ("CEMP") has been approved.<br>Requirement 12 of the **Draft DCO** (Doc. Ref. 3.1 Rev 2) has therefore been amended so that it applies to specified permitted preliminary works, including intrusive surveys and investigations, site preparation works, remediation works, apparatus diversions and site clearance activities. Certain low-risk activities, including non-intrusive surveys, removal of plant and machinery, temporary fencing and site security, temporary site notices and advertisements, and advance planting, remain excluded from the requirement. The Applicant considers that the amended drafting appropriately secures the mitigation measures contained within the CEMP whilst avoiding unnecessary approval requirements for activities for which a CEMP is not required. |
| **EA2**<br>Disapplication of | The applicant wishes to disapply Environmental Permitting in respect of flood risk activity. A general request has been | The Applicant has continued to engage with the EA since the submission of the DCO Application on the disapplication of flood risk activity permits by the |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| Flood Risk Activity Permits | made, but further details have not been provided hence agreement is yet to be secured.<br>Risks to the water environment may not be adequately managed.<br>Provide details to include the nature, location and the associated environmental risks of the activities for which disapplication is sought. We will then be able to advise the planning inspectorate if it is appropriate to disapply. | Scheme. This included providing further clarification as to the locations within the Order Limits where proposed works overlap with the River Welland floodplain extents, the types of works proposed within these areas, the key flood risk mitigation measures and design parameters for those areas and how those measures are secured within the DCO Application.<br>The Applicant and the EA continue to negotiate the drafting of bespoke protective provisions which would support this disapplication. |
| **EA3**<br>Environment Agency as a named consultee for requirements | The Environment Agency is currently not included as a named consultee for: Requirement 6 – Battery safety management plan Requirement 10 - surface and foul water drainage<br>If the Environment Agency is not named on the relevant requirements, then we may not be able to secure the required details post-consent.<br>We request to be named as consultee for Requirements 6 and10 | The Applicant notes that the Environment Agency is already identified as a consultee for Requirement 6 (Battery Safety Management Plan) pursuant to Requirement 6(3) of the **Draft DCO** (Doc. Ref 3.1 Rev 2). No amendment is therefore considered necessary in relation to Requirement 6.<br>The Applicant notes the Environment Agency's request to be included as a consultee for Requirement 10 (Surface and Foul Water Drainage). In response, the Applicant has amended Requirement 10 in the **Draft DCO** (Doc Ref. 3.1 Rev 2) submitted at Deadline 1 to include the Environment Agency as a consultee. |

| Topic | Matter Raised | Applicant's Response |
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| **EA4**<br>Use of phrase 'substantially in accordance with' | The use of the phrase 'Substantially in accordance with' in requirements undermines enforceability and creates unnecessary uncertainty.<br>Requirements cannot be enforced appropriately and topic details which have previously been agreed and information that the EA has based its position on can be undermined.<br>Remove the word substantially from all requirements. | The Applicant notes the Environment Agency's comments. The Applicant considers that the phrase "substantially in accordance with" is appropriate and reflects established DCO drafting practice, providing flexibility for minor changes which may (for example) be required to reflect detailed design or the most up to date survey information at the time of construction whilst ensuring consistency with the certified outline documents. Similar drafting has been adopted by the Secretary of State for environmental management plans and other certified documents on recent solar NSIP projects, including One Earth Solar Farm Order 2026, Tillbridge Solar Order 2025 and Fenwick Solar Farm Order 2025.<br>In addition, the detailed versions of the Environmental Management Plans and Battery Safety Management Plan must be submitted to the relevant planning authority for approval following consultation with the Environment Agency, in accordance with the relevant requirements in Schedule 2 to the **Draft DCO** (Doc Ref. 3.1 Rev 2). This provides the Environment Agency with the opportunity to review and comment on the detailed plans and to ensure that all relevant mitigation and management measures have been appropriately incorporated prior to implementation. The use of the |

| Topic | Matter Raised | Applicant's Response |
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| | | phrase "substantially in accordance with" therefore provides appropriate flexibility for detailed design development whilst maintaining regulatory oversight and consistency with the certified outline documents. |
| **EA5**<br>Protective Provisions | The applicant wishes to disapply but our standard Protective Provisions have not been included in the dDCO.<br>Risk that non standard wording of protective provisions could create legal uncertainty and risk to enforcement, with the potential for risk to the Environment.<br>If disapplication is approved then the standard EA protective provisions should be included. | The Applicant has been engaging with the Environment Agency in relation to the disapplication of relevant permits and consents and the replacement of those controls through protective provisions within the **Draft DCO** (Doc Ref. 3.1 Rev 2). The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), which identifies the current status of engagement with the Environment Agency. Those negotiations remain ongoing and the Applicant will continue to engage with the Environment Agency throughout the examination with a view to agreeing an appropriate position. |
| **EA6**<br>Discharge of requirements | There is insufficient time for a named consultee to review and respond to the discharge of requirements to request further information. The LPA must consult a named consultee within 5 working days of receipt of any application to discharge requirements. From the receipt of the consultation the LPA then has a total of 15 working days to request further information. Therefore , the named consultee has just 10 working days to review the | The Applicant considers that the discharge of requirements procedure in Schedule 14 provides an appropriate and proportionate process for consultation and the identification of any further information requirements. The drafting is consistent with that adopted by the Secretary of State in other recent solar NSIP DCOs, including the Tillbridge Solar Order 2025. |

| Topic | Matter Raised | Applicant's Response |
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| | consultation & determine if sufficient information has been provided.<br>Risks to the water environment may not be adequately managed.<br>Amend wording to provide 15 working days for named consultees to review the consultation & determine if sufficient information has been provided. | In addition, Schedule 14 already provides flexibility for alternative timescales to be agreed in writing between the undertaker and the relevant planning authority where appropriate. The Applicant therefore does not consider that the proposed amendment is necessary. |
| Flood Risk | | |
| **EA7**<br>Flood zones and site layout | Detailed flood modelling is available but has not been consistently used to inform site layout. Instead, the FRA reverts to standard Flood Zone classifications to define site suitability and to demonstrate the application of a sequential approach to site layout.<br>Risk of over-simplification of the true extent and nature of flood risk across the site, which could impact on layout design.<br>The FRA should be revised to ensure the design and spatial layout is informed by the most up-to-date and site - specific modelling outputs (as approved by the EA). This would ensure the development is directed to areas of lowest risk, taking into account both defended conditions and residual risks from potential defence failure. | The Scheme layout has not been informed solely or primarily by the standard EA Flood Zone classifications. Whilst the Flood Zone information was used at the Site selection stage, subsequent design development and refinement of the Scheme layout has been informed by the site-specific hydraulic modelling undertaken for the Scheme. **ES Appendix 11-3: Flood Risk Assessment (FRA)** (Doc Ref. 6.3 Rev 2) discusses the Sequential Test in relation to both the broader Site selection process and the Scheme layout development following the detailed modelling undertaken. Paragraphs 6.2.1 to 6.2.6 of the **FRA** (Doc Ref 6.3 Rev 2) discuss the alternative site selection of the proposed location of the Scheme and paragraphs 6.2.7 to 6.2.14 discuss the detailed modelling approach to the layout of |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | infrastructure across the Scheme to avoid areas at risk of flooding, from all sources, as far as reasonably practicable. Site selection was informed by the strategic flood risk information available at that stage. As the Scheme design progressed, detailed site-specific hydraulic modelling has been undertaken and has been used to inform the refinement of the layout and the location of infrastructure. The hydraulic modelling considered both the defended scenarios and the residual flood risk associated with defence breach events. The resulting outputs informed the infrastructure siting and the design of flood mitigation measures across the Scheme.<br><br>In summary, the detailed hydraulic modelling has informed the Scheme layout development as follows:<br>• Work No 1 boundary on **Works Plans** [APP-009] has been drawn to exclude areas of Flood Zone 3b of the Postland Catchment and South Holland Main Drain hydraulic modelling (except for Gotts catchment);<br>• On-Site 132 kV substation in Parcel B was moved into Parcel C to minimise overlap with the River Welland breach extent following statutory consultation (this was consulted on as part of the targeted consultation); |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | • Solar stations have been moved out of areas of Flood Zone 3a and Flood Zone 3b associated with Postland Catchment and South Holland Main Drain Catchment (except for Gotts catchment) in the illustrative design and the commitment is also set out within **Design Parameters** (Doc Ref. 7.4 Rev 2);<br>• Heights for raising infrastructure or the height of bunds / flood defence walls are specified within the **Design Parameters** (Doc Ref. 7.4 Rev 2) on the basis of the hydraulic modelling outcomes.<br>In summary, it is considered the Scheme layout has fully considered the impacts of detailed hydraulic modelling, in terms of locating infrastructure and providing mitigation to ensure the Scheme operates in times of flood. |
| **EA8**<br>Flood defence assets | There is insufficient consideration of EA flood defence assets. There is limited information regarding the construction, condition and standard of protection (SoP) of defences, and limited consideration of the interaction with the proposed development. Key tidal defences along the River Welland (from Fosdyke to Fulney Lock and Marsh Road Sluice in Spalding), and along the frontage of the Washes, are not adequately recognised. There is a lack of | The Applicant has submitted an updated **FRA** (Doc Ref. 6.3 Rev 2) and **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) at Deadline 1 to address the further questions raised in the relevant representation regarding the Environment Agency (EA) flood defence assets located near the Scheme. Further details are provided in the rows below. |

| Topic | Matter Raised | Applicant's Response |
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| | clarity regarding the proximity of the development to the Crowland & Cowbit Washes defences, and provision of access to these assets.<br>Risk of impacts (structural integrity and access) to flood defence assets which could compromise their effectiveness. | |
| | Update the FRA and ES to provide a comprehensive assessment of EA defences across the site and surrounding area. This should include:<br>• Clear identification and mapping of all relevant defences, including tidal and fluvial assets | **ES Appendix 11-3: Annex D, Figure 1-6** (Doc Ref. 6.3 Rev 1) identifies and maps the relevant tidal and fluvial flood defences associated with the River Welland. The nearest flood defence asset is located within the Order Limits at the western border section of Land Parcel A, which is a drainage ditch associated with the outer Barrier Bank embankment defence of with Crowland and Cowbit Washes. This can also be seen within the context of the Scheme layout on **ES Figure 2-2** (Doc Ref. 6.2 Rev 1). |
| | • Detailed information on the condition, standard of protection and functional role of these defences | The Environment Agency AIMS database indicates the Barrier Bank has an average condition rating of 2 along the Washes, with one section with asset ID: 503834 by Queens Bank as grade 4 with a target grade of 2; however the last inspection is noted as 2024, and was due inspection in 2025. It is anticipated the |

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| | | Environment Agency will have rectified any concerns from the condition grade 4 at this location through their role as owner and undertaker of the Statutory Reservoir (as noted in the AIMS database).<br><br>Paragraph 4.3.4 of the **FRA** (Doc Ref. 6.3 Rev 2) has been expanded, and paragraphs 4.3.5 to 4.3.8 included, to provide additional information on the functional role of the flood defences along the River Welland in managing tidal and fluvial flood risk. The tidal flood defences include Fulney Lock, Marsh Road Sluice, and the fluvial defences include Crowland and Cowbit Washes, a Large Raised Reservoir for flood storage. Information on the condition and Standard of Protection (SoP) of the relevant EA flood defence assets has also been incorporated into this section of the FRA, using data obtained from the EA's Spatial Flood defences database.<br><br>In addition, paragraph 4.3.10 of the **FRA** (Doc Ref. 6.3 Rev 2) discusses tidal flood risk and confirms that the tidal limit of the River Welland is controlled by the tidal sluices at Fulney Lock and Marsh Road Sluice, Spalding. The tidal defences at Fulney Lock and Marsh Road Sluice provide protection up to the 0.5% AEP (1 in 200 year) event, as set out in the EA's current Catchment |

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| | | Flood Management Plan for Anglian Region[35]. Detailed hydraulic modelling confirms the River Welland fluvial defences (Crowland and Cowbit Washes) provide protection for the 0.1% AEP plus 28% climate change event.<br><br>It is concluded that tidal flood risk to the Scheme represents a low residual risk associated with the potential failure or overtopping of these structures, which are maintained by the Environment Agency. |
| | • Explicit assessment of the proximity of all proposed development (including solar arrays, substations, pipelines, and grid connections) to flood defences and main rivers, including confirmation of whether any connections pass beneath or intersect with these assets | **ES Appendix 11-3: Annex D, Figure 1-6** (Doc Ref. 6.3 Rev 2) identifies and maps the relevant tidal and fluvial flood defences associated with the River Welland. The nearest flood defence asset is located within the Order Limits at the western border section of Land Parcel A, which is a drainage ditch associated with the outer Barrier Bank embankment defence of Crowland and Cowbit Washes. This can also be seen within the context of the Scheme layout on **ES Figure 2-2** (Doc Ref. 6.2 Rev 1). With the exception of the drainage ditch along the western border of Land Parcel A, the |

[35] Environment Agency (2022) Anglian River Basin District Flood Risk Management Plan 2021 to 2027. Available at: https://assets.publishing.service.gov.uk/media/6374f46ae90e07285214048f/Anglian-FRMP-2021-2027.pdf [Accessed 23/07/2026]

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| | | Scheme's infrastructure is located over 16m of the River Welland and its flood defences in all other locations.<br><br>Paragraph 5.3.50have been included in the **FRA** (Doc Ref. 6.3 Rev 2) to state the separation distances between the River Welland flood defences and the Order Limits of the Scheme. |
| | • Demonstration of how access to defences (for maintenance and operation) will be maintained throughout the lifetime of the development | Following the submission of the Environment Agency's relevant representation, the Applicant has undertaken further engagement with the Environment Agency to confirm access requirements. The following updates have been made to the Application documents at Deadline 1:<br><br>• **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1) have been updated to include a commitment for the provision of an 8m wide access to the Environment Agency's land (drainage ditch) along the western boundary of Parcel A which forms part of the Crowland and Cowbit Washes Flood Storage Reservoir and flood defence;<br><br>• **ES Figure 2-2** (Doc Ref. 6.2 Rev 1) and **Annex A Outline Landscape Masterplans within the** |

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| | | **OLEMP** (Doc Ref. 7.16 Rev 1) have been updated to illustrate how the 8m clear zone for access, measured along the length of the Environment Agency's land ownership boundary, could be provided. This access will allow for Environment Agency's flood risk management, reservoir safety maintenance and other works.<br><br>With regards to other impacts on access to flood defences, there are no road closures or Heavy Goods Vehicles / Abnormal Indivisible Load routes on local roads that provide direct access to the flood defences (e.g. Wash Bank / Peak Hill / Barrier Bank / Marsh Road), as demonstrated by **ES Figure 15-3** [APP-161], **ES Figure 15-4** [APP-162] and **OCTMP** [APP-278].<br><br>With these measures in place, the Scheme is not considered to impact on access to the existing flood defences. |
| | • Consideration of residual risks associated with defence failure, including tidal defences and key control structures, such as Fulney Lock and Marsh Road Sluice | The Applicant has considered residual flood risk associated with the flood defence failure of the River Welland (including Fulney Lock and Marsh Road Sluice) through hydraulic modelling undertaken for the River Welland breach assessment. Four breach locations along the Crowland-Cowbit Washes embankment were modelled to determine the flood risk on the proposed |

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| | | infrastructure, with the suitability of these locations confirmed by the EA during a meeting on 25 July 2025. Paragraph 5.3.48, and paragraphs 5.3.51 to 5.3.72 of the **FRA** (Doc Ref. 6.3 Rev 2) provides further details of the breach modelling results, including potential impacts on the Scheme, the proposed mitigation measures and the quantitative assessment of the residual flood risk. The assessment, therefore, adopts a conservative approach to ensure the potential impacts of a flood defence breach are appropriately considered within the flood risk assessment.<br><br>Paragraph 5.6.13 of the **FRA** (Doc Ref. 6.3 Rev 2) presents the tidal sensitivity assessment undertaken at Fosdyke Bridge. The modelling demonstrates that peak river levels at the Site are insensitive to changes in the tidal boundary (less than 100mm), and therefore the tidal flood risk influence from the River Welland to the Site is considered low, with fluvial flooding representing the primary source of flood risk to the Scheme. |
| | • Clear, consistent plans showing all proposed bunding and flood mitigation measures | **Figure 1-4: Solar Panel Flood Mitigation Design Parameters** located in **ES Appendix 11-3 Annex D** (Doc Ref. 6.3 Rev 2) illustrates the solar panel flood mitigation design parameters across the Site. The figure identifies areas where panels will be installed at a |

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| | | minimum height of 0.8m above ground, as well as areas where panel heights vary between 0.8m and 1.3m above ground, measured from the base of the panel. These ranges are categorised as Band 1 and Band 2 to distinguish between the different panel height requirements. The bands are defined by the hydraulic modelling outputs, based on the maximum (worst-case) flood depth mapping across each assessed catchment and the required freeboard of 0.3m where this is possible to achieve within the maximum height parameter for the solar panels.<br><br>**Figure 1-5: Solar Station Flood Mitigation Design Parameters** also located in **ES Appendix 11-3 Annex D** (Doc Ref. 6.3 Rev 2) provides clear mapping of the different mitigation requirements for solar stations varying across the Site based on the level of flood risk identified.<br><br>The Drainage General Arrangement drawing in Annex D of **ES Appendix 11-4: Outline Drainage Strategy** [APP-231] shows the proposed bunding of the On-site substations across the Solar Development Area. |
| | • Revision of relevant sections of the ES and FRA to ensure consistency and clarity in the assessment of fluvial | Paragraphs 4.3.10 to 4.3.15 of the **FRA** (Doc Ref. 6.3 Rev 2) have been updated to provide more clarity on the tidal flood risk of the Scheme, including more |

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| | and tidal flood risk and the project's interaction with flood defence infrastructure. | information on the tidal flood defences along the River Welland. The tidal flood risk assessment has also been refined to state that while the tidal flood defence assets along the River Welland substantially reduce tidal flood risk, a residual risk remains associated with the failure of the tidal defence network. Paragraphs 11.6.36 and 11.8.27 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) have been updated to ensure consistency with the tidal flood risk conclusions of the FRA. Both the **FRA** (Doc Ref. 6.3 Rev 2) and **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) have been updated to include more detail on the flood defence infrastructure that surrounds the Scheme. |
| **EA9**<br>Crowland and Cowbit Washes reservoir | Inadequate recognition of the Crowland and Cowbit Washes as a designated large raised reservoir under the Reservoirs Act 1975. The operation of the Washes and their interaction with fluvial and tidal defences is not clearly represented. Inadequate consideration of key aspects such as proximity of development to the reservoir embankments, required standoff distances, and maintenance/access requirements.<br>Risk of incomplete assessment of fluvial and reservoir flood risk and underestimation of potential flood hazards (eg. flood pathways and residual risks) to the development and surrounding area. Risk that the operation, inspection | The Applicant has updated the **FRA** (Doc Ref. 6.3 Rev 2) to include further details of the Crowland and Cowbit Washes large raised reservoir in accordance with the comments received. Detailed responses to the comments received are set out in rows below. |

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| | and maintenance of the reservoir, in accordance with statutory safety requirements, could be compromised. | |
| | Provide an assessment of the Crowland and Cowbit Washes as a designated large raised reservoir. This should include:<br>• Correct identification of reservoir ownership and classification under the Reservoir Act 1975 | Paragraph 4.3.8 of the **FRA** (Doc Ref. 6.3 Rev 2) has been updated to provide a description of the reservoir ownership and classification under the Reservoir Act 1975. |
| | • A detailed explanation of the operational function of the Washes and their role in managing fluvial flood risk | Paragraph 4.3.8 of the **FRA** (Doc Ref. 6.3 Rev 2) has also been expanded to provide details of the operational function of the Crowland-Cowbit Washes and their role in managing fluvial flood risk, using information from the Lower Welland – Fens 2100+ flood risk baseline report[36]. |
| | • A full assessment of reservoir flood risk, including breach and overtopping scenarios, ensuring consistency across all documents and resolution of any contradictory statements | The Applicant has considered residual flood risk associated with the failure of the Crowland-Cowbit Washes embankments, for a breach scenario, through hydraulic modelling undertaken for the River Welland. Four breach locations along the Crowland-Cowbit |

[36] Arup (2025) Lower Welland: Flood Risk Baseline 2025. Available at: https://assets.publishing.service.gov.uk/media/69caa888b111d64c49bb3da4/Fens_2100+_Lower_Welland_-_Flood_Risk_Baseline.pdf [Accessed 23/07/2026]

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| | | Washes embankment were modelled to determine the flood risk on the proposed infrastructure, with the suitability of these locations confirmed by the EA during a meeting on 25 July 2025. The assessment adopts a conservative approach by assuming a failure of the flood defences under extreme flood conditions to ensure the potential impacts of this flood risk on the proposed infrastructure is fully assessed. Paragraph 5.3.44 to 48, and paragraphs 5.3.51 to 5.3.72 the **FRA** (Doc Ref. 6.3 Rev 2) provides further details of the breach modelling results, including potential impacts on the Scheme, the proposed mitigation measures and the quantitative assessment of the residual flood risk. The assessment, therefore, adopts a conservative approach to ensure the potential impacts of a flood defence breach caused by the breach of the embankments of Crowland-Cowbit Washes are appropriately considered within the **FRA** (Doc Ref. 6.3 Rev 2).<br><br>The hydraulic modelling also considers the defended scenario for the 0.1% AEP plus 28% climate change event. The modelling demonstrates that floodwater fills up the Crowland-Cowbit Washes between the inner and outer bank defences but does not overtop the Outer Bank of the Washes for the 0.1% AEP plus 28% climate change event, confirming there would be no |

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| | | overtopping for an extreme event. This is discussed in paragraphs 5.3.9 and 5.3.10 in the **FRA** (Doc Ref. 6.3 Rev 2). |
| | • Clear mapping of the proximity of all development to the reservoir embankments, with defined standoff distances | **ES Appendix 11-3: Annex D, Figure 1-6** (Doc Ref. 6.3 Rev 2) includes mapping of the proximity of the Order Limits to the Crowland-Cowbit Washes as well as other nearby existing flood defences. The Applicant has undertaken further engagement with the Environment Agency which has confirmed that the Environment Agency's land within the western part of Parcel A forms part of the Cowbit to Crowland Washes Flood Storage Reservoir (a drainage ditch associated with the embankment). This can also be seen within the context of the Scheme layout on **ES Figure 2-2** (Doc Ref. 6.2 Rev 1). As requested by the Environment Agency, the Applicant has excluded compulsory acquisition rights for this area of land and incorporated an 8m buffer to provide access. These measures have been secured through the updated the **Land Plan and Crown Plans – Solar Development Area** (Doc Ref. 2.4 Rev 2), **OLEMP** (Doc Ref. 7.16 Rev 1), **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1) submitted at Deadline 1. |

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| | • Demonstration of how safe and unobstructed access to reservoir banks will be maintained for inspection, maintenance, and emergency response throughout the development lifetime. | As set out above, following the submission of the Environment Agency's relevant representation, the Applicant has undertaken further engagement with the Environment Agency to confirm access requirements. The following updates have been made to the Application documents at Deadline 1:<br>• **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1) have been updated to include a commitment for the provision of an 8m wide access to the Environment Agency's land (drainage ditch) along the western boundary of Parcel A which forms part of the Crowland and Cowbit Washes Flood Storage Reservoir and flood defence;<br>**ES Figure 2-2** (Doc Ref. 6.2 Rev 1) and **Annex A Outline Landscape Masterplans within the OLEMP** (Doc Ref. 7.16 Rev 1) have been updated to illustrate how the 8m clear zone for access measured along the length of the Environment Agency's land ownership boundary, could be provided. This access will allow for Environment Agency's flood risk management, reservoir safety maintenance and other works. |
| | • Consideration of appropriate boundary treatments (e.g. fencing, landscaping) to avoid creating habitats for | The Crowland and Cowbit Washes Flood Storage Reservoir embankment/ flood defence is separated |

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| | burrowing animals or introducing other risks to embankment stability. | from the Scheme by a drainage ditch, an 8m buffer, and a landscaped boundary comprised of scattered trees and shrubs and fencing, as illustrated on **ES Figure 2-2** (Doc Ref. 6.2 Rev 1) and **Annex A: Outline Landscape Masterplans of the OLEMP** (Doc Ref. 7.16 Rev 1). The boundary treatment in this form is not considered to provide primary habitat for burrowing animals, such as badger, or introduce other risks to embankment stability. |
| **EA10**<br>Tidal flood risk | There is inadequate understanding of tidal flood risk. The River Welland is tidal from the Wash to Spalding, with significant defences along the Wash frontage and along the tidal reach from Fosdyke to Marsh Road Sluice and Fulney Lock. However, these defences and their role in managing tidal flood risk are not adequately reflected within the FRA. Inconsistencies are present within the ES: paragraph 11.6.37 refers to tidal risk from the River Nene and the Wash Frontage without clearly identifying the modelling basis, while paragraph 11.6.64 incorrectly states that the Grid Connection Route is not at risk of tidal flooding, despite its reliance on defended conditions along the River Welland.<br>Risk of underestimation of flood risk across the site and inappropriate siting of infrastructure in areas that may be vulnerable during extreme events. Potential risk for the | The Applicant has revised the **FRA** (Doc Ref. 6.3 Rev 2) to provide additional assessment of the Environment Agency (EA) flood defence assets located near the Scheme and the tidal flood risk to the Grid Connection Route. **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) has also been updated accordingly. Detailed responses to the comments raised are provided in rows below. |

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| | safety and resilience of the proposed development and non-compliance with national planning policy and flood risk guidance. | |
| | The FRA and ES should be updated to provide a comprehensive and consistent assessment of tidal flood risk. This should include:<br>• A clear description of the tidal nature of the River Welland and the role of defences from the Wash to Spalding (including Fosdyke, Fulney Lock, and Marsh Road Sluice) | Paragraph 4.3.5 of the **FRA** (Doc Ref. 6.3 Rev 2) has been expanded, and paragraphs 4.3.6 to 4.3.9 included to provide additional information on the functional role of the flood defences along the River Welland in managing tidal and fluvial flood risk. These flood defences include Fulney Lock, Marsh Road Sluice and the Crowland and Cowbit Washes. Information on the condition and Standard of Protection (SoP) of the relevant EA flood defence assets has also been incorporated into this section of the revised **FRA** (Doc Ref. 6.3 Rev 2), using data obtained from the EA's Spatial Flood defences database. |
| | • Greater clarity regarding the interaction between tidal sources (Wash frontage, River Welland, and River Nene) and the extent to which defences reduce flood risk. | Paragraph 4.3.5 of the revised **FRA** (Doc Ref. 6.3 Rev 2) has been expanded to provide additional information on the functional role of the flood defence Fulney Lock along the River Welland in managing tidal and fluvial flood risk. Additional information has been provided for this flood defence in its role in protecting Spalding from coastal flooding associated with high tides and storm surge events. |

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| | | Paragraph 4.3.6 of the FRA provides detail on how Marsh Road Sluice controls tidal water levels for the River Welland.<br><br>Paragraph 4.3.7 to 4.3.9 of the FRA provides additional detail on the tidal flood defences between Fulney Lock/Marsh Road Sluice and Fosdyke, as well as how tidal flood risk is managed by coastal flood defences along the Wash Frontage to reduce flood risk.<br><br>Paragraph 4.3.11 has also been expanded to include details on the tidal flood defences along the River Nene, and how these flood defences reduce flood risk to the surrounding area.<br><br>**ES Appendix 11-3: Annex D, Figure 1-6** (Doc Ref. 6.3 Rev 2) identifies and maps the relevant tidal and fluvial flood defences associated with the River Welland and near the Wash, providing detail on the type of flood defences that are present along the River Welland and the Wash. |
| | • Explicit identification of all modelling used, including defended and undefended scenarios | Paragraph 5.3.5 onwards of the revised **FRA** (Doc Ref. 6.3 Rev 2) provides a summary of the hydraulic models that were used to inform the flood risk assessment. The Applicant has undertaken detailed modelling for the River Welland, the South Holland Main Drain and |

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| | | reviewed the existing hydraulic model for the Postland Pumped Catchment. The Applicant has also reviewed the hydraulic model report and flood extents for the River Nene, with all models accounting for current climate change allowances.<br><br>Table 5-8 of the revised **FRA** (Doc Ref. 6.3 Rev 2) also provides a summary of hydraulic models and results for the Solar Development Area, setting out the worst-case model extent scenario, embedded mitigation, impact on-site and off-site with the Scheme for each hydraulic model.<br><br>Paragraph 5.6.13 provides an explanation of the tidal boundary conditions at Fosdyke Bridge used in the hydraulic modelling of the River Welland, including the conservative 1.1m climate change allowance, and demonstrates that the peak river levels at the Site are largely insensitive to changes in the tidal boundary. It therefore concludes that tidal flood risk from the River Welland is considered minimal, with fluvial flooding representing the primary source of flood risk.<br><br>The River Nene was also assessed to inform the flood risk to the Scheme. Modelling was undertaken by the EA in 2011 for a range of scenarios to assess flood hazards, depths and velocities for each breach event, |

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| | | and overtopping with no breach (see Plate 5-14 within the **FRA** (Doc Ref. 6.3 Rev 2)). Results of overtopping using the updated 2016 hydraulic model from the EA show that the flood extent of the River Nene would not extend out into the flood channel far enough to impact the Scheme. |
| | • Assessment of residual risk associated with defence overtopping and breach, and how this influences site layout and design | Paragraph 5.3.128 of the revised **FRA** (Doc Ref. 6.3 Rev 2) concludes that the Scheme is not at risk of tidal flooding, or from a breach or overtopping of the River Nene Defences in Wisbech, taking into account current climate change allowances and agreed worst case modelled scenarios.<br><br>The Applicant has considered residual flood risk associated with the flood defence failure of the River Welland through hydraulic modelling undertaken for the River Welland breach assessment. Four breach locations along the Crowland-Cowbit Washes embankment were modelled to determine the flood risk on the Proposed Infrastructure, with the suitability of these locations confirmed by the EA during a meeting on 25 July 2025. Paragraph 5.3.44 48, and paragraphs 5.3.51 to 5.3.72 of the revised **FRA** (Doc Ref. 6.3 Rev 2) provides further details of the breach modelling results, including potential impacts on the Scheme, the |

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| | | proposed mitigation measures and the quantitative assessment of the residual flood risk. The assessment therefore adopts a conservative approach to ensure the potential impacts of a flood defence breach are appropriately considered within the flood risk assessment.<br><br>Paragraph 5.6.13 concludes that tidal flood risk from the River Welland is considered minimal, with fluvial flooding representing the primary source of flood risk. |
| | • Correction of inaccurate statements (e.g. confirming that the Grid Connection Route may be at tidal flood risk under undefended or extreme conditions). | Paragraph 11.6.36 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) has been updated to include a description of the tidal flood defences along the River Welland and to state the tidal flood risk of the Scheme is reduced by the presence of these flood defences, and there is a low residual tidal risk from the River Welland if the lock or flood defences were to fail or overtop. The **FRA** (Doc Ref. 6.3 Rev 2) has also been updated to reflect this. |
| **EA11**<br>Climate change allowances | Inconsistent approach to sensitivity testing for climate change. The H++ sea level rise scenario has been correctly used as a sensitivity test in accordance with guidance to consider a credible maximum scenario. However there is | The Applicant confirms the EA agreed, during pre-application engagement, that the breach assessment for the River Welland should be undertaken using the 0.1% Annual Exceedance Probability (AEP) event with the Higher Central climate change allowance (28%) for the |

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| | no equivalent assessment of a credible maximum scenario for peak river flows .<br>Risk of underestimation of future fluvial flood risk (eg.flood extents, depths and hazard ) under more extreme climate change conditions . This may influence the site layout, mitigation measures and the scheme's overall resilience to flooding.<br>Update the FRA with a consistent approach to climate change allowances across tidal and fluvial sources of flood risk. A credible maximum scenario for peak river flows should be assessed using the upper end climate change allowance. The assessment should be used as a sensitivity test to inform the sequential approach, site layout, and mitigation strategy, ensuring that the development is resilient to a wide range of plausible future conditions. | maximum flood event; effectively the Credible Maximum Scenario event.<br>In addition, the **FRA** (Doc Ref. 6.3 Rev 2) considers the 0.1% AEP event plus climate change for the South Holland Main Drain and Postland Catchment. In light of this requirement for the River Welland, and to ensure consistency in the assessment methodology, the Applicant considered it appropriate to apply the Higher Central climate change allowance to the South Holland Main Drain and the Postland Catchment assessments. This approach is consistent with the methodology agreed with the EA for the River Welland assessment.<br>The Applicant considers that the adoption of the Higher Central climate change allowance across all hydraulic models provides a robust and proportionate basis for assessing the maximum credible scenario for flood risk to the Scheme. The assessment therefore adopts a conservative approach, ensuring that the potential impacts of peak river flows are considered using consistent assumptions across the principal flood sources relevant to the Scheme. |
| | The proposal includes development within Flood Zone 3b (functional floodplain), which is contrary to national policy as set out in EN-1 National Policy Statement (NPS) | Paragraph 6.3.5 of the **FRA** (Doc Ref 6.3 Rev 2) has been updated to more clearly set out why Flood Zone 3b cannot be avoided in the Gotts catchment. In |

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| **EA12**<br>Development in flood zone 3b | paragraph 5.8.4. This policy states that energy projects should not normally be consented within Flood Zone 3b unless there are overriding operational reasons, and only where it can be demonstrated that the development will not result in a net loss of floodplain storage or impede flood flows. The primary mitigation proposed is the provision of a 600mm freeboard. This approach does not fully address the requirement to preserve floodplain storage and ensure flood flow routes are maintained.<br>Risks of reduced flood storage and obstruction of natural flood flows. This can increase flood risk elsewhere, alter flow paths, and exacerbate flood depths and velocities during flood events. The reliance on the 600mm freeboard alone does not mitigate these and may result in non-compliance with national planning policy.<br>The FRA should be revised to demonstrate full compliance with national policy. This should include:<br>• A clear justification for why infrastructure must be located within the functional floodplain, including any operational constraints | summary, it has not possible to locate proposed infrastructure outside of Flood Zone 3b without either acquiring additional land (noting surrounding land north of South Holland Main Drain is also within Flood Zone 3b) or removing these land parcels from the Solar Development Area altogether, which would reduce the generating capacity of the Scheme.<br>The **FRA** (Doc Ref 6.3 Rev 2) also explains that there are no clear overland flow paths, reflective of the flat topography, with accordingly low velocities. Solar stations and solar PV panels will not impede floodplain function or create blockage risks or obtain damage from such low flows. The **FRA** (Doc Ref 6.3 Rev 2) also provides an assessment of the impact on floodplain storage, demonstrating an overall non-material change in flood risk.<br>The assessment is considered to satisfy Paragraph 5.8.12 of NPS EN-1[37]. |

[37] DESNZ (2025) Overarching National Policy Statement for Energy (EN-1) Available at: https://assets.publishing.service.gov.uk/media/695d1015f41883f4e50ed9ab/overarching-national-policy-statement-for-energy-en-1-web-accessible.pdf [Accessed 23/07/2026]

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| | • Quantitative assessment of floodplain storage loss and demonstration of how this will be avoided or fully compensated (e.g. through level-for-level, volume-for-volume compensatory storage) | The solar panel mounting infrastructure and six proposed solar stations within the Flood Zone 3b extents of the South Holland Main Drain, in the Gotts catchment, result in a localised increase in flood depth within Flood Zone 3b of less than 1 mm. The increase is limited in spatial extent and occurs entirely within the functional floodplain, where floodplain storage and conveyance continue to be maintained. The Applicant considers that an increase in flood depth of this magnitude is not hydraulically material. |
| | • Hydraulic assessment to demonstrate that the development will not impede flood flows or increase flood risk elsewhere | The Applicant considers that post-Scheme increase in flood depth of this magnitude is not hydraulically material. The predicted change is substantially smaller than the uncertainties inherent within two-dimensional hydraulic modelling, including those associated with terrain data, roughness parameters and calibration. Furthermore, the change does not result in a discernible alteration to flood extents, flow routes, flood hazard classification or the overall function of the floodplain. This increase is non-significant and will not materially increase flood risk elsewhere.<br><br>The assessment of surface water risk and flow paths within paragraph 5.3.90 and Plate 5-7 of the revised **FRA** (Doc Ref 6.3 Rev 2) conclude velocities across the |

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| | | Gotts catchment, where infrastructure sits in Flood Zone 3b, are low (less than 0.25m/s). With the flat nature of the land parcel, it is reasonable to conclude flow velocities from inundation from the South Holland Main Drain will also be low. The PV panels and solar stations are set well back from the bank of the watercourse, in areas where velocities would reasonably be lower, therefore, not impeding or impacting floodplain function.<br><br>The overall post-Scheme flood depth assessment was carried out and discussed in paragraphs starting from 5.3.60 in the **FRA** (Doc Ref 6.3 Rev 2). The review of site levels confirms no impact to high risk receptors, a maximum depth increase of up to 0.1m is retained within one agricultural field which already floods during a breach event. No other locations showing a depth increase are near to a high risk receptor, i.e. the areas are located in field areas and woodland areas. Therefore, there is no material increase in flood risk to properties or roads as a result of the River Welland breach scenario catchment, or from infrastructure within the Flood Zone 3b and 3a within the Gotts Catchment. |

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| | • Consideration of alternative site layouts to avoid Flood Zone 3b wherever possible, in line with the sequential approach, with clear evidence of this provided within the FRA<br>Additional<br>While freeboard can provide a degree of resilience to flooding for information specific assets, it does not address the wider functional role of Flood Zone 3b as active floodplain. National policy places strict controls on development in these areas due to their importance in storing and conveying floodwaters. | Section 6 of the **FRA** (Doc Ref 6.3 Rev 2) describes the Site selection process for the Scheme. Hydraulic modelling of the River Welland, Postland Pumped Catchment and South Holland Main Drain has informed the layout of the Scheme, with critical infrastructure located outside of Flood Zone 3b extent wherever feasible. Within the Postland Pumped Catchment, all infrastructure has been located outside of the Flood Zone 3b flood extents, other than some of the Solar PV panels. Solar stations and substations located within this catchment area are designed with mitigation that accounts for the River Welland breach scenario, ensuring flood risk to the Scheme is appropriately managed.<br>Other than 6 solar stations in the Gotts Catchment, all solar stations have also been located outside of Flood Zone 3b flood extents in the South Holland Main Drain Catchment. It has not been possible to locate the 6 solar stations outside of the Flood Zone 3b extent of the Gotts Catchment without either acquiring additional land (noting surrounding land is also within Flood Zone 3b) or removing these land parcels from the Solar Development Area altogether, which would reduce the generating capacity and viability of the Scheme. Paragraph 6.3.5 in the **FRA** (Doc Ref. 6.3 Rev 2) states |

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| | | that solar stations must be located close to the solar PV panels. Within Land Parcels D-1-02, D-1-02, and D-1-03 of the Gotts catchment, almost all available land lies within Flood Zone 3b. The flood extent of land outside of Flood Zone 3b within the Gotts catchment is limited in both size and configuration and is insufficient to accommodate a solar station within a practical distance to the solar PV panels. Solar stations are required to serve defined areas of solar arrays and therefore need to be positioned centrally within their respective electrical catchments to minimise underground cable lengths, reduce electrical losses, maintain acceptable voltage drop and optimise operational efficiency. Relocating these solar stations outside Flood Zone 3b may result in longer cable routes, increased trenching, additional watercourse crossings and greater construction impacts. Such changes would introduce additional environmental effects and reduce the overall efficiency and deliverability of the Scheme.<br><br>The layout of the Scheme has been partly informed by the results of the hydraulic modelling undertaken which has identified areas of higher flood risk and informed the positioning of critical infrastructure to avoid Flood Zone 3b where practicable. |

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| | | The design approach discussed above is captured within Principle 7 of the **Design Approach Document** [APP-268] within paragraph 7.1.8. |
| **EA13**<br>Exception Test | Failure to properly apply and evidence the Exception Test. There is no clear evidence to show that attempts have been made to explore an overall reduction in flood risk, as required by the Exception Test wherever possible.<br>Risk that the development is not compliant with policy.<br>The FRA should be updated to provide a robust and policy- compliant application of the Exception Test. This should include:<br>• Evidence demonstrating the exploration of options to reduce flood risk overall, such as improved floodplain function. Where it is not possible for flood risk betterment to be achieved, the reasons for this must be clearly set out within the FRA | During previous pre-application engagement with the EA, and following a meeting in July 2026, the Applicant understood that development within the Gotts catchment may be capable of being justified where the requirements of the Exception Test are satisfied, demonstrating that the infrastructure cannot reasonably be located elsewhere, 600mm freeboard is provided for solar stations, floodplain function would not be impeded and overland flow velocities would not damage or cause debris blockage.<br>The design process has sought to avoid and minimise impacts on flood risk through the layout and incorporation of flood mitigation measures, where reasonably practicable. Opportunities to provide additional floodplain compensation or further reduce flood impacts have been fully explored. However, owing to the physical constraints of the Site and the surrounding floodplain, no additional practicable measures are available that would deliver a measurable reduction in flood depths across the floodplain without |

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| | | giving rise to disproportionate engineering intervention or consequential environmental effects.<br><br>The Applicant, therefore, considers that the residual increase represents a negligible hydraulic effect that, as concluded in the **FRA** (Doc Ref 6.3 Rev 2), does not materially increase flood risk or adversely affect the operation or function of the functional floodplain. In the context of the overall assessment, the residual effect is considered to be acceptable and proportionate.<br><br>Section 5.10 of the **Planning Statement** [APP-260] summarises the application of the Sequential and Exception Tests.<br><br>There are two limbs to the Exception Test within paragraph 031 of the PPG. In response to the first limb which requires demonstrating the Scheme would provide wider sustainability benefits that outweigh flood risk, the Scheme would contribute to the UK's net zero and energy security goals at a national level as described in Section 4 of the **Planning Statement** [APP-260].<br><br>The second limb requires that essential infrastructure located in Flood Zone 3a be designed and constructed to remain operational and safe in times of flood. Where infrastructure is located within Flood Zone 3b (the |

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| | | functional floodplain), it must also result in no net loss of floodplain storage, not impede water flows and not increase flood risk elsewhere.<br><br>Within Land Parcels A, B and C, all infrastructure other than the solar PV panels are to be located outside of the Flood Zone 3b extents, with embedded mitigation included in the design to take into account a breach scenario of the River Welland.<br><br>Within Land Parcel D, there are six solar stations proposed within Flood Zone 3b associated with the Gotts Catchment. These solar stations have a functional requirement to be co-located with the solar PV panels planned within these fields. There are no alternative design scenarios in this location which would see the solar stations located outside of the functional floodplain without removal of the solar PV panels altogether, thereby materially reducing the generating capacity of the Scheme.<br><br>**ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3 Rev 2) concludes the siting of the Scheme infrastructure in the flood zone is not expected to result in any material or measurable loss of floodplain storage, nor any material change to flood depths or floodplain |

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| | | hydraulics. On this basis, no additional flood mitigation or compensation is required.<br><br>Taking into account the above, it is considered the Scheme meets the second limb of the Exception Test as the embedded design measures demonstrate development will be safe for its lifetime taking account the vulnerability of its users, without materially increasing flood risk elsewhere. |
| **EA14**<br>Impact of flood bunding | A considerable amount of bunding is proposed around infrastructure located within the floodplain. The extent, layout, and function of these bunded areas are not clearly defined making it difficult to assess any cumulative impact. Limited consideration has been given regarding whether compensatory storage or greater flood storage provision would be appropriate given the scale and number of bunded areas. Maintenance requirements and long-term performance of the bunds are not addressed.<br><br>Risk of cumulative impacts creating an increase flood risk elsewhere (or exacerbate localised drainage complexities) through the displacement of floodwater and alteration of flow paths. Without clear maintenance arrangements, the long-term effectiveness of the bunds cannot be assured, potentially leading to increased risk over the development lifetime. | Paragraphs 5.3.26, 5.3.52 to 5.3.59, Table 5-5, Table 5-8 and Section 8 of the revised **FRA** (Doc Ref. 6.3 Rev 2) identify where bunding or a flood defence wall would be required to protect the Scheme's infrastructure, the worst-case flood event against which the flood protection requirements have been assessed, and the associated freeboard allowances. The assessment considers the River Welland breach scenario and Postland catchment (both 0.1% AEP + 28% climate change) and the South Holland Main Drain 0.1% AEP + 13% climate change pump failure scenario, as agreed with the EA on the 25 July 2025 as the worst-case scenarios.<br><br>Bunding (or a flood defence wall) is proposed for On-Site Substations in Parcels A, B and C, BESS compound, selected solar stations and CSEC South to manage |

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| | The FRA should be updated to provide a clearer and more comprehensive assessment of bunding proposals. This should include:<br>• A quantified and mapped extent of all proposed infrastructure, clearly shown on plans (including solar stations, substations, and associated infrastructure) | residual flood risk associated with the assessed flood events.<br><br>Paragraph 5.3.55 of the revised **FRA** (Doc Ref. 6.3 Rev 2) and Figure 1-5 in **ES Appendix 11-3: Flood Risk Assessment - Annex D** (Doc Ref. 6.3 Rev 2) identify the locations where bunding or a flood defence wall is required for solar stations, whilst paragraph 5.3.57 identifies the On-Site Substations located within the River Welland breach flood extent that will require bunding or a flood defence wall. It is noted that the locations of solar stations within Work No 1 area are not fixed, as such Figure 1-5 in **Annex D** (Doc Ref. 6.3 Rev 2) indicates areas where bunding or a flood defence wall would be required, if a solar station was to be placed in these areas.<br><br>Paragraph 5.3.58 sets out the approach used to determine the required bund or flood defence wall heights, including the provision of 300 mm freeboard. For the River Welland, the bunding requirements relate to the residual risk associated with the 0.1% AEP plus 28% climate change River Welland breach scenario, as agreed with the EA. The River Welland breach model flood extent and depths exceed the equivalent values of the 0.1% AEP plus 28% of the Postland model in Land Parcels A, B and C. For Land Parcel D, bunding |

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| | | requirements have been assessed against the South Holland Main Drain 0.1% AEP plus 13% climate change pump failure event. As such, the required bund or flood defence wall height is calculated at detailed design by combining the ground level at the infrastructure location from the topographical survey, the maximum flood depth at that location and the required freeboard. This is set out and secured through the **Design Parameters** (Doc Ref. 7.4 Rev 2). |
| | • An assessment of the cumulative impact of bunding on floodplain storage and flow conveyance, including consideration of whether compensatory storage or enhanced flood storage provision is required, even in defended or breach scenarios | Hydraulic modelling completed for the Scheme considered bunding around the On-Site Substations and all Solar Stations for a worst-case assessment (see modelling assumptions in **FRA Annex B** [APP-224]), using the maximum bund width. As such, the depth change volume assessment reported in the **FRA** (Doc Ref. 6.3 Rev 2) accounts for the possible worst-case bunding, whilst in practice some of the Solar Stations can also be raised on plinths instead. The flood depth change assessment demonstrates that the change is minimal and results in no significant effects. The **FRA** (Doc Ref. 6.3 Rev 2) has been updated to provide additional discussion on the assessment of impacts on flood risk from the proposed bunds. |

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| | • Detailed design information for bunds, including crest levels, relationship to design flood levels, and freeboard allowances, clarifying whether infrastructure is raised above flood levels or relies on bund protection<br>• Consideration of opportunities to optimise bunding and freeboard requirements, potentially reducing the extent of earthworks through design refinement<br>• A clear maintenance and inspection strategy to ensure that bunds remain effective throughout the development lifetime | Detailed design information of the bunds, including the height of bunds, opportunities to optimise bunding, inspection requirements and long-term maintenance arrangements, will be developed during the detailed design stage post-DCO consent. The commitment for inspection requirements and long-term maintenance arrangements to be set out has been included within the **OOEMP** (Doc Ref. 7.11 Rev 1) at Deadline 1. |
| | • Integration of these considerations into the wider FRA narrative, ensuring consistency with modelling outputs and the requirements of the Exception Test.<br>Additional<br>We acknowledge that floodplain compensation is not typically information required behind defences or within breach extents, however the scale and number of bunded areas proposed warrant further consideration of their cumulative effect. Although some of these aspects appear to have been considered within the modelling, they are not fully discussed within the FRA. | The **FRA** (Doc Ref. 6.3 Rev 2) has been updated to provide additional discussion on the assessment of impacts on flood risk from the proposed bunds, as set out in rows above. It is also noted that the solar stations within Flood Zone 3b of Gotts catchment would be raised on plinths rather than require bunding. |
| Hydraulic Modelling | | |

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| **EA15**<br>Lack of clarity regarding volume loss calculations | Design event used for volume loss calculations is unclear<br>Lack of clarity regarding flood risk impacts<br>Provide clarity in Table 5-2 regarding which scenario has been used to determine the volume loss and depth increase calculations, for example, breach, defended, pump failure etc along with which annual exceedance probability scenario has been used.<br>It is not clear which scenario the calculations in this table reflect. For example, is this a breach scenario (residual flood risk) on the River Welland for the 0.1% plus 28% climate change scenario and defended scenario for the Postland Catchment and South Holland Main Drain or pump failure scenarios. This should be made explicitly clear in the table | Table 5-2 of the **FRA** (Doc Ref 6.3 Rev 2) has been updated to clarify the modelled event used in the volume loss calculations to confirm the Welland breach scenario has been used in the assessment, and the South Holland Main Drain and Postland models. The South Holland Main Drain and Postland models have no defences, so comprise undefended model scenarios.<br>Additionally, Table 5-8 has been included within the **FRA** (Doc Ref 6.3 Rev 2) which summarises the detailed hydraulic modelling undertaken for each watercourse and sets out the worst case impacts of each hydraulic model scenario for the River Welland, Postland and South Holland Main Drain catchments, on the Solar Development Area Land Parcels, alongside the mitigation requirements to ensure infrastructure will remain operational in times of flood.<br>Furthermore, paragraph 5.3.7 of the revised **FRA** (Doc Ref 6.3 Rev 2) includes a summary of the modelling parameters, that has informed the detailed assessment of flood risk and floodplain compensation assessment. Plate 5-2 in the revised **FRA** (Doc Ref 6.3 Rev 2) indicates the fluvial catchment areas that have been modelled. |

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| **EA16**<br>Flood defence standard of protection | Conflicting information with respect to flood defence standard of protection<br>Lack of clarity regarding standard of protection for the River Welland defences<br>Please ensure that standard of protection (SOP) is consistently reported as different SOPs are reported for the Welland in different paragraphs of the FRA which is confusing to the reader<br>Whilst it is appreciated that there are varying standards of protection along the Welland the information presented requires clarification. For example, paragraph 5.4.18 states that the proposed solar PV modules benefit from existing flood defences along the River Welland which defend against a 1% AEP plus 28% climate change event. Paragraph 5.4.20 then goes onto state that the flood defences only provide protection up to a 1 in 100-year event. | The **FRA** (Doc Ref 6.3 Rev 2) has been reviewed and updated to ensure that the level of protection provided by the River Welland flood defences is described consistently throughout the report. |
| **EA17**<br>Bund wall heights | Design event scenario for bund wall heights in table 5-4 is not clear<br>Mitigation could be inappropriate<br>Please make it explicitly clear in table 5-4 and paragraph 5.4.29 which scenario has been used to inform the bund wall heights | Tabel 5-4, which is now Table 5-5 in the revised **FRA** (Doc Ref 6.3 Rev 2), has been updated to clarify that the modelled event used to calculate the required bund or flood defence wall heights for the On-Site Substations and BESS Compound is the breach scenario of the River Welland, for the 0.1% AEP plus 28% CC event. |

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| | This paragraph suggests the proposed bund or wall heights include a 0.3m freeboard. It is not clear what modelled flood scenario has been used to inform the heights, for example is this a River Welland Breach for the 0.1% (1 in 1000) annual exceedance probability scenario plus 28% climate change? This should be made explicitly clear in the text. | Paragraph 5.4.29 is now paragraph 5.3.58 in the revised **FRA** (Doc Ref 6.3 Rev 2), and has also been updated to clarify the modelled scenario that the calculations are based upon (as above).<br>Additionally, within the revised **FRA** (Doc Ref 6.3 Rev 2), Table 5-8 has been included, that summarises the detailed hydraulic modelling undertaken for each watercourse, and sets out the worst case impacts of each model on the Solar Development Area Land Parcels, alongside the mitigation requirements to ensure infrastructure will remain operational in times of flood. |
| **EA18**<br>Assessment of volume losses for the Gotts Catchment | It is not clear whether solar PV support panels are included in the assessment of volume losses for the Gotts Catchment<br>Flood risk impacts could be underestimated<br>Please assess the panel leg volume losses for solar PV panels in Flood Zone 3b as shown in plate 5-5<br>This section notes that each solar station has a footprint of approximately 56m2 resulting in a combined total base area of 336m2 for the six solar stations. The map in plate 5.5 shows solar stations in Flood Zone 3b. The pink outline shows the extent of Flood Zone 3b and the blue polygons are presumably the solar panel areas. In addition to the solar stations the area of solar panels (blue | The Applicant confirms the Scheme has assessed solar PV panel leg impacts across all four Land Parcels in the Solar Development Area.<br>Table 5-1 has been updated in the **FRA** (Doc Ref 6.3 Rev 2) to include estimated panel densities for all four Land Parcels, and paragraphs 5.3.29 to 5.3.31 have been amended to reflect panel legs covering all four of the Land Parcels. Table 5-2 in the **FRA** (Doc Ref 6.3 Rev 2) has been clarified within the response to EA15 to include the relevant modelled event the calculations are based upon. The title of Table 5-2 has been amended to note "Volume loss calculations for the solar panel legs". |

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| | polygons) which intersect Flood Zone 3b as shown in plate 5.5 is around 250,000 m2. The applicant should also assess the panel leg volume lost within Flood Zone 3b in this location and demonstrate how the development is compliant with paragraph 5.8.12 within the Overarching National Policy Statement for Energy (EN-1) which states that there should be no net loss of floodplain storage and any constriction of flood flow routes should be safely managed within the site. | Solar panel legs specifically within Parcel D Gotts catchment result in a depth increase of up to 0.0002m (0.2mm). The **FRA** (Doc Ref 6.3 Rev 2) demonstrates that, even with potentially significant flood depths, solar panel legs have no material impact on floodplain volume across the Solar Development Area, as agreed by the EA during pre-application engagement. With the panel density in Land Parcel D less than that of Land Parcel A, it is considered Gotts by itself will not be materially impacted by solar PV panel legs.<br><br>It is noted that the hydraulic modelling undertaken has assessed panel legs volumes across all Land Parcels within the models, from the River Welland breach scenario and the Postland and South Holland Main Drain flood depths. |
| **EA19**<br>Mitigation measures for solar PV panels | Conflicting information with regards to mitigation<br>Difficult to appraise mitigation measures<br>Please ensure consistency in reporting with regards to mitigation for the solar stations<br>Paragraph 5.4.57 is confusing as this talks about the Solar PV panels and then that the solar stations do not require mitigation, however, the preceding paragraph (5.4.56) talks about raising the solar station plinths which is a form | Paragraphs 5.3.86 and 5.3.87 of the **FRA** (Doc Ref 6.3 Rev 2) have been updated to clarify that, for any solar stations located in an area where flood depths are less than 0.5m, the proposed raising of the solar station plinths provides sufficient mitigation and no additional bunding or flood wall mitigation is required. The sentence stating that the solar stations require no mitigation has been removed. |

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| | of mitigation. Paragraph 5.4.59 then goes onto talk about 0.6 metres of freeboard for the solar stations | |
| **EA20**<br>Assessment of Credible maximum tidal scenario | A credible maximum tidal scenario (H++) has not been assessed in line with guidance<br>Flood risk impacts could be underestimated for a credible maximum tidal scenario<br>The applicant should either apply an H++ climate change scenario in accordance with Flood risk assessments: climate change allowances (GOV.UK), or robustly justify their chosen approach, demonstrating that it appropriately represents a credible maximum (H++) tidal scenario.<br>Sections 5.7.6 to 5.7.25 provide details on the H++ scenario for sea level rise, however, the approach does not align with the approach for assessing a credible maximum scenario (H++) in the context of tidal flood risk described in the guidance on using climate change allowances for Flood Risk Assessment. The approach for assessing a credible maximum (H++) scenario for sea level rise is to apply 1.9 metres of sea level rise including an additional 2mm per year to account for storm surge. Further details on the approach for assessing a tidal H++ scenario can be found at Flood risk assessments: climate change allowances - GOV.UK 4. Groundwater and Contaminated Land | A sensitivity analysis for the Credible Maximum Tidal Scenario (H++) has been undertaken to assess the H++ allowance (1.90 m sea level rise to 2100) alongside an additional 2 mm/year storm surge allowance starting from 2017. The sensitivity analysis was carried out on the tidally influenced River Welland Breach Model and the South Holland Main Drain Model.<br>***River Welland Breach Model***<br>• *Methodology* - The downstream tidal boundary for the present-day 1.0% and 0.1% AEP events and the 1.0% and 0.1% AEP + CC (2115 horizon) events were extracted from the EA's MIKE 11 model. The present-day levels were compared against the climate change scenario levels to determine the climate change impact already within the model , establishing an existing baseline uplift. The existing baseline uplift was deducted from the cumulative target 1.90 m H++ sea level rise allowance and total storm surge allowance from 2017 to 2100 to determine the additional uplift to be applied to the 2115 horizon climate change downstream |

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| | | levels to derive the downstream H++ tidal boundary level. The derived H++ downstream level was then used to extrapolate the (H++) water levels at key locations relative to the site, i.e., at the upstream and downstream extent of the water storage area between the inner and outer embankment on the River Welland.<br>• *Results* - Under the H++ scenario (1.0% AEP + CC and 0.1% AEP + CC), peak water levels in the river adjacent to the site reach up to 4.96 m AOD.<br>• *Defences and Freeboard* - While the inner embankment along the river is overtopped into adjacent Water Storage Area, the outer embankment (minimum crest level 5.27 m AOD) maintains a minimum freeboard of 0.31 m (310 mm). Therefore, the outer embankment is not overtopped during the H++ credible maximum scenario, and the baseline breach scenario remains the critical worst-case flood mechanism for the site.<br>***South Holland Main Drain***<br>• *Methodology* - A sensitivity analysis evaluating a +0.50m increase on the downstream tidal |

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| | | boundary for the joint 0.1% AEP + climate change was undertaken as part of the initial modelling. This represented a 1.60 m sea level rise allowance (i.e., the 1.10 m sea level rise from the joint 0.1% AEP climate change + 0.50 m). To determine the target H++ allowance, an additional uplift was applied to the +0.50 scenario downstream level to achieve the cumulative 1.90 m H++ sea level rise allowance alongside the total storm surge allowance from 2017 to 2100. The derived downstream H++ allowance was used to extrapolate peak flood levels across all three internal pumped catchments under pump failure conditions.<br>• *Results* - Peak water levels increase by +0.092 m in the Fleet Fen catchment (max flood depth up to 0.50 m within the site) and by +0.291 m in Gotts catchment (max flood depths up to 0.80 m with the site). Water levels in the Wiseman catchment remain unchanged as they are governed by internal catchment dynamics.<br>• *Infrastructure Protection* - Solar PV modules will be elevated to a minimum of 0.80 m above ground level, and solar stations/substations will be protected by flood bunds or raised (up to 1.35 |

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| | | m above ground in Land Parcel D1). All critical infrastructure remains elevated above peak H++ flood levels.<br>The H++ sensitivity analysis confirms that the proposed development and its embedded mitigation measures provide sufficient freeboard and resilience against external extreme tidal flood risk, demonstrating that flood risk impacts have not been underestimated.<br>Full methodology, results and analysis are provided in H++ Sensitivity Analysis technical note. |
| Groundwater and Contaminated Land | | |
| **EA21**<br>Contaminated Land Assessment | This chapter is supported by APP-174 ES Appendix 5-4: Contaminated Land Assessment and APP-175 ES Appendix 5-5: Contaminated Land Assessment for Grid Corridor Extension. The conclusions of these reports have not been noted or referenced within chapter 5.<br>Information regarding land contamination could be omitted from the Environmental Statement<br>Ensure any conclusions in the Environmental Statement are supported by reference to relevant information from Appendix 5-4 and 5-5. | As explained within Table 5-1 of **ES Chapter 5: Agriculture and Soils** [APP-056], an assessment of likely significant effects associated with contaminated land is scoped out of the EIA on the basis that the Preliminary Risk Assessments included within **ES Appendix 5-4: Contaminated Land Assessment** [APP-174] and **ES Appendix 5-5: Contaminated Land Assessment for Grid Corridor Extension** [APP-175] demonstrate that no significant effects are likely to occur with the implementation of standard industry practice measures. Standard industry practice measures to minimise risks associated with contaminated land have been |

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| | | incorporated within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1), and **ODEMP** (Doc Ref. 7.12 Rev 1). As such, no further assessment is presented within **ES Chapter 5: Agriculture and Soils** [APP-056]. |
| **EA22**<br>Risk to groundwater from trenchless crossings | The mitigation measures for trenchless crossings do not consider risks to groundwater.<br>Risk of pollution of the secondary A aquifer beneath the site.<br>Update the OCEMP to include groundwater as a receptor during the installation of trenchless crossings. The design of trenchless crossings beneath surface water bodies should be based on water feature surveys and Hydrogeological Risk Assessments, to ensure that drilling fluids would not pose a significant risk to controlled waters. These should be secured within the Outline Construction Environmental Management Plan. | Table 3-7 of **OCEMP** (Doc Ref. 7.10 Rev 2) has been updated to reference groundwater as a receptor for potential impacts from trenchless crossing construction.<br>However, as summarised within Table 11-1 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) and within **ES Appendix 1-2: EIA Scoping Opinion** [APP-167], Table 3.4 ID Ref 3.4.1, the Planning Inspectorate agreed that groundwater aquifers were to be scoped out of further assessment in the ES due to the presence of unproductive superficial and bedrock strata. The MAGIC aquifer classification map shows Secondary Undifferentiated Aquifer below the Site between Crowland and Holbeach Drove. Also, Secondary A Aquifer associated with the River Welland is located west of the Scheme. The bedrock is still classified as Unproductive Strata. This is stated in paragraph 11.6.30 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). |

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| | | Trenchless crossings works will take place under the use of standard and good practice mitigation measures for minimising risk to controlled waters, which includes both surface waters and any groundwater. This is noted within Table 3-7 Hydrology and Flood Risk in **OCEMP** (Doc Ref. 7.10 Rev 2). This includes the use of guidance within CIRIA report C532: Control of water pollution from construction sites[38], CIRIA report C648 Control of water pollution from linear construction sites[39], and CIRIA report 'C736: Containment systems for the prevention of pollution[40].<br><br>Measures to manage spillage risk, during works for trenchless crossings, are also set out within Table 3-7 Hydrology and Flood Risk in **OCEMP** (Doc Ref. 7.10 Rev 2), which would minimise the risk of pollution to surface water and contaminants infiltrating to groundwater.<br><br>To minimise risks associated with drilling fluids for non-intrusive cable crossings, a Site specific Fracture Risk Assessment will be prepared, as set out within Table 3- |

[38] CIRIA (2001). C532: Control of water pollution from construction sites – Guidance for consultants and Principal Contractors.
[39] CIRIA (2006). C648: Control of water pollution from linear construction projects, technical guidance.
[40] CIRIA 736 (2014) Containment systems for the prevention of pollution.

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| | | 7 Hydrology and Flood Risk in **OCEMP** (Doc Ref. 7.10 Rev 2). This will include methodologies and mitigation required based on ground conditions to minimise the risk to groundwater and surface water. A Pre-works Hydromorphology and Riparian Survey will be carried out for each watercourse subject to a trenchless crossing, as a precautionary measure, to ensure there is a record of the channel conditions prior to the works commencing to install cables beneath the bed. |
| **EA23** Unexpected contamination protocol | The unexpected contamination protocol does not include the need to contact the Local Authority and Environment Agency in the event contamination is identified. It does not mention the need to follow our Land Contamination Risk Management (LCRM) guidance.<br>Risk of pollution to controlled waters may not be adequately assessed or controlled.<br>Update the commitment to managing unexpected contamination in the OCEMP, OOEMP and ODEMP, including reference to LCRM and consultation with Local Authority and the Environment Agency.<br>Our recommended process is as follows: 1. In the event that contaminated land, including groundwater, is found at any time when carrying out the authorised development, which was not previously identified in the environmental | The requirement to contact the Local Authority and Environment Agency and to follow Land Contamination Risk Management (LCRM) guidance in the event that contamination is identified has now been included in the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1). |

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| | statement, then no further development (unless otherwise approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the local planning authority, and where necessary, the Environment Agency, and the undertaker must complete a risk assessment of the contamination in consultation with the local planning authority, and where necessary, the Environment Agency.<br>2. Where the undertaker determines that remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by the local planning authority, following consultation with the Environment Agency.<br>3. Remediation must be carried out in accordance with the approved scheme under sub paragraph (2).<br>4. Following the implementation of the remediation strategy approved under sub-paragraph (2), a verification report, based on the data collected as part of the remediation strategy and demonstrating the completion of the remediation measures must be produced and supplied to the relevant planning authority and the Environment Agency. | |

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| Ecology and Fisheries | | |
| **EA24**<br>Omission of fisheries legislation | The Salmon and Freshwater Fisheries Act 1975 and The Eels (England and Wales) Regulations 2009 have not been included in the list of legislation that is relevant to biodiversity. The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 has not been included.<br>Risk that the impacts on fish from the construction, operation and decommissioning have not been fully considered. Risk that an assessment on whether the proposal will cause deterioration to WFD status or prevent a waterbody achieving Good status has not been considered.<br>Include reference to this legislation. | **ES Appendix 9-1: Ecology Legislation, Policy and Guidance** (Doc Ref. 6.3 Rev 1) has been updated to include this legislation and the requirements of these legislation have been considered as part of the impact assessment presented within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) and **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1). |
| **EA25**<br>No fish surveys undertaken | No fish surveys were undertaken to support the ecological baseline assessment. This lack of surveys is not mentioned in the listed limitations of the EIA<br>No fish surveys have been completed and therefore there is no accurate understanding of the fish baseline in watercourses/waterbodies within the draft order limits.<br>Include the lack of fish surveys in the limitations of the EIA. | The lack of fish surveys has been included within the limitations section of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1), with confirmation as to the decision process for this. The absence of fish surveys, however, is not considered to affect the assessment findings. The majority of ditches are associated with arable fields, are controlled by a sluice, and include large numbers which were dry at the time of assessment. **ES Appendix 2-1: Watercourse Crossing Schedule** (Doc Ref. 6.3 Rev 1) has been updated for |

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| | | Deadline 1 to note which watercourses, where crossings are proposed, are assumed to be permanently wet or seasonally wet based on survey information, to provide an indication of their potential for fish habitat. |
| **EA26**<br>Fish scoped out of EIA | We are not satisfied that fish can be scoped out on the basis that potential impacts have been addressed with embedded mitigation in the oCEMP. We do not agree with this approach. The assumption that fish are not present within the draft order limits is un-evidenced, and the mitigation for open-cut trenching and culverting is insufficient. No appraisal of the watercourse and waterbodies on site has been provided.<br>Risk of impacts to fish from in channel and open-cut works .<br>Where in-channel works are proposed a thorough understanding of the aquatic ecology and fish baseline is required. Fish surveys may be required to inform the design of appropriate mitigation. This was flagged at EIA scoping and PEIR and has not been sufficiently addressed.<br>APP-205 ES Appendix 9-2: Preliminary Ecology Appraisal Report, Photograph 30 Sly's Connection. APP-075 Watercourse Crossings Locations Sheet 11 This waterbody appears to be permanently wet and appears to correlate with crossing location 50 which is proposed for open cut culverting. A fish survey should be completed in | **ES Appendix 2-1: Watercourse Crossing Schedule** (Doc Ref. 6.3 Rev 1) has been updated for Deadline 1 to note which watercourses, where crossings are proposed, are assumed to be permanently wet or seasonally wet based on survey information, to provide an indication of their potential for fish habitat. Where permanently wet watercourses are identified, the schedule has been updated to indicate where a clear span solution is proposed instead of a culvert, subject to detailed design.<br>**ES Appendix 2-1** (Doc Ref. 6.3 Rev 1) demonstrates that most drains / ditches where watercourse crossings are proposed only had low or no levels of water present during surveys (i.e. are assessed to be only seasonally wet), and as such, would be of limited value/use by fish. Where water is permanently present, pollution prevention measures and timing of works (to avoid spawning periods) will be considered for detailed design, as set out within the **OCEMP** (Doc Ref. 7.10 Rev 2). Where culverts are proposed as part of the |

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| | order to inform potential impact and thus mitigation design. If the applicant does not undertake a fish survey then further justification and evidence is required to support this decision. | watercourses crossings, these will not prevent continued movement upon completion of works with details to be provided with detailed design, as secured through the **OCEMP** (Doc Ref. 7.10 Rev 2).<br><br>The **OCEMP** (Doc Ref. 7.10 Rev 2) has been also been updated to include a firmer commitment to clear span structures, Pipe culverts for access road crossings will typically only be appropriate on small, seasonally dry channels. On permanently wet watercourses, clear span structures will be used, except where the crossing forms part of a bellmouth access or where an alternative crossing solution is justified through the detailed design process. In such cases, it must be demonstrated that there would be no significant adverse effects on fish. The Environment Agency would be consulted as part of the detailed design process, and suitable mitigation measures incorporated into the crossing design.<br><br>There are no watercourse crossings proposed across Slys Connection Local Wildlife Site (LWS) (watercourse crossing 50 is not located on Slys Connection), whilst works on South Holland Drain West LWS are to an existing bridge only, which may comprise works to or the replacement of the existing bridge. Measures to mitigate effects from these works with regards to |

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| | | pollution prevention and the timing of works are secured through the **OCEMP** (Doc Ref. 7.10 Rev 2).<br>The assessment presented within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) has been updated and is considered sufficient to inform the identification of mitigation requirements and likely significant effects within the ES. |
| **EA27**<br>Fragmentation/ barriers to dispersal | Fish are not mentioned as a potential receptor to impacts from fragmentation/ barriers to dispersal (eg. from culverting and open-cut trenching of watercourses).<br>Risk of disruption of dispersal patterns of fish and impacts to fish population.<br>Include this impact-pathway to fish receptors in the assessment. | As set out within the responses above, no significant effects on fish are considered likely, with the implementation of measures set out within the **OCEMP** (Doc Ref. 7.10 Rev 2). **ES Chapter 9 Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) has been updated for Deadline 1 to include fish as a potential receptor with supporting details provided to set out why no significant effects are considered likely. |
| **EA28**<br>Grid connection route | We disagree with the intention to scope out the grid connection route. The report states that open cut trenching may be used. This could create an impact pathway if used across watercourses.<br>Risk of impacts to impacts to fish and aquatic ecology and deterioration in WFD status. | **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1) (Table 3-3) has been updated at Deadline 1. This screens in the Grid Connection Route where cable undergrounding cannot be ruled out at this stage.<br>Potential impacts associated with open-cut watercourse crossings had already been provided within the WFD assessment for other cabling activities. However, this update ensures that the same construction techniques, |

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| | Scope the grid connection route into the WFD assessment and ensure impacts to fish and aquatic ecology are assessed. | where they may be required as part of the Grid Connection Route, are also expressly captured within the WFD assessment.<br>The WFD assessment had already considered qualitatively the potential impacts to fish and macroinvertebrate biological quality elements. An assessment of the potential impacts associated with undergrounding sections of the Grid Connection Route have also now been undertaken. Overall, the changes have not altered the conclusions of the WFD assessment in that it would not give rise to any deterioration in WFD status or prevent the achievement of WFD objectives. |
| **EA29**<br>Eel entrapment | There is the risk of any discharge pipes from swales to watercourses becoming an attractant for European eel, resulting in entrapment.<br>Entrapment of eel to undesirable habitat and loss of eel to the system.<br>Ensure discharge pipes are designed on such a way that excludes eel from entering. | Pipe connections from swales to watercourses have been minimised. The discharges to watercourses will be via pipe outfall; however, where possible, surface water will drain from the Solar Development Area's swale - based drainage system to local receiving watercourses via a new open green ditch. This is secured within **ES Appendix 11-4 Outline Drainage Strategy** [APP-227].<br>The design of any pipe outfalls will be confirmed at the detailed design stage, however, it is confirmed they will allow continued movement through them given they will all be open ended. As such, no significant effect as a |

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| | | result of the potential for the entrapment of eel / elvers is considered likely. Utilising a mesh or similar form of screening at pipe entrances to prevent access is not feasible as the associated mesh screen size would need to be small to prevent any eels/elvers from entering. This in turn would result in a significant increase in the maintenance requirements, as there would be an increased risk of blockages. |
| **EA30**<br>Ecological impacts of watercourse trench crossings | The construction will involve open-cut trenching to cross watercourses. Open cut methods for cabling or pipelines can destroy habitats, including those of protected species such as the water vole.<br>Disturbance to, and loss of habitat for water vole.<br>Provide further detail regarding reinstatement of bankside habitats along watercourses and ditches after completion of works. This should include sowing the bankside habitats with a species rich locally appropriate sward, and if necessary erecting fencing to prevent livestock access. | The design of the watercourse crossings will be confirmed at the detailed design stage, in accordance with the design principles and parameters secured through the **Design Parameters** (Doc Ref. 7.4 Rev 2) and **OCEMP** (Doc Ref. 7.10 Rev 2). The wording within the **OLEMP** (Doc Ref. 7.16 Rev 1) has however been reviewed and updated to include reference to sowing banksides with a species rich locally appropriate sward, and if necessary, erecting fencing to prevent livestock access during establishment. Detailed design would be subject to a Pre-works Hydromorphological and Riparian Corridor Survey of the final watercourse crossing locations, which will record channel features/habitats and provide the baseline, against which reinstatement will be designed, and further |

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| | | consultation with Internal Drainage Boards, as set out within the **OCEMP** (Doc Ref. 7.10 Rev 2).<br><br>The mitigation for water voles has been discussed and agreed in principle with Natural England as part of consultation meetings, as can be evidenced from the **Statement of Common Ground with Natural England** (Doc Ref. 8.13). |
| Geomorphology | | |
| **EA31**<br>Duration of 'temporary' works | Watercourse Temporary Crossings – Temporary is undefined thus it is unclear as to what length of time these crossings may remain in place.<br><br>Risk of longer-term impacts to the water environment, which may cause a decline in WFD status.<br><br>Unless activity is less than 6-months and any effects can also be remediated within that 6-month period, assess these activities as if they were permanent works and put in place appropriate mitigation.<br><br>The EA is a competent authority for WFD. Our internal guidance regarding WFD for low-risk activities considers short-term as being activities that are 6 months or less in duration, and where effects of those activities undertaken also last less than 6 months. Any activity/action that takes | Paragraph 11.7.16 in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) has been updated to state that temporary crossings will be in place for up to four years, the construction of which has been assessed in paragraph 11.8.5.<br><br>Mitigation has already been committed to on the design of culverts and on channel reinstatement, as set out within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) (see summary below) and secured through **OCEMP** (Table 3-7) (Doc Ref. 7.10 Rev 2).<br><br>Paragraph 11.7.19 within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) states that "*all temporary crossings will be removed after completion of* |

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| | longer or causes an effect longer than 6 months should be assessed as if it were permanent/high risk. This includes installation/removal of "temporary" access crossings. | *the construction works (up to four years) and the watercourses reinstated informed by a Pre-works Hydromorphological and Riparian Corridor Survey as discussed earlier under 'Watercourse Cable Crossings. This will seek to reinstate as found as a minimum whilst also considering opportunities for enhancement. Furthermore, during reinstatement, any subsequent improvements to the watercourse that have occurs upstream or downstream by other initiatives can be taken into account, although as this is within the construction site any changes in baseline are unlikely.*"<br><br>Table 3-4: in **ES Appendix 11-2: Water Framework Directive Report** (Doc Ref. 6.3 Rev 1) has been updated to state that temporary crossings will be in place for up to four years. **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1) includes an assessment of permanent crossings.<br><br>**ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) has been updated in paragraph 11.8.5 to specifically add the construction of temporary watercourse crossings (up to four years) to pollution risk from construction impacts. Temporary impacts on hydromorphology of watercourses during the construction phase are included in paragraph 11.8.12. Both are assessed in Tables 11-9 and 11-10. These |

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| | | impacts are not also assessed within the Operational section for Hydromorphological impacts, due to avoiding double counting of potential effects (see paragraph 11.8.52).<br>The WFD Assessment within **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1) concludes that any impacts associated with temporary and permanent crossings will be localised, mostly on minor drainage channels within the WFD water body catchments, and not significant at the WFD water body scale. The Scheme would therefore not cause deterioration in the status of any WFD water body or prevent the water bodies achieving target status noting the embedded environmental mitigation. |
| **EA32**<br>Use of pipe culverts | The proposed use of pipe culverts for temporary watercourse crossings may have a detrimental impact on the aquatic environment.<br>Potential for damage to the water environment through throttling of flows and interference in sediment movement.<br>Consider each watercourse crossing on a case-by-case basis to determine which watercourse crossing method has the least impact. Where unavoidable, pipe culverts, should be sized appropriately and allow water and | **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) and **OCEMP** (Doc Ref. 7.10 Rev 2) state where possible existing accesses will be used unmodified or slightly modified as required. Where new temporary access crossings are needed, the design of each crossing will be addressed at detailed design on a 'case by case' basis and will ensure that they are sized to not impact on flow conveyance and ensure capacity for peak flow rates. These designs will be agreed with the IDB, where required, depending upon ownership of the |

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| | sediment conveyance, without increasing velocity of flow under normal conditions. Pipe culverts should be restricted to those watercourses that are predominantly dry throughout the year.<br>Pipe culverts, if inappropriately sized, can result in chute flow under otherwise normal conditions. The resultant increased velocity of flow may increase the likelihood of scour and therefore the necessity of downstream scour protection/channel reinforcement. | asset, as managed by protective provisions within the **Draft DCO** (Doc Ref. 3.1 Rev 2).<br>An assessment for each water feature based on assumed reasonable worst-case parameters for a proposed structure is presented within Table 11-9 and Table 11-10 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). A pipe culvert was assumed given the desire to be able to easily remove the structure following completion of construction works. However, as mentioned above, flexibility is retained in the DCO for both clear-span or culvert structures, with the latter not necessarily a pipe.<br>The majority of watercourses are low grade, low gradient and gently flowing managed drains with limited erosion and sediment transport potential. As a result of these hydromorphological characteristics there is limited potential for impacts from throttling of flows and interference with sediment movement. Assuming pipe culverts for temporary access no significant effects were predicted in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) or non-compliance with WFD objectives in **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1). |

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| | | Notwithstanding this, the Applicant has undertaken a review of the 37 no. locations where temporary accesses are required, and can confirm that in the majority of case the watercourse being crossed can be described as small and seasonally dry based on our site observations and desk study. However, the **OCEMP** (Doc Ref. 7.10 Rev 2) has also been updated to include a firmer commitment to clear span structures: "*Pipe culverts for temporary access road crossings will typically only be appropriate on small, seasonally dry channels. On permanently wet watercourses, clear span structures will be used where practicable and safe to do so, except where the crossing forms part of a public highway access point (bellmouth access) or where an alternative crossing solution is justified through the detailed design process. In such cases, it must be demonstrated that there would be no significant adverse effects on fish. The Environment Agency would be consulted as part of the detailed design process, and suitable mitigation measures incorporated into the crossing design.*" |
| **EA33**<br>Open cut trenched cable crossings | Open-cut techniques for watercourse cable crossings can destroy channel bedforms and weaken banks. | The fenland landscape that the Site is located within is characterised by drains / ditches along almost every field boundary. Therefore, there is a large number of watercourse crossings required for the construction of |

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| | Increased risk of bank erosion/ collapse and loss of channel bedform following inadequate reinstatement of open-cut crossings<br>Avoid and/or reduce the number of open-cut cable crossings via careful route design. If open-cut techniques are required, ensure that pre- excavation survey is completed, and that geological layers can be restored to correct layering. Keep channel substrate separate from the rest of the excavated material so that the channel habitat can be correctly restored. If contaminated sediment is found to be and has to be removed from site, restore channel substrate using local materials of similar geology/grain size. | the Scheme infrastructure, as demonstrated by **ES Appendix 2-1: Watercourse Crossing Schedule** (Doc Ref. 6.3 Rev 1). The number of cable crossings required has been reduced through the adoption of an overhead line design for the Grid Connection Route and the Overhead Inter-Array Connection, albeit cable crossings would still be required for cabling within the Solar Development Area, Underground Inter-Array Connection, and within the Grid Connection Route between CSECs, north of High Road, if an underground cable option is adopted (i.e. Work No 14 area), and for the undergrounding of DNO assets, if required. The Scheme has committed to trenchless crossings underneath major watercourses with permanent flow (e.g. South Holland Main Drain). The Applicant's preferred design is to use an overhead line north of High Road (Work No 14 area) and to oversail DNO assets, therefore, reducing the number of cable crossings required. However, as the detailed design is subject to further engagement with NGET and DNOs, the ES provides a worst-case assessment of all watercourses where open trench crossings may be required.<br>For the intrusive crossings, Table 3-7 within the **OCEMP** (Doc Ref. 7.10 Rev 2) sets out the potential |

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| | | risks and mitigation measures for the construction of open cut watercourse crossings. Measures which are secured within the **OCEMP** (Doc Ref. 7.10 Rev 2) include a Pre-works Hydromorphological and Riparian Corridor Survey which will be undertaken to record channel features/habitats and provide the baseline, against which reinstatement will be designed. The **OCEMP** (Doc Ref. 7.10 Rev 2) has been updated to clarify that the banks and the bed will need to be appropriately reprofiled with the inclusion of suitable geomorphic features and geological layers would be restored to correct layering. Channel substrate would be kept separate from the rest of the excavated material so that the channel habitat can be correctly restored. If contaminated sediment is found and has to be removed from Site, channel substrate would be restored using local materials of similar geology/grain size. Banks will be replanted with suitable riparian species, as set out within the **OLEMP** (Doc Ref. 7.16 Rev 1).<br><br>Additionally, with regard to the loss of channel bedform, the watercourses impacted by the Scheme are managed drainage channels, where regular dredging to maintain the drainage capacity of the channels is |

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| | | undertaken. The regular dredging will also result in loss of channel bedform on a regular basis. |
| Water Quality | | |
| **EA34**<br>Water quality monitoring | The Water Management Plan (WMP) does not commit to any sampling, and the frequency and duration of monitoring is unknown. Table 3.4 of OOEMP doesn't include WMP despite there being post- construction water quality monitoring.<br>If a monitoring plan is not suitably designed then it may not be able to detect relevant trends, on water quality during the construction and operation phases.<br>The Applicant should provide further details, including frequency and duration, of water quality monitoring.<br>We support that a Water Management Plan will include details of pre-construction, construction, and post-construction water quality monitoring. However, the statement "it is anticipated that this will be based on a combination of visual observations and in situ monitoring upstream and downstream of the working area", should be strengthened to a firm commitment. The WMP does not recognise that water samples will need to be taken and sent to a laboratory to test for heavy metals, nutrients and dissolved/suspended solids. Applicant should confirm there will be in- situ measurements using MCERTS | The **OCEMP** (Doc Ref. 7.10 Rev 2) commits to the production of a detailed Water Management Plan (WMP), which has been agreed as a suitable approach on other similar NSIP Schemes. The WMP (which will be produced post consent) will also include details of pre, during and post-construction water quality monitoring. Water quality monitoring is anticipated to be required 6 months prior to the preliminary works starting (pre-construction), during construction and for a few months post completion. The purpose of the monitoring is to help with the early identification of any pollution from the construction works and not to compare the before or after water environment conditions. As such, the WMP requirement is tied to the **OCEMP** (Doc Ref. 7.10 Rev 2) rather than the **OOEMP** (Doc Ref. 7.11 Rev 1).<br>Routine grab samples collected at arbitrary times will not support the identification of pollution events as they may not coincide with when one is occurring, and time is needed for the laboratory to report the result. |

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| | approved methods and water samples will be sent to a UKAS accredited laboratory. The WMP should not rely on the Environment Agency's monitoring network, as suggested in the WFD Report. Monitoring should start at least 6 months prior to construction to establish a representative baseline water quality. It should continue throughout construction and into operation to ensure there are no impacts as a result of the phase change. Locations and specific parameters/methods can be agreed with the EA at detailed design. Monitoring locations should include upstream and downstream of any proposed surface water outfalls and water crossings at a monthly frequency. | As such, it is considered more appropriate to use on site observations and in situ testing to support decisions about immediate action. However, grab samples may be useful collected at a lower frequency to monitor general back groundwater quality, performance of treatment systems, and to investigate issues or potentially test the quality of water held in lagoons etc., forming part of temporary construction drainage, prior to their discharge, whilst complying with any Water Discharge Activity Permits that have been agreed with the EA. Where grab samples are to be included a suitable baseline would need to be collected. Details can be provided in the WMP prepared post-DCO and the EA consulted as required.<br><br>The above has been clarified within the **OCEMP** (Doc Ref. 7.10 Rev 2) submitted at Deadline 1. |
| **EA35**<br>Watercourse receptor importance | When considering watercourse receptor importance, it is unclear how downstream watercourses have been included in assessment.<br><br>If watercourses are not given a high enough receptor importance, then mitigation measures to provide protection may be inadequate. Impacts on smaller watercourses which have no WFD classification can still | **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) paragraphs 11.4.1 to 11.4.7 outline the approach to the study area for the assessment.<br><br>For the purposes of this assessment, a general study area of 1km around the Order Limits has been considered in order to identify water features that are hydrologically connected to the Order Limits and |

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| | impact downstream watercourses which do have a WFD classification.<br>We believe the Applicant should increase the receptor importance to High (from Low or Medium) even where a watercourses does not have a WFD classification, if it flows into a WFD classified watercourses and there could be downstream effects. | potential works associated with the Scheme that could cause, or lead to, impacts.<br>**ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) paragraph 11.4.7 acknowledges that watercourse flow and water quality and flood risk impacts can propagate downstream, and therefore, the assessment also considers a wider study area, where relevant.<br>Regardless of the importance of water features, it is an offence to pollute a controlled water, and therefore mitigation has been included within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1), and **ODEMP** (Doc Ref. 7.12 Rev 1) to avoid pollution of all controlled waters. The importance is used to determine the significance of the effect in the ES to inform planning decisions and not the degree of pollution prevention mitigation provided to any given receptor.<br>Watercourses across the study area ultimately drain to the River Welland (land parcels A, B and C) and River Nene (land parcels B and D). The Grid Connection Route is also located within these catchments. The River Welland is considered to be the final receiving water feature in the catchment draining to it that could conceivably be affected, whilst considering its size and |

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| | | factor of dilution available. However, in the case of the River Nene, this is approximately 13km to the east, and significant effects would not be expected at this distance, thus the South Holland Main Drain is considered the final receptor in that catchment.<br><br>Impacted watercourses have been assigned an importance in accordance with criteria set out within Table 11-4 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). As watercourses impacted downstream have also been considered within the assessment, it is not considered necessary to revise the importance of upstream watercourses on the basis of which downstream watercourse they discharge into, as impacts on the latter are already assessed separately. |
| **EA36**<br>Water quality baseline | Table 1-3 does not include any pH, temperature, conductivity, and dissolved oxygen data, and neither Table 1-3 or 1-8 includes any turbidity data, when summarising the water quality baseline.<br><br>An accurate water quality baseline cannot be established and the potential for ecological impacts arising from changes in water quality cannot be fully assessed.<br><br>This data should be collected as part of the pre-construction water quality monitoring secured by the | Paragraph 1.3.14 within **ES Appendix 11-5** [APP-233] states that Table 1-3 uses data from the Environment Agency Monitoring locations, and that the parameters were limited.<br><br>Table 1-8 includes data for Lower Welland – A151, Lower Welland – Runway, and Lords Drain Near Spalding. This includes pH, temperature, and dissolved oxygen data. There is no turbidity data in this dataset. |

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| | Water Management Plan to ensure an accurate baseline is assessed.<br>Table 3-4: WFD Scoping of the Scheme's Components and Activities Against WFD Quality Elements does not mention Turbidity in Physico-chemical Quality Elements. The Water Framework Directive (WFD) does not specify a specific limit for freshwater turbidity. However, it emphasizes the importance of monitoring and assessing water quality to ensure that freshwater bodies remain in good condition. High turbidity levels can indicate poor water quality and may have negative impacts on aquatic ecosystems. | The Water Quality Data Explorer was not functional at the time of writing to allow interrogation of turbidity data.<br>The Water Management Plan (which will be produced post consent), as outlined in the **OCEMP** (Doc Ref. 7.10 Rev 2) will require pre, during and post-construction water quality monitoring. The monitoring as part of the pre-construction would include pH, temperature, conductivity, dissolved oxygen and turbidity.<br>Paragraph 11.4.12 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) states that the "*importance of water features has been determined from a holistic review of water feature attributes. The importance level does not rely on whether water quality is Poor, or Good, due to the principle that no controlled water (i.e. essentially all water features that are not sewers and drains to sewers) may be polluted (with a controlled water having the meaning as set out on Section 104 Part 3 of the Water Resources Act 1991). Water quality impacts have also been based on a qualitative risk assessment that does not require input of raw background water quality data*". Therefore, the lack of turbidity data has not impacted on the assessment. Monitoring will commence before the preliminary works start and continue throughout the main works and for a few months post completion. |

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| | | The purpose of the monitoring is to help with the early identification of any pollution from the construction works and not to compare the before or after water environment conditions. |
| **EA37**<br>Foul water management | Foul water flows will be captured by a sealed cesspit during operation, but it is unclear what provision is proposed for construction and decommissioning phases. Foul drainage should be scoped into the WFD Screening until further clarity is provided.<br>Risk of foul water entering the water environment and deteriorating the water quality.<br>Confirm the use of sealed cesspits for all development phases, and how foul waste will be managed prior to construction of cesspits. Commitment HF-7 should include foul drainage management for all development phases.<br>We acknowledge it says that "waste can be regularly pumped out by a specialist contractor for off-site disposal at a licenced waste facility (i.e. no discharges to ground or a watercourse are proposed", but this must be clear that there will be no discharge to the water environment during any phase of the development. | The **OCEMP** (Doc Ref. 7.10 Rev 2) and **ODEMP** (Doc Ref. 7.12 Rev 1) state that foul drainage during construction and decommissioning will be dealt with by self-contained cesspits and will be regularly emptied by a waste management contractor. This would include use of self contained porta-loos type structures during early stage construction. No discharge to the water environment is proposed in any phase of development. Paragraph 11.4.35, 11.4.39 and 11.7.5 in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) and Table 3-3 in **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1) have been updated at Deadline 1 to refer to these arrangements for foul drainage during construction and decommissioning. Similarly, sealed cesspits to collect foul waste for offsite disposal will be provided for the on-site office during operation. This is set out in paragraph 11.7.51 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) which also confirms that there will be no discharges to ground or a |

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| | | watercourse of treated foul wastewater in any phase of development.<br><br>Commitment HF-7 within the **Environmental Mitigation and Commitments Register** (Doc Ref. 7.7 Rev 1) is specific to the operational phase. However, reference to the foul water management arrangements for construction and decommissioning has been added to Commitments HF-1 and HF-3. |
| **EA38**<br>Concrete mitigation | Concrete mitigation measures have not been detailed. Construction of concrete can be a risk to water quality as it is a known source of hazardous substances, particularly during the curing phase. The WFD Report states that concrete wash water will be prevented from entering any drain but this must be secured in the OCEMP.<br><br>Risk of pollution to surface waters.<br><br>Provide further details on the use of concrete and how it will be managed.<br><br>Further details should include:<br>• Identify all areas where concrete works are proposed<br>• Specify whether these will be cast in situ or precast and delivered.<br>• For in situ concrete pours, Applicant should suggest timing, weather conditions, and runoff control. | There will be no concrete batching plant on site. The use of concrete pours for foundations of Scheme infrastructure will occur and be controlled by measures established within the **OCEMP** (Doc Ref. 7.10 Rev 2). Concrete foundations would be used for Solar Stations, structural components of the On-Site Substations and BESS Compound, pylon leg foundations for the 400kV pylons, and structural components of the CSECs.<br><br>Within **OCEMP** (Doc Ref. 7.10 Rev 2) Table 3-7, it is noted that particular care will be taken with the delivery and use of concrete and cement as it is highly corrosive and alkaline. The use of good practice and adherence to good practice guidance is noted in the **OCEMP** (Doc Ref. 7.10 Rev 2), this includes reference to CIRIA C532 Control of Water Pollution from Construction Site. |

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| | Construction works should be minimised during heavy precipitation events and carried out during dry months where practicable.<br>• Describe containment measures for concrete washout (e.g. lined washout pits, bunded areas) We acknowledge the intention to use p re-fabricated headwalls for the drainage outfalls to avoid the need to pour wet concrete close to a watercourse . | C532[41] includes recommendations for general concrete and grouting works on site.<br>No operational Scheme infrastructure is situated within 10m of any surface water feature, apart from watercourse crossings.<br>Requirement for suitable facilities for concrete wash water to be provided during construction is also set out within Table 3-7 of **OCEMP** (Doc Ref. 7.10 Rev 2).<br>Precast headwalls have been specified in the **OCEMP** (Table 3-7 Doc Ref. 7.10 Rev 2). There will be no batching plant on site, but as noted above there would be concrete pouring from concrete mixers in the area of foundations as highlighted above.<br>As per industry standards like C532, concrete pouring would be avoided in wet weather. Rainfall alters the critical water-cement ratio and can wash away cement slurry, causing environmental contamination to both surface and groundwaters.<br>As secured in the **OCEMP** (Doc Ref. 7.10 Rev 2), Table 3-7, suitable facilities for concrete wash water (e.g. |

[41] CIRIA (2001). C532: Control of water pollution from construction sites – Guidance for consultants and Principal Contractors. Available at: https://www.ciria.org/CIRIA/productexcerpts/c532.aspx

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| | | geotextile wrapped sealed skip, container or earth bunded area) will be adequately contained, prevented from entering any drain, and removed from the Site for appropriate disposal at a suitably licensed waste facility.<br><br>The WMP will include more detail on the use of concrete products. |
| **EA39**<br>Wash water | Lack of clarity regarding the management, containment and disposal of wheel wash water.<br><br>If wash water is not managed correctly, it can enter watercourses and impact on water quality.<br><br>Provide clarity that vehicle and wheel washing activities will be undertaken within a designated impermeable or lined area. Wash water should be contained to prevent contaminated water entering waterbodies or groundwater. The frequency of maintenance of the wheel washing system should be specified. Provide clarity that, if discharge on-site is required, a water discharge activity permit will be sought from the Environment Agency. Rumble strips and dry brushing could be used to remove mud from wheels to help minimise risk to water quality.<br><br>Vehicle and wheel washing is omitted from the OOEMP. The OOEMP should be updated to reflect relevant mitigation measures for any vehicle washing activities occurring during maintenance. | Requirements for the management, containment and disposal of wheel wash water are contained within the **OCEMP** (Doc Ref. 7.10 Rev 2) in Section 2.10, Table 3-2 and Table 3-7.<br><br>This states that a self-contained wheel wash will be installed at every access point to be used by vehicles prior to exiting the Site onto the public highway, if there is mud or debris on the construction site.<br><br>Section 2.11 states that all main waste streams, which will include wheel wash waste, will be separated and transported to an approved, licensed third party waste facility for recovery, recycling or disposal.<br><br>The **OOEMP** (Doc Ref. 7.11 Rev 1) has been updated to include the potential use of wheel washes during the operational stage. |

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| **EA40**<br>Fuel, chemical and oil storage | Inadequate detail provided regarding storage and management of fuel, chemical and oils.<br>Increased risk of fuels, chemical and oils entering the water environment and impacting on water quality.<br>Fuel, chemical and oil storage must be covered to prevent rainfall accumulation. If necessary, a method to remove accumulated rainwater should be provided. They must be stored at least 10m from watercourses. Oil separators could also be used in drainage system.<br>We note that WFD Report and ODEMP say about 110% capacity, but this is not included in the OCEMP or OOEMP, these should be updated so documents are consistent. Fuel storage should comply with this guidance: Oil storage regulations for businesses - GOV.UK and Pollution prevention for businesses - GOV.UK | Within the **OCEMP** (Doc Ref. 7.10 Rev 2) Table 3-7, it is stated that in order to minimise the risk of leakage or accidental spillage of construction materials and potential pollutants on site:<br>• fuel and other potentially polluting chemicals will either be in self-bunded leak proof containers or stored in a secure impermeable and bunded area (minimum capacity of 110% of the capacity of the containers, which includes 10% more capacity than is needed.<br>• any plant, machinery or vehicles will be inspected before every use and maintained to ensure they are in good working order and clean for use in a sensitive environment. This maintenance is to take place off-site if reasonably practicable or, if on-site, only at designated areas, such as the Site compounds. Only construction equipment and vehicles free of all oil/fuel leaks will be permitted on the Site. Drip trays will be placed below static mechanical plant.<br>• all refuelling, oiling and greasing of plant will take place above drip trays or on an impermeable surface which provides protection to underground strata and watercourses, and away from drains as far as |

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| | | reasonably practicable (and a minimum of 20 m). Vehicles will not be left unattended during refuelling.<br>Additional details will be provided within the WMP post consent.<br>The **OOEMP** (Doc Ref 7.11 Rev 1) states that 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. |
| **EA41**<br>Substation impacts | Risk of pollution from fire affecting the substation is not recognised as a potential impact during operation. Electrical equipment at substations, specifically oil-filled transformers, pose a risk if they leak or a fire causes contamination of surface runoff<br>Risk of pollution to surface waters<br>The impact from pollution or fire risk from substations should be adequately identified, and relevant mitigation measures need to be considered.<br>While penstocks are proposed to isolate any contaminated water associated with the BESS, it is unclear if this penstock can also be used to isolate the substation. | Modern substations are designed in accordance with relevant UK standards and incorporate multiple layers of protection including electrical protection systems, fault detection, automatic isolation, fire separation distances, oil containment systems and routine inspection and maintenance. As set out within the **OOEMP** (Doc Ref. 7.11 Rev 1), the proposed substation layout would incorporate fire-resistant walls and a minimum separation distance of 10 m between the transformers as part of the fire protection strategy to limit the potential for fire propagation between |

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| | | adjacent transformers. Consequently, the residual risk of a significant fire event is considered to be low.<br><br>In the unlikely event of a fire, the electrical protection system would automatically disconnect the affected plant (e.g. transformer) from the network. Emergency services would be notified, where appropriate, and the site operator would implement the Emergency Response Plan, as set out within the **OOEMP** (Doc Ref. 7.11 Rev 1). The incident would be quickly attended to by the local Fire Brigade. However, it is expected that active firefighting would only occur if there is a danger to life. It is most likely that the fire will be allowed to burn out in a controlled manner.<br><br>The 400kV and 3 no. 132kV substation sites are all lined, preventing any infiltration of contaminated runoff. All substations except one of the 132kV sites (Parcel D) are also surrounded by flood bunds, which creates an opportunity to contain any contaminated runoff following an incident, but temporary measures would be implemented to contain and runoff at the substation in Parcel D if required, as set out within the **OOEMP** (Doc Ref. 7.11 Rev 1). Any oil cooled transformers will be above a bund that will, as a minimum, have a capacity of 110% of the total oil content of the transformer, which would minimise the |

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| | | risk of environmental contamination in the event of a fire. However, to ensure that any runoff from outside of this bund can be retained within the confines of the lined substation site, the drainage design will allow for it to be possible for the drainage from the substation site to be temporarily blocked if necessary. This may involve the use of temporary inflatable pipe stoppers or other suitable measures to be defined in the Emergency Response Plan to plug the outfall pipe and retain any contaminated water within the substation site, from where it can ultimately be safely removed for appropriate offsite disposal. The necessary equipment to temporarily block the outfall will be retained and maintained on site should it be needed quickly. These measures have been included within the **OOEMP** (Doc Ref. 7.11 Rev 1) submitted at Deadline 1.<br><br>Access arrangements would allow Fire and Rescue Services to respond safely, and any incident would be managed in accordance with the site's Emergency Response Plan and relevant Health and Safety procedures.<br><br>**ES Appendix 11-4: Outline Drainage Strategy** [APP-227] includes surface water drainage from the 400kV On-Site Substation into the same lined containment pond as the BESS Compound. A penstock, automatic |

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| | | with a manual override, can be closed to contain any runoff from a fire in this area. The detailed drainage strategy is secured pursuant to Requirement 10 of the dDCO.<br><br>The **OOEMP** (Doc Ref. 7.11 Rev 1) has been updated at Deadline 1 to include the discussion above and to commit to removing firewater off site to a suitably licenced waste disposal site, even if found to be clean; no firewater runoff will be discharged to ground or to a nearby watercourse. Implementation of the measures contained in the OOEMP is secured through Requirement 11 of the dDCO.<br><br>Paragraphs 11.7.37 to 11.7.41 have been added to **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) to reflect the management of contaminated runoff from substations in the unlikely event of a significant fire. |
| **EA42**<br>Transformers | There will be transformers, and other electrical equipment, associated with the solar stations, the 400 kV Substation, and the BESS, however bunding is unclear.<br><br>Without bunding, transformers could leak or spill, and hydrocarbons could all pose an unacceptable risk to the water environment receptors. | Where transformers and other electrical equipment are oil filled, these will comply with the Control of Pollution |

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| | All transformers should be bunded for all phases of development. They will need to be suitable sized to contain 110% of the volume. Where they are exposed to rainwater, the Applicant must have a mechanism to remove accumulated rainwater regularly. This should be updated in APP -276 Outline Operational Environmental Management Plan and APP -272 7.7 Environmental Mitigation and Commitments Register.<br>We note that section 11.7.21 says that "bunding or a wall is not required" at the 132kV Substation as it lies outside of the flood extents, however, it should be clear that substation equipment will still need to be bunded to protect water quality in the event of a leak. Section 11.8.36 says that electrical equipment containing oils (e.g. transformers) will be self-bunded but this is not seen in the OOEMP or Commitments Register. | (Oil Storage) Regulations[42]. As such they would contain bunding to hold at least 110% of the maximum capacity of the transformer or other electrical equipment.<br>If pollution is detected within the transformer bunds as part of routine inspections it will be suctioned to a self-bunded (or similar) tank and ultimately removed from site for suitable disposal by a licenced waste contractor.<br>Table 3-7 in the **OCEMP** (Doc Ref 7.10 Rev 2) and Table 3-8 in the **OOEMP** (Doc Ref 7.11 Rev 1) states fuel and other potentially polluting chemicals will either be in self-bunded leak proof containers or stored in a secure impermeable and bunded area (minimum capacity of 110% of the capacity of the containers, which includes 10% more capacity than is needed). Furthermore, the bunds under transformers will be routinely monitored and where oil contamination is suspected, the polluted water will be suctioned out for temporary storage in a self-bunded (or similar) tank before appropriate disposal off-site. |

[42] HMSO (2001) The Control of Pollution (Oil Storage)(England)Regulations. Available at: https://www.legislation.gov.uk/uksi/2001/2954/contents [Accessed 25/08/2026]

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| | | Commitment HF-2 within the **Environmental Mitigation and Commitments Register** (Doc Ref. 7.7 Rev 1) has been updated to include reference to the requirement for all oil-filled electrical equipment to be self-bunded with 110% storage capacity provided. |
| **EA43**<br>Firewater testing prior to discharge | The documents suggest the runoff will be contained where it can be tested, but details of testing are unclear.<br>BESS and substations are at risk from fire events, which can significantly reduce water quality if potentially contaminated water is not contained and disposed of.<br>Applicant must commit to further details of firewater testing.<br>We support that firewater will be captured and removed off site by a tanker to an accredited lab for testing or disposal. However, the Applicant should commit that firewater testing will be conducted in consultation with the Environment Agency. Sampling should use MCERTS approved methods, be sent to UKAS accredited laboratories and tested against list of hazardous substances ( Environmental Quality Standards Directive (EQSD) list for WFD assessments - GOV.UK). | In **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1), it is stated that firewater from BESS will be captured and tested prior to being removed off site for disposal and will not be discharged to controlled waters. Testing is to be sufficient to determine composition and to confirm appropriate disposal route. The reason for this is that the water is not expected to be suitable for discharge to controlled waters.<br>Further detail has been provided in **OOEMP** (Doc Ref 7.11 Rev 1), including the commitment to use MCERTS approved methods, and UKAS approved laboratories in consultation with the Environment Agency.<br>Paragraph 4.3.7 of the **OBSMP** [APP-284] states: "Fire water runoff may contain particles from a fire; in the unlikely event of fire water being discharged, the runoff will need to be contained so it can be sampled and tested by a UKAS accredited lab. The water contained by the valves will be tested and removed by tanker and treated offsite (in consultation with the relevant |

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| | | consultees at the time). Pollution analysis will always be conducted before removing from site."<br><br>Paragraph 4.3.7 of the OBSMP [APP-284] will be amended for Deadline 2 to read as follows:<br><br>Fire water runoff may contain particles from a fire; in the unlikely event of fire water being discharged, the runoff will need to be contained so it can be sampled and tested by a UKAS accredited lab. Firewater will be sampled by a suitably competent person and submitted to a UKAS accredited laboratory for analysis using UKAS and MCERTS accredited methods. The samples will be analysed to determine the presence and concentration of contaminants and checked against the hazardous substances listed in the 'surface water pollution risk assessment for your environmental permit' guidance. The water contained by the valves will be removed by tanker and treated offsite (in consultation with the relevant consultees at the time). Pollution analysis will always be conducted before removing from site.<br><br>A similar approach to water testing will be carried out should there be a fire at a substation, and this commitment has been added to Table 3-8 of **OOEMP** (Doc Ref 7.11 Rev 1). |

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| **EA44**<br>Emergency Response Plan | The Environment Agency is listed as a consultee for the development of the Emergency Response Plan (ERP) in the oCEMP, but this commitment is not carried through in the oOEMP or oBSMP.<br>Increased risk of incidents and emergencies having a significant impact on the environment.<br>The ERP should be developed in consultation with the Environment Agency in relation to responding to flood warnings and pollution events . The ERP should identify the importance of notifying any downstream river/groundwater abstractors in the event of a fire should impacts to surface water and/or groundwater occur, to ensure that Environment Agency incident response personnel are made aware of this as a priority. All relevant incident response parties should be made aware of the ERP and provided with immediate access to it. | Paragraph 2.10.1 of **OOEMP** (Doc Ref 7.11 Rev 1) does already reference consultation with the EA for the development of the ERP. In addition, paragraph 1.2.2 of the **OBSMP** [APP-284] stipulates: "The design of the BESS and its impact are controlled in several ways. Prior to commencement of construction of the BESS, a BSMP (in accordance with the OBSMP) is required to be submitted to the relevant local planning authority and approved, in consultation with Lincolnshire Fire and Rescue Service (LFR) and the Environment Agency (EA). The Applicant must operate the BESS in accordance with the approved plan."<br>The Applicant will amend Section 4.4.1 of the OBSMP [APP-284] for Deadline 2 to incorporate the following text:<br>The BESS Site will have a robust and validated emergency response plan (ERP), developed in consultation with LFR. Where an incident has the potential to affect surface water or groundwater, the ERP will include priority notification and escalation procedures for the Environment Agency (EA) and, where applicable, downstream receptors such as licensed abstractors. All relevant incident response parties, including the EA, the lead local flood authority and the site operator, will be made aware of the ERP |

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| | | and will have immediate access to it. Notification procedures will be activated at the earliest practicable stage of any incident with the potential to affect controlled waters.<br>Requirement 6 of the **Draft DCO** (Doc Ref 3.1 Rev 2) also requires the relevant planning authority to consult with Lincolnshire Fire and Rescue and the Environment Agency before determining an application for the approval of the battery safety management plan. |
| Minor errors and points for consideration | | |
| ES Chapter 11: Hydrology and Flood Risk | Detailed comments on ES Chapter 11: Hydrology and Flood Risk [APP-062] | The Applicant has made corrections to **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) in accordance with the comments raised. |
| ES Appendix 11-3: Flood Risk Assessment | Detailed comments on ES Appendix 11-3: Flood Risk Assessment [APP-222] | The Applicant has made corrections to the **FRA** (Doc Ref. 6.3 Rev 2) in accordance with the comments raised. |
| Hydraulic modelling | The overall approach on hydraulic modelling is considered reasonable, however, detailed comments are due to be provided. | The Applicant is in the process of discussing detailed comments received from the EA on the hydraulic modelling. |

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| PFAS in solar panels. | We strongly recommend that all solar panels are PFAS-free. Some solar panels are treated with a PFAS coating. If panels containing PFAS are used, we suggest that there is consideration of this in the OEMP and DEMP. 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. 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. | The Applicant has updated the **OOEMP** (Doc Ref. 7.11 Rev 1) to commit to no PFAS coatings to be used on the PV modules.<br><br>Therefore mitigation for PFAS is no longer included within the **OOEMP** (Doc Ref 7.11 Rev 1), within Table 3-8. The requirement for no washing of panels within periods of high temperature or prolonged sunlight has been added to the **OOEMP** (Doc Ref 7.11 Rev 1). |
| Guidance | The guidance section for hydrology assessment is missing relevant information. Additional guidance is listed. | The guidance and best practice documents listed by the EA have been included within ES **Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1), **ES Appendix 11-1: Hydrology and Flood Risk Legislation, Policy and Guidance** (Doc Ref. 6.3 Rev 1), **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref 7.11 Rev 1), **ODEMP** (Doc Ref. 7.12 Rev 1), **ES Appendix 11-2: WFD Report** (Doc Ref. 6.3 Rev 1), where appropriate. |
| Flocculants | The water management plan should include further details of flocculants to be used in the treatment of water. Chemicals used as flocculants can impact water quality if used incorrectly or in wrong quantities. | Flocculants are only mentioned to be used if absolutely necessary and with appropriate approvals from the EA. If during construction, there is a need to use chemical dosing to manage fine sediment in runoff, then as a last resort, a specialist contractor would be involved and the |

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| | | EA consulted. This is referenced in **OCEMP** (Doc Ref. 7.10 Rev 2). |
| Installation of drainage | Chronologies of the construction programme are unknown at this stage, but it is unclear if drainage and firewater isolation would be completed prior to BESS and Substation construction. Without installing relevant impermeable lining, SuDS and shutoff valves prior to constructing the BESS or Substations, there is a risk that in the event of a fire or pollution event any contaminated water will not be adequately isolated. Applicant should commit to installing suitable drainage prior to other installations.<br>Sections 2.10.5 on construct BESS activities and 2.10.6 on constructing substations should include relevant drainage construction. | Construction of drainage and impermeable lining below structures forms part of the earthworks phase prior to the installation of any electrical equipment or BESS. As such, permanent drainage arrangements would be in place prior to the installation of equipment that poses fire or contamination risks. |
| Inspection and maintenance | Table 3-7 of OCEMP says “Field drainage systems will be maintained during construction”, and Table 3-8 of OOEMP says “regular inspection and maintenance of Applicant owned drainage systems”, but it does not specify a maintenance schedule. Frequency of this inspection is unclear.<br>We support that the ODS says there will be a “A programme of inspection and maintenance will be designed by the contractor”, however this maintenance | **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and the **Environmental Mitigation and Commitments Register** (Doc Ref 7.7 Rev 1) have been updated to refer to a programme of maintenance and inspection being implemented for on-site drainage. |

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| | schedule should be referred to in the commitments register, OCEMP and OOEMP too. | |
| Water Management Plan | The WMP is referenced in Commitment HF-1 'Good Practice Environmental Management Measures During Construction', but should also be included in HF2 'Good Practice Environmental Management Measures During Operation'. oOEMP Table 3-6 does not include the WMP or any monitoring details. | As explained under EA34, a detailed WMP is to be prepared for the mitigation and monitoring of impacts during the construction stage (and for a short period post-construction). Good practice measures to minimise risks to the water environment during the operational phase are set out within Table 3-8 of **OOEMP** (Doc Ref. 7.11 Rev 1), however, no separate WMP is proposed. |
| Outline Drainage Strategy | We support that the ODS section 5.10.2 describes the swale and how any gravel or soil will be managed after a fire event, however this detail should also be contained within the OBSMP and included in the Commitments Register for consistency. | The Applicant notes the Council's comments and agrees that, for consistency, the relevant detail in paragraph 5.10.2 of **ES Appendix 11-4: Outline Drainage Strategy** [APP-227] and the **Environmental Mitigation and Commitments Register** (Doc Ref. 7.7 Rev 1) regarding the management of gravel and soil following a fire event should also be reflected within the **OBSMP** [APP-284] . The OBSMP will therefore be updated accordingly at Deadline 2. |
| Water supply | Section 11.4.33 says "90 litres per day" as the supply of water at the construction compounds (industrial standard for industrial use). Whereas 11.4.36 says "based on the | Paragraph 11.4.33 in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) has been updated to |

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| | industry standard of 90 litres per person". For clarity, we recommend a minor edit to 11.4.33 to state the intended water use as 90 litres per person per day. | state the intended water use as 90 litres per person per day. |

## 3.6. Forestry Commission

3.6.1. Table 3-6 below sets out the Applicant's response to the issues raised within the Relevant Representation from the Forestry Commission [RR-050] including signposting to the relevant sections of the DCO Application.

**Table 3-6: Forestry Commission**

| Topic | Matter Raised | Applicant's Response |
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| Ancient & Veteran Trees: | There are no ancient woodlands within or adjacent to the site, although there are a few small isolated woodlands within the site, some of which are priority habitat mixed deciduous woodland.<br><br>We note that 7 veteran trees, 4 ancient trees and 6 notable trees have been identified within the site. | Noted, no further response required. |
| Ancient & Veteran Trees | The buffer zones applied appear to be sufficient, although concerns remain about the potential for some development, particularly regarding access within the RPA's of some of the veteran trees. We note that one notable tree is scheduled to be removed. | As stated in Section 7.6 of **ES Appendix 12-8: Arboricultural Impact Assessment** [APP-242], no development impacts are considered likely to occur for ancient or veteran trees. Incursions may be required within the RPA of veteran/ ancient trees, however, this will be limited to the use of existing access routes and will not represent a change in use and will not result in an impact associated with the Scheme. Any indirect impacts such as dust will be managed in accordance with an Arboricultural Method Statement which will be developed post-DCO consent and is secured by the **Outline Construction Environmental Management Plan (OCEMP)** (Doc Ref. 7.10 Rev 2). |

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| | | As set out in Section 8.1 of **ES Appendix 12-8: Arboricultural Impact Assessment** [APP-242], one notable elder is to be removed as a reasonable worst case for the third party utility diversion buffers in the Grid Connection Route. The Applicant's preferred design is for the Grid Connection Route to oversail third party assets, however, the removal of the notable tree has been accounted for as a worst-case assessment. Where practicable the detailed design will be developed to avoid or minimise impacts to trees and in practice this is likely to substantially reduce the level of arboricultural impacts reported. The final level of arboricultural impacts will be confirmed as part of an Arboricultural Method Statement and secured by the **OCEMP** (Doc Ref. 7.10 Rev 2). |
| Ancient & Veteran Trees | For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's | These buffers have been applied to the tree survey data as appropriate in accordance with Natural England and Forestry Commission Standing Advice (2022)[43] and as described in Section 5.3 of **ES Appendix 12-8: Arboricultural Impact Assessment** [APP-242]. |

[43] Natural England and Forestry Commission (2022) Ancient woodland, ancient trees and veteran trees: advice for making planning decisions. Available at: https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions. Accessed: 31 July 2026.

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| | diameter. This will create a minimum root protection area. | |
| Ancient & Veteran Trees | An increase in traffic, particularly heavy construction traffic, even when utilizing existing access tracks within the RPA's could lead to habitat degradation. Any effect from the incursion into RPA's of veteran trees may not become immediately apparent and will need to be extensively monitored, even after construction. | Section 7.6 of **ES Appendix 12-8: Arboricultural Impact Assessment** [APP-242] notes that any use of existing access tracks will not represent a change from existing use. Site monitoring and supervision (as well as tree protection measures) will be developed and specified in an Arboricultural Method Statement to be delivered post DCO consent, which is secured by the **OCEMP** (Doc Ref. 7.10 Rev 2). |
| Ancient & Veteran Trees | Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage. | Noted. As stated in paragraph 5.4.2 of **ES Appendix 12-8: Arboricultural Impact Assessment** [APP-242] there are no ancient woodlands within or adjacent to the Site. In addition, as set out within Section 7.6, the Applicant's position is that existing veteran or ancient trees will not be subject to loss or deterioration. |
| Tree Removals, Canopy Cover and Tree Planting | We note a number of trees and tree groups will need to be removed to facilitate development. This would equate to almost 10% of the canopy cover across the site, in an area that currently already has low levels of canopy cover.<br><br>Application documents state that "bands of shrubs" and "bands of shrubs with scattered trees" will be planted as a part of the development, it is unclear if this will | The landscape mitigation strategy, set out within the **OLEMP** (Doc Ref. 7.16 Rev 1), has been developed through an iterative design process to achieve an appropriate balance between reducing landscape and visual effects, enhancing biodiversity, maintaining the characteristic landscape pattern of the Fenland landscape and avoiding unnecessary loss of Best and Most Versatile (BMV) agricultural land. The objective of the landscape mitigation is not to maximise |

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| | compensate for the canopy cover removed or how that reflects any uplift in canopy cover.<br><br>It is stated that no woodland is planned to be planted due to the loss of BMV land.<br><br>EN-1 Overarching National Policy Statement for Energy Section 4.3.20 states:<br><br>'The Government has set 13 legally binding targets for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas. Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State should have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act.'<br><br>A greater extent of woodland/tree belt creation that is well-designed and managed is encouraged as more proportionate to the scale of development in the context of national targets, local biodiversity policies and targets (including the local nature recovery strategy). | screening irrespective of context, but to reduce adverse landscape and visual effects whilst respecting the defining characteristics of the receiving landscape. The Fenland landscape is characterised by its open, low-lying and expansive nature, with limited woodland cover and only occasional tree belts and scattered trees. The introduction of extensive woodland or interconnecting tree belts solely to increase canopy cover would not reflect the established landscape pattern and could itself give additional rise to adverse landscape effects through the introduction of atypical enclosures and changes to openness. Accordingly, the proposed mitigation adopts a balanced and proportionate approach, incorporating bands of shrubs, bands of shrubs with scattered trees and vegetated corridors to provide localised filtering and screening, reinforce existing landscape features where appropriate, improve habitat connectivity and contribute to biodiversity enhancement, whilst retaining the inherent openness that characterises the Fenland landscape as far as feasible.<br><br>The **Biodiversity Net Gain Report** (Doc Ref. 7.9 Rev 1) sets out the predicted losses and gains in habitat and vegetation arising from the Scheme. Table 4 notes an overall net increase in habitat units for |

| Topic | Matter Raised | Applicant's Response |
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| | 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 in strategic areas. Isolated trees are also more likely to suffer from windthrow than when planted in groups and woodlands or tree belts. | woodland and forest. The Applicant considers that the proposed landscape strategy provides an appropriate and proportionate response to the Scheme, balancing landscape, visual, ecological and agricultural considerations rather than applying a generic increase in tree cover. |
| Tree Removals, Canopy Cover and Tree Planting | The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases.<br><br>Use of the Forestry Commission Ecological Site Classification Tool (ESC) can assist with selection of tree species that are ecologically suited to particular sites and includes climate change predictions to allow for future suitability and woodland resilience.<br><br>The Climate Matching Tool - Forest Research also provides a visualisation of regions with a similar climate to the climate projection for any location in Europe. It gives an indication of the climate that trees are likely to experience in the future. This can help practitioners to consider the selection of better suited material from environments that England may experience in the future. | **OLEMP** (Doc Ref. 7.16 Rev 1) establishes the principle that the landscape mitigation planting will comprise native species appropriate to the receiving landscape. The detailed planting specification will be developed at the detailed design stage, taking account of local site conditions, anticipated climate change, long-term resilience and biosecurity considerations. In this regard, the Applicant acknowledges the Forestry Commission's references to the Ecological Site Classification (ESC) Tool and the Climate Matching Tool and will have regard to relevant guidance, where appropriate, when finalising species selection and provenance. This has been referenced within the updated **OLEMP** (Doc Ref. 7.16 Rev 1) at Deadline 1. |

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| Deer fencing | As this project will include a large area of fencing, it has the scope to exclude a large amount of farmland from the deer range in the area. In areas where woodlands are contained and surrounded by the site, fencing could curtail their movement if they are inside the fencing.<br><br>This is likely to increase herbivore browsing and grazing to other areas in close proximity to the site. Impacts are likely to increase in surrounding woodlands and the wider landscape, where hedgerows and stewardship schemes may be impacted upon.<br><br>Large scale fencing will also change how deer move through the landscape, which may also increase the numbers of deer crossing local roads, and therefore may increase the numbers of deer vehicle collisions in the area. If culls occur prior to development, the risks should reduce. | No culling is proposed. The security fencing is needed for safety purposes and is therefore unavoidable. Positioning of the fencing has been designed to only cover the smallest extent required for the development coverage, with a focus on the arable fields where the solar panels will be positioned. |

## 3.7. Historic England

3.7.1. Table 3-7 below sets out the Applicant's response to the issues raised within the Relevant Representation from Historic England Services [RR-069] including signposting to the relevant sections of the DCO Application.

**Table 3-7: Historic England**

| Topic | Matter Raised | Applicant's Response |
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| Engagement | We have been engaged with the applicants in positive pre-application discussions which have included our advice on archaeological and setting matters alongside local government archaeological and built heritage advisers. We have provided input on the methodology for archaeological fieldwork in the unusually complex conditions found in former wetlands. We have had a very positive response to this engagement and we are currently awaiting the detailed reporting of deposit modelling and targeted intrusive investigations undertaken to date. | The Applicant welcomes the response from Historic England. The Applicant has submitted the final evaluation trenching results and deposit modelling at Deadline 1 within **Final Archaeological Evaluation Report** (Doc Ref. 8.6) and shared the document with Historic England prior to submission. The Applicant has reviewed the assessment presented within **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) as a result of the additional information and has concluded that the additional results do not change the conclusions regarding the potential impact of the Scheme on the cultural significance of the archaeological deposits. |
| | We have provided comment on the analysis of setting effects in respect of Crowland Abbey and the experience of its former estate. We have also engaged in respect of setting effects in respect of Wykeham Chapel in the which instance we note the overhead line is drawn to run east of the proposed Grimsby to Walpole scheme. We note the effort to mirror the pylon positions between | The Applicant has no further comments make on this matter. |

| Topic | Matter Raised | Applicant's Response |
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| | these schemes at the field edges (in views east) which is welcomed. | |
| Cumulative impact | Cumulative impacts of multiple overhead lines on the significance of the Chapel will be experienced from the small graveyard and open ground to its east (noting the seasonal screening effects of trees). Cumulative impacts between present, existing and forthcoming schemes should be considered in particular at Wykeham Chapel. All schemes should endeavour to minimise the cumulative setting impacts insofar as possible within their individual constraints. A joint statement NGRID schemes and Meridian regarding setting at Wykeham may assist the ExA(s). | The Applicant's cumulative assessment is set out within Section 8.12 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1). Although the Applicant has endeavoured to minimise this as far as possible by locating the pylons in the fields to the north and south of the field to the east of the chapel and ensuring they do not appear in the views from the east facing window, a moderate adverse (significant) cumulative effect is identified on the Wykeham Chapel Scheduled Monument and Grade I listed chapel. |
| | Our current assessment of setting impacts upon Crowland Abbey, Guthlac's Cross, Wykeham Chapel, Medieval boundary earthworks at Queen's Bank, and the buried archaeological scheduled monuments concur with those submitted by the applicant (moderate adverse - significant). | The Applicant has no further comments to make on this matter. |
| Kinetic Views | Further refinement of the array design to the sides of Cloot Drove should be informed by analysis of the kinetic experience of travelling between the boundary of the former monastic lands at Guthac's Cross and Crowland Abbey in the same way the | The Applicant has discussed the approach to considering the kinetic experience with HE and has prepared **Crowland Kinetic Views Assessment** (Doc Ref. 8.26) for submission at Deadline 1. |

| Topic | Matter Raised | Applicant's Response |
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| | experience of movement between the medieval boundary at Queens bank and Guthlac's cross should be further explored, setting work today has engaged with views from points but is experience of moving through landscape with features dropping in and out of view that requires further work. | |
| Conclusion | We look forwards to further positive engagement with the applicant and the preparation of a statement of common ground. | The Applicant thanks Historic England for its engagement to date. The Applicant has prepared a **Statement of Common Ground with Historic England** (Doc Ref. 8.14) for Deadline 1. |

## 3.8. National Grid Electricity Distribution

3.8.1. Table 3-8 below sets out the Applicant's response to the issues raised within the Relevant Representation from National Grid Electricity Distribution [RR-137] including signposting to the relevant sections of the DCO Application.

Table 3-8: National Grid Electricity Distribution

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| General | The application includes land in or upon which NGED may have assets and which may include (but are not limited to) high voltage electricity cables. NGED is currently reviewing the draft Order setting out the Authorised Development to establish the extent to which their apparatus and interests are affected. | The Applicant notes these comments. |
| Protective Provisions | While NGED will continue to seek to have positive engagement with the applicant in relation to the project, NGED needs to ensure that the wider powers being sought in the Order will not have a detrimental impact on NGED's electricity network and its duties under the EA 1989. This includes ensuring acceptable terms of any proposed protective provisions. | The Applicant notes NGED's representation and its interest in protecting existing electricity distribution assets and infrastructure within the Order limits. The Applicant is engaging with NGED regarding appropriate protective provisions for inclusion within the **Draft DCO** (Doc Ref 3.1 Rev 2) and any associated asset protection arrangements. The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), which identifies the current status of engagement with NGED, including discussions relating to protective provisions and the protection of NGED's electricity |

| Topic | Matter Raised | Applicant's Response |
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| | | distribution assets and operational interests. Those discussions are ongoing and the Applicant will continue to work with NGED with a view to agreeing suitable protections for NGED's apparatus and statutory functions. The draft DCO will be updated as necessary to reflect any agreed position reached during the Examination. |
| Holding Objection | NGED is therefore making this representation as a holding objection to the application until an asset protection arrangement has been agreed between the parties. No formal agreement has yet been concluded and accordingly we are lodging this representation to protect NGED's position pending conclusion of an appropriate agreement. Once NGED is satisfied that its network is protected, we will notify the Planning Inspectorate promptly and withdraw the objection. | The Applicant notes NGED's position. The Applicant is actively engaging with NGED in relation to asset protection arrangements and the negotiation of bespoke Protective Provisions, and discussions between the parties remain ongoing. The latest position is recorded in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2).<br><br>The Applicant welcomes NGED's continued engagement throughout the Examination and will continue to work constructively with NGED with a view to reaching agreement on an appropriate package of protections for NGED's apparatus and operational interests. Should agreement be reached, the draft DCO will be updated as necessary to reflect that position.<br><br>The Applicant held an initial meeting with NGED on technical matters on 3 September and will continue to engage in developing the detailed design. |

## 3.9. National Grid Electricity Transmission

3.9.1. Table 3-9 below sets out the Applicant's response to the issues raised within the Relevant Representation from National Grid Electricity Transmission [RR-138] including signposting to the relevant sections of the DCO Application.

**Table 3-9: National Grid Electricity Transmission**

| Topic | Matter Raised | Applicant's Response |
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| General | Engagement and Co-operation to date NGET and the Applicant have been involved in meaningful engagement throughout the Applicant's pre-application period comprising of collaborative design workshops and having regular project team meetings with the Grimsby to Walpole project team. NGET has sought to develop a design option that would secure the successful delivery of both projects. However, as explained further below, this has not been possible. | The Applicant notes NGET's comments but disagrees with the statement that a suitable design option has not been identified. This position is elaborated in the rows below. |
| Overhead Line Routing Options and Design Interactions between the two Projects | | |
| Stand-off Distances | NGET's design work has identified that the separation between the two projects is less than the required stand-off distance set out in National Grid's Technical Specification Generic Design Principles for Overhead Lines TS2.04 Issue 6 (2021). These stand-off distances are required to allow for asset maintenance and general safety. The required stand-off distance between the two overhead lines is around 92.25 m, based on a 55.5 | Across the UK, various 400kV transmission lines have been constructed and currently operate in close parallel at varying separation distances. A few examples of existing 400kV OHLs in parallel (centreline to centreline) are provided below:<br>- The YYJ and ZB OHLs near Tilbury route in ~55m close parallel. |

| Topic | Matter Raised | Applicant's Response |
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| | m tower height. The anticipated separation between the two schemes is only around 75 m.<br><br>The Meridian Solar Project's current design would therefore result in operations inside the required stand-off distance. This would impede NGET's ability to maintain its assets in a safe manner. The current design would result in a residual hazard that NGET would be left to manage for the operational life of its asset. The Meridian Solar Project's design must therefore be amended so that it complies with the required stand-off distances. Its current design means that the Meridian Solar Project cannot co-exist with Grimsby to Walpole. As such, NGET objects to the Meridian Solar Project in its current form. | - The 4TM and ZDA OHLs south of Keadby route in ~65m close parallel.<br><br>- The ZDF and ZDA OHLs south of High Marnham route in ~60m close parallel.<br><br>- The 4KG and 2KN OHL's south of Barton-Upon-Humber route in ~70m close parallel.<br><br>- The 2AC and 2AD OHL's west of Killingholme route in 50 ~50m close parallel.<br><br>The applicant appreciates that these OHLs have already been constructed, and since that, health and safety standards have improved, technical specification and designs have evolved and perhaps these traditional stand-off distances are no longer deemed suitable. Despite this, National Grid continue to operate and maintain their parallel lines in a 'safe manner' whilst overcoming any 'residual hazards' that may exist and need to be managed for the operational life span of their assets.<br><br>NGET has not explained why any site-specific hazards arising from the proposed close parallel arrangement could not be managed through the same operational, maintenance and safety procedures that are routinely employed elsewhere on the transmission network.<br><br>As per Section 5.8.3 of the Norwich to Tilbury 'Appraising 'Close Parallel Opportunities' of the 'Corridor and |

| Topic | Matter Raised | Applicant's Response |
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| | | Preliminary Routeing and Siting Study (CPRSS) 2025'[44], National Grid have stipulated that the "minimum distance between close-parallel lines is determined by technical and safety constraints" and would typically be 80m. The maximum distance at which the benefits of close paralleling might be achieved depends on local factors". The document also notes that "Sizewell and Bramford are only 50m apart" as they were constructed together. This information is available on the National Grid Project website.<br><br>NGET's representation does not identify any provision of 'Technical Specification Generic Design Principles for Overhead Lines TS2.04 Issue 6 (2021)' which prescribes a mandatory minimum stand-off distance of 92.25 m between transmission lines. Nor has NGET explained how the asserted requirement has been derived from TS2.04.<br><br>The key consideration is whether National Grid considers a reduced separation acceptable through site-specific assessment. Whilst National Grid advise that the preferred, minimum stand-off is marginally reduced, NGET have not |

[44] National Grid (2025) 7.18 2022 - Corridor and Preliminary Routeing and Siting Study. Available at: https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-000234-7.18%202022%20-%20Corridor%20and%20Preliminary%20Routeing%20and%20Siting%20Study.pdf [Accessed 21/08/2026]

| Topic | Matter Raised | Applicant's Response |
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| | | presented any evidence as to why this would impede NGET's ability to maintain its assets in a safe manner, in this specific location.<br><br>The Applicant's current assessment indicates that Grimsby to Walpole (G2W) and Meridian Projects can co-exist. Between Long Lane and High Road, both 400kV OHLs can co-exist in close parallel with a stand-off of 85m from centreline to centreline. Two pinch points exist at Broad Gate and Delgate Bank, however the Applicant believes there's sufficient space for both schemes to incorporate the full 50m limits of deviation (LoD). It is believed that the only location where close paralleling needs to reduce to 75m is north of High Road (A151) due to the Anglian Water pipelines in the ground and treatment works site to the east, and the farm complex to the west beyond Lord's Drain. In this area, if both schemes commit to a reduced lateral LoD then both OHLs could be routed through the pinch points to keep all infrastructure together on the approach to Weston Marsh B substation and avoid encircling farms and scattered properties in the area. The Applicant therefore considers there remains a credible design solution capable of accommodating both projects through this area, subject to further engagement between the parties. |
| Connection Agreement | As detailed within the Applicant's Grid Connection Statement [APP-270], following its application to NESO for a connection agreement, the Meridian | NGETs comments in respect of its internal prioritisation of engagement with energy projects in respect of their current |

| Topic | Matter Raised | Applicant's Response |
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| | Solar Project received only a Gate 1 offer status as part of the NESO Connections Reform process. A Gate 1 offer is a provisional, deferred connection agreement issued to power generation projects that do not meet the readiness or strategic alignment criteria required for immediate connection (Gate 2). The Gate 1 status means that the Meridian Solar Project can remain in the connections process, but it does not reserve capacity, a place in the queue, protected status, nor does it guarantee a connection. To progress, the Applicant must submit a Gate 2 application during an allocated application window (typically held every six months) and meet the prescribed evidence requirements. Given the Meridian Solar Project's current Gate 1 status, NGET will not be progressing any works specifically associated with the connection of the Meridian Solar Project, as they are not considered to be required to support wider connections or other network reinforcements. NGET's focus is directed towards Gate 2 projects. | connections offer status are noted and accepted by the Applicant.<br><br>However, with respect it is noted that NGET's internal prioritisation of engagement based on Gate Status does not extend to the relative planning merits of energy projects. This is reflected by:<br><br>• Paragraph 4.11.6 of EN-1 which recognises that applicants may wish to take a commercial risk where they have not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application.<br><br>• The nature of the NESO gating process itself, whereby holding relevant planning permissions/consents goes to the readiness criteria used to determine Gate 2 status. This clearly envisages some projects proceeding to seek consents in advance of being identified as "Gate 2".<br><br>Gate 1 status indicates a connection date beyond 2035, reflecting the outcome of the first Gate 2 assessment round. As noted above, an earlier connection may be possible within the 2031 to 2035 window should the Applicant be successful in reapplying through future Gate 2 application rounds. For the avoidance of doubt, the Applicant intends to submit a Gate 2 application in future application rounds. The exact dates for future application rounds will be |

| Topic | Matter Raised | Applicant's Response |
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| | | confirmed by NESO once there is greater clarity on the available connection capacity of the relevant grid infrastructure beyond 2030. Continued progression of the Scheme through the DCO process further demonstrates project maturity and readiness in support of future Gate 2 applications. |
| Weston Marsh Substation | The Meridian Solar Project's proposed connection point at Weston Marsh B has not been accounted for within the design for the Weston Marsh B substation. Separately from the Gate 1 status issue, there is a discrepancy regarding the proposed connection point. The Meridian Solar Project design assumes a point of connection at Weston Marsh B Substation, which forms part of the Grimsby to Walpole project, and acknowledges Weston Marsh A Substation as an alternative. However, prior to the Connections Reform process, the Meridian Solar Project was allocated a bay at Weston Marsh A, not Weston Marsh B. Accordingly, even setting aside the Gate 1 issue, the Meridian Solar Project's proposed connection point at Weston Marsh B would not have been accounted for within the design for the Weston Marsh B substation. | The Applicant has sought to take into account the latest information released by NGET in respect of this connection infrastructure being delivered by Grimsby to Walpole. The Applicant notes that the detailed design of the Weston Marsh substations remains under development by NGET and therefore considers it reasonable to identify a preferred connection location based on the best available information at the time of submission.<br><br>In November 2025, the NGET published the anticipated locations and layouts of the proposed Weston Marsh A and B substations as part of a targeted consultation. The targeted consultation also identified where new overhead line infrastructure could be located and where existing overhead lines would be reconfigured to facilitate the project.<br><br>Taking into account these designs, and as the Applicant's connection will approach from the south, the connection for the Scheme was therefore designed to the southernmost of the two substations (Weston Marsh B Substation). This |

| Topic | Matter Raised | Applicant's Response |
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| | | approach was adopted to minimise the level of interaction with the other projects in this area, including Grimsby to Walpole, and to avoid approximately 2 km of further overhead line or underground cable to connect into the northern substation. The Applicant has included land surrounding the proposed location of Weston Marsh B Substation to provide sufficient working space to connect once the exact location is confirmed by NGET.<br><br>In respect of the commentary by NGET which suggests there is no consideration of Meridian Solar in its ongoing connection planning, the Applicant does seek clarification from NGET as to the ongoing reference to Meridian Solar in its planning applications for substation infrastructure in the Weston Marsh Area. Specifically, NGET submitted a planning application for its Weston Marsh A Substation [H22-0466-26] in June 2026. The Planning Design and Access Statement for that application assumes a grid connection date of 2033 for the Meridian Solar Farm project (see paragraph 4.2.1) and refers to the Scheme when describing the need for substation infrastructure in the Weston Marsh area. It cites at paragraph 3.3.4, "*The recent approval of the ODOW DCO, together with the acceptance of the Meridian Solar Farm DCO application for examination, the forthcoming Weston Marsh to East Leicestershire and Ossian Wind Farm DCO proposals, confirms that the Weston Marsh area is essential in relation to grid connection and substation* |

| Topic | Matter Raised | Applicant's Response |
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| | | *infrastructure*". The Applicant would welcome clarification as to how the assumptions set out within NGET's Weston Marsh A planning application align with the position presented in this Relevant Representation.<br><br>In the event that the Scheme cannot be accommodated at Weston Marsh B Substation, or Weston Marsh B Substation were to move, the Applicant shall seek to obtain further planning permission(s) and/or a material change to the DCO to bridge any gap between the current Order Limits and the final location of the substation for connection. The Applicant does not consider it reasonable to undertake such changes to this application at this time, given the ongoing design development required by NGET, and the lack of clarity as to its connection position, as set out above.<br><br>Given the information made publicly available by NGET at the time of preparing the application, the Applicant considers that it has adopted a proportionate and reasonable approach to identifying a connection strategy. The Scheme has been designed to maintain flexibility whilst avoiding unnecessary infrastructure and minimising direct and cumulative environmental effects. |
| Eastern Green Link 3 and Eastern Green Link 4 | NGET is considering whether the Meridian Solar Project would adversely affect the above proposed NGET projects in addition to Grimsby to | The Applicant has sought to engage with NGET regarding the interaction between the Scheme and the Grimsby to Walpole project. NGET has indicated that it does not intend to progress discussions on these matters at this stage in light |

| Topic | Matter Raised | Applicant's Response |
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| | Walpole and reserves the right to make further submissions on this in due course. | of the Scheme's Gate 1 status. The Applicant has continued to seek engagement and remains willing to discuss any potential interactions between the projects as further information becomes available. |
| Existing Infrastructure | As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and to ensure that any development does not adversely affect those statutory obligations. NGET has a duty to protect its position in relation to apparatus and land which is within or in close proximity to the Meridian Solar Project's draft Order Limits. Additionally, NGET must protect its ability to deliver, operate and maintain its future proposed infrastructure. NGET will therefore require appropriate protection for retained or proposed infrastructure, including compliance with relevant standards for works proposed within close proximity of its apparatus or proposed apparatus. NGET's rights of access to inspect, maintain, renew and repair its retained apparatus must be maintained at all times and access to inspect and maintain such apparatus must not be restricted. Similarly, the Applicant must have regard to such reasonable requirements as NGET may articulate in order to ensure the safe, economic and efficient construction, | The Applicant is engaging with NGET in relation to the scope and wording of bespoke Protective Provisions, including provisions governing the exercise of powers affecting NGET's land, rights and apparatus. The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2). |

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| | commissioning, operation, maintenance and decommissioning of any future proposed apparatus, including that which may be required in order to facilitate the Project's connection to the National Electricity Transmission System. Further, where the Applicant intends to acquire land or rights, or interfere with any of NGET's interests in land or NGET's existing and/or future proposed apparatus, NGET will require appropriate protection. The Applicant is seeking the permanent freehold acquisition of land, and the acquisition of temporary and permanent rights over a number of plots containing NGET rights and assets for NGET's existing 2WS and 4ZM 400 kilovolt (kV) overhead line routes, including parcels B4-56, B4-77, B4-79, B4-80, B4-81, B4-84, B4-85, B4-86, B4-87, B5-5, B5-6, B5-8, B5-9, B5-12, B5-14, B5-15, B5-16, and B5-20. NGET also notes land has been included within the Order Limits for the purposes of Work Nos. 14 and 15 (works in connection with a new National Grid substation), Work Nos. 9 to 13 (works in connection with a connection to the existing overhead transmission electric line) and potentially Work No. 6, as noted in Work Plans [APP-010]. | |

| Topic | Matter Raised | Applicant's Response |
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| | NGET owns and operates the following assets located within and in close proximity to the Order Limits for the Project. These assets form an essential part of the electricity transmission network in England and Wales. The electricity assets impacted are as follows: • 2WS 400 kV OHL • 4ZM 400kV OHL | |
| Protection of NGET Assets | NGET requires protective provisions to be included within the Order to ensure that its existing and future assets and interests are adequately protected, as well as to ensure compliance with relevant safety standards. A copy of NGET's required protective provisions appears in the Appendix to this document. | The **Draft DCO** (Doc Ref 3.1 Rev 2) 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. The latest position on those negotiations is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), which identifies the current status of engagement with NGET, including discussions relating to protective provisions. The Applicant continues to engage with NGET following submission of the DCO Application to ensure that disruption is minimised as far as reasonably practicable. |
| Compulsory Acquisition Powers in Respect of the Project | Where the Applicant seeks powers of compulsory acquisition over NGET land, or land in which NGET holds rights or apparatus or that may be required for future NGET projects, the Protective Provisions must require the Applicant to obtain | The Applicant acknowledges NGET's position. The Applicant is engaging with NGET in relation to the scope and wording of bespoke Protective Provisions, including provisions governing the exercise of powers affecting NGET's land, rights and apparatus. The latest position on those |

| Topic | Matter Raised | Applicant's Response |
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| | NGET's prior written consent to the exercise of such powers. | discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2).<br><br>Discussions between the parties remain ongoing and the Applicant will continue to work constructively with NGET throughout the Examination with a view to agreeing an appropriate package of protections for NGET's assets and operational interests. Any agreed position will be reflected in the draft DCO as appropriate.<br><br>However, the Applicant does not accept the position that compulsory acquisition powers for the Scheme should be restricted in respect of land required for future NGET projects which NGET does not currently own. This extends beyond the scope of the protections under s 127 of the Planning Act 2008, which relates to land or rights in land already held by a statutory undertaker. Restricting the Scheme from acquiring land remains subject to future design, consenting and acquisition processes of NGET is unduly and inappropriately restrictive. |
| General | NGET reserves the right to make further representations as part of the Examination process in relation to specific interactions with any NGET projects identified during the Examination process, and as negotiations continue, but in the meantime will continue to liaise with the Project with a view to reaching a satisfactory agreement | The Applicant notes NGET's statement that it will continue to liaise with the Scheme and keep the Examining Authority updated on discussions. The Applicant has sought to engage with NGET regarding potential interactions between the Scheme and NGET's proposed projects in the Weston Marsh area. Whilst NGET has indicated that it does not wish to progress detailed discussions at this stage due to the |

| Topic | Matter Raised | Applicant's Response |
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| | during the Examination process and will keep the Examining Authority updated in relation to these discussions. | Scheme's Gate 1 status, the Applicant has continued to seek engagement and remains committed to working collaboratively to understand and address any potential interactions. The Applicant would welcome the opportunity to progress these discussions during the Examination. |

## 3.10. National Highways

3.10.1. Table 3-10 below sets out the Applicant's response to the issues raised within the Relevant Representation from National Highways [RR-139] including signposting to the relevant sections of the DCO Application.

**Table 3-10: National Highways**

| Topic | Matter Raised | Applicant's Response |
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| Trip Generation | 3.3 During the peak construction period in 2031, the Meridan Solar Farm anticipates a maximum daily workforce of 855 staff on site. Of this total, 385 staff (45%) are projected to travel by car, with a car-sharing ratio of 1.3 persons per vehicle, resulting in 296 car trips per day. The remaining 470 staff (55%) will travel by shuttle services, with a total of 20 shuttle buses estimated.<br><br>3.4 The peak hours for staff development trips are 06:00-07:00 for arrivals and 19:00-20:00 for departures, Monday to Friday. These times are outside the SRN peak hour periods. During the peak construction hour, the trip generation for HGVs and LGVs results in a total of 215 one-way (428 two-way) delivery vehicle movements per day. We welcome the approach that deliveries during the construction phase will be managed outside of morning and evening peak hour periods (08:00-09:00 and 17:00-18:00) with the implementation of a Delivery Management System. | The Applicant welcomes National Highways' confirmation that it is content with both the trip generation methodology and the resulting traffic projections presented within the assessment. |

| Topic | Matter Raised | Applicant's Response |
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| | Overall, we are content with the trip generation methodology and estimated results and have no further comments on this. | |
| Trip distribution | 3.5 We have reviewed the submitted construction staff trip distribution methodology and HGV traffic movement assumptions for the proposed Meridian Solar Farm. As part of this review, we have undertaken an independent analysis using 2011 Census Journey to Work data for the relevant MSOAs associated with the proposal. Our review indicates that the proportion of construction staff trips likely to interact with SRN is limited. When considering the forecast construction worker trip generation during the peak construction period, we are satisfied that the impact on the SRN during the AM and PM peak periods is unlikely to be material.<br><br>Our review indicates that the proportion of construction staff trips likely to interact with SRN is limited. When considering the forecast construction worker trip generation during the peak construction period, we are satisfied that the impact on the SRN during the AM and PM peak periods is unlikely to be material. | The Applicant welcomes National Highways' conclusion that the proportion of construction workforce trips interacting with the Strategic Road Network (SRN) is limited and notes its agreement that the proposed construction traffic associated with the Scheme is unlikely to materially affect the SRN during the AM and PM peak periods. |
| | 3.6 We acknowledge that suppliers for the solar farm have not yet been identified and therefore accept the use of indicative HGV routing assumptions at this stage. We note that HGV routing will be secured through the | The Applicant welcomes National Highways' confirmation that, notwithstanding that the contractors have not yet been identified, the use of indicative HGV routing assumptions is appropriate at this stage of the project. The |

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| | CTMP and welcome the inclusion of indicative routing in ES Figure 15-3 (APP-161 6.2 ES Figure 15-3: Heavy Goods Vehicle Routing). In relation to Appendix 15-3: Receptor Traffic Flows Table, we note that the PM Network Peak is currently reported for 16:00–17:00. We request that the applicant provides the receptor traffic flow data for the 17:00–18:00 peak period or clarification for the omission for our review. | Applicant also welcomes National Highways' acknowledgement that HGV routing will be secured through the Detailed Construction Traffic Management Plan (CTMP) and its support for the indicative routing presented on **ES Figure 15-3: Heavy Goods Vehicle Routing** [APP-161].<br><br>In relation to the request for traffic flow information for the 17:00–18:00 period, the Applicant notes National Highways' comments.<br><br>The PM peak period adopted within **ES Chapter 15: Traffic and Access** [APP-066] was derived from the baseline traffic survey data collected across the study area and forms part of the agreed assessment methodology developed through consultation with Lincolnshire County Council, Peterborough City Council and National Highways. The assessment identified the network peak periods as 08:00–09:00 and 16:00–17:00, and these periods were therefore used consistently throughout the traffic impact assessment to represent the AM and PM local network peaks.<br><br>The Scheme will not generate any additional traffic flows during the 17:00-18:00 peak. The **OCTMP** [APP-278] secures construction working hours that ensure that staff travel will occur outside of the 17:00-18:00 peak, and a |

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| | | Delivery Management Schedule that will ensure that HGVs avoid peak hours. |
| | 3.7 To support a robust assessment of potential impacts on the SRN, we recommend that the applicant provide further detail on the anticipated HGV routing strategy, including the forecast number of HGV trips expected to use the SRN and the indicative impacts at the relevant SRN junctions. Whilst we recognise that the suppliers have not yet been finalised, this information will support our understanding of the extent of likely impacts of construction traffic on the SRN. | The Applicant has provided supplementary information in Table 1 of Appendix A of **Statement of Common Ground with National Highways** (Doc Ref. 8.15) to assist National Highways' review, including:<br>• Forecast development traffic associated with the construction workforce, comprising workforce arrivals between 06:00-07:00 and departures between 19:00-20:00.<br>• Forecast HGV movements associated with the approved delivery management arrangements.<br>• Confirmation of the anticipated level of interaction with the Strategic Road Network (SRN) during the AM (07:00-10:00) and PM (16:00-19:00) network peak periods.<br>The two-way flows presented in Table 1 of Appendix A of **Statement of Common Ground with National Highways** (Doc Ref. 8.15) relate to Receptor L35, located on the A16 north of the A47 roundabout near Peterborough. This receptor represents the closest point in the assessment study area to the SRN and, therefore, provides an appropriate basis for assessing potential interaction with the SRN. As all development traffic using Receptor L35 would also be expected to pass through the A16/A47 |

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| | | (Dogsthorpe) Roundabout, this location represents the reasonable worst-case point for assessing SRN interaction.<br><br>The information presented demonstrates that:<br><br>• No development traffic is forecast during the AM network peak hour (08:00-09:00).<br>• No development traffic is forecast during the PM network peak hour (17:00-18:00).<br>• Workforce arrivals occur before the AM network peak.<br>• Workforce departures occur after the PM network peak.<br>• HGV movements are managed outside of the identified network peak periods.<br><br>In relation to road safety, it should be noted that the A16/A47 junction was not originally included within the Transport Assessment study area. However, collision data subsequently provided by Peterborough City Council indicates that only four slight injury collisions occurred at the junction during the most recently available five-year assessment period, with no serious or fatal collisions recorded. On this basis, the Applicant does not consider that there are any existing road safety concerns which would be materially exacerbated by the forecast increase in construction traffic associated with the Scheme. |

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| | | Taking account of the temporary nature of the peak construction period, the relatively low hourly HGV flows, and the strategic nature and capacity of the SRN, the Applicant does not consider that the forecast increase in HGV traffic would give rise to significant effects requiring detailed junction modelling. The Applicant therefore considers the assessment undertaken within **ES Chapter 15: Traffic and Access** [APP-066] to be proportionate and sufficient to demonstrate that the effects on the SRN would be negligible. |
| | 3.8 Figure 15-3: HGV Routing Plan (APP-250 6.3 ES Appendix 15-3: Receptor Traffic Flow Tables) does not show where HGV routes loads onto the SRN. We have inferred likely SRN connection points from the surrounding local road network; however, we require a more detailed supporting drawing or information that identifies the SRN junctions that will be used during the construction phase. | It should be noted that the HGV and AIL routing plans (**ES Figure 15-3** [APP-161] and **ES Figure 15-4** [APP-162]) do not identify connection points with the SRN as the closest SRN junction to the Scheme is the A47 Junction 20 (Dogsthorpe Roundabout), which is located more than 15 km south of the southernmost extent of the Order Limits. Construction traffic will enter and exit the study area using the A16, which is part of the Major Road Network (MRN). The MRN is the middle tier of England's road network, comprising the most economically important local authority "A" roads that sit just below the SRN.<br><br>As contractors, suppliers and transport arrangements have not yet been finalised, the precise SRN routes which will be used to connect any HGV and AIL movements to the MRN cannot currently be confirmed. Notwithstanding this, the Applicant has produced a geographically expanded |

| Topic | Matter Raised | Applicant's Response |
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| | | version of Figure 15-3 to show routes that could be taken. This has been appended to the **Statement of Common Ground with National Highways** (Doc Ref. 8.15) submitted at Deadline 1.<br><br>The Applicant welcomes National Highways' acknowledgement that these matters can be addressed through the Detailed CTMP process. Further details regarding AIL requirements, routing, swept path assessments, escort arrangements and any necessary traffic management measures will be developed in consultation with National Highways and the relevant Highway Authorities and will be set out within the Detailed CTMP prior to construction commencing. |
| | 3.9 The CTMP confirms that the primary routing for construction traffic will utilise the via A16, A151 and B1165 / B1166 / B1168, and direct access from the SRN is not anticipated. However, additional information is required regarding how construction traffic interacts with the SRN, including likely origins/destinations and routing beyond the immediate study area. | The Applicant notes National Highways' request for additional information regarding construction traffic interaction with the SRN. At this stage, the precise origins, destinations and routing of construction vehicles cannot be confirmed as contractors and suppliers have not yet been appointed – it should also be noted that the Port of Entry for the Abnormal Indivisible Loads (AILs) has not yet been confirmed.<br><br>Notwithstanding this, the Applicant has produced a geographically expanded version of Figure 15-3 to show routes that could be taken. This has been appended to the |

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| | | **Statement of Common Ground with National Highways** (Doc Ref. 8.15) submitted at Deadline 1. |
| | 3.10 Further detail is required on the routes for Abnormal Indivisible Loads (AILs) routes to/from the SRN. We seek clarification on the total number of AIL movements anticipated, including dimension and expected frequency. Details of height and weight constraints should also be provided for our review. The details of routing via the SRN will require a swept path analysis to demonstrate the junction can accommodate the abnormal load and be provided for our review. This will also help determine if escorting vehicles and/or temporary restrictions are required.<br><br>We welcome the commitment to provide a Framework CTMP for our further review by including National Highways as a consultee to requirement 15 of the dDCO (APP-028), which can be secured post consent and prior to the commencement of any construction works. | The Applicant welcomes National Highways' recognition that the Detailed CTMP will provide an appropriate mechanism to agree the detailed management of Abnormal Indivisible Loads (AILs) post-consent and notes its support for being consulted through Requirement 15 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). To clarify, the **OCTMP** [APP-278] has been submitted, and Requirement 15 of the **Draft DCO** (Doc Ref. 3.1 Rev 2) will ensure that the relevant local highway authority and National Highways are consulted on the Detailed CTMP, which will be in substantial accordance with the **OCTMP** [APP-278].<br><br>It should be noted that the HGV and AIL routing plans (**ES Figure 15-3** [APP-161] and **ES Figure 15-4** [APP-162]) currently do not confirm the exact routing via the SRN as the details of the origins of construction equipment and materials are not yet known. The HGV and AIL construction routes connect the site to the A16, which is on the Major Route Network (MRN). The Applicant has produced a geographically expanded version of Figure 15-3 to show the A16 connections to the SRN. This has been appended to the **Statement of Common Ground with National Highways** (Doc Ref. 8.13) submitted at Deadline 1. The connections between the SRN and the MRN, and between the SRN and Port infrastructure, will have been |

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| | | designed to accommodate the movement of HGVs and AILs.<br><br>As stated in the **OCTMP** [APP-278], a limited number of AILs will be required during the construction phase of the works, such as for the delivery of transformers, cable drums and overhead line components.<br><br>The largest abnormal vehicle anticipated during the construction phase would comprise an approximately 57.6 m long 16-axle trailer required to transport a 178 tonne transformer to the Solar Development Areas via access points BB-01, MR-01, QB-01 and A16-01. These movements would comprise one-way trips to the Site, with the vehicle subsequently being dismantled and departing as a standard vehicle. Additionally, a smaller abnormal load vehicle of approximately 19.3 m long six-axel will be required to deliver transformers to Land Parcel D via Access LGR-05, as well as a 28.6m abnormal load vehicle which will be required to deliver overhead line components to a number of Grid Connection access points. Further details of these movements are set out within Annex C of the **OCTMP** [APP-279].<br><br>At this stage, the precise origins, final routing, dimensions and weight of all AILs and any associated escort requirements cannot be fully confirmed as contractors, suppliers and transport arrangements have not yet been finalised. The Applicant therefore welcomes National |

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| | | Highways' acknowledgement that these matters can be addressed through the Detailed CTMP process.<br><br>Necessary traffic management measures will be developed in consultation with National Highways and the relevant Highway Authorities and secured through the Detailed CTMP prior to construction commencing. Moreover, a specialist haulage contractor will be appointed to manage AIL deliveries, including the provision of any required escorts, permits and traffic management arrangements. The relevant Highway Authorities and Police will be consulted in accordance with the Road Vehicles (Authorisation of Special Types) Order 2003. The Applicant therefore considers that the proposed approach is proportionate to the current stage of project development. |
| | 3.11 We understand that the Delivery Management System should detail the procedure for monitoring the schedule of HGV and LGV arrivals and departures to prevent congestion at key access points onto the local road network. | The Applicant acknowledges National Highways' understanding of the purpose of the Delivery Management System (DMS). As set out in the **OCTMP** [APP-278], the DMS will manage and monitor HGV and LGV arrivals and departures through timed delivery slots and associated traffic monitoring measures, ensuring that vehicles do not queue on the public highway or cause congestion at site access points. Further details will be developed through the Detailed CTMP prior to the commencement of construction. |

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| Outline Construction Environmental Management Plan | 3.12 We welcome the commitment to provide a detailed CEMP for our further review by including a requirement to consult National Highways on the construction environment management plan at requirement 12 of dDCO (APP-028) following the appointment of a principal contractor and prior to commencement of any construction work, this can be secured post consent. | Noted, no further response required. |
| | 3.13 In relation to the traffic management, we welcome clarification on the points raised in the sections above regarding the wider SRN routing points, AILs details, and the commitment to manage and monitor construction traffic to ensure the safe operation of the SRN.<br><br>3.14 Based on the ES submitted at the pre-application stage for the Meridian Solar Farm project, we recommend that the applicant provide the additional information requested on the points raised above to facilitate our review. This is to ensure that we have a comprehensive understanding of the likely impacts of the proposal on the SRN. | Applicant's responses to these comments are set out in rows above. |
| Note | 3.15 These comments relate specifically to matters arising from National Highways' responsibilities to manage and maintain the SRN in England, in line with DfT's Circular 01/2022 to support sustainable delivery of growth. For comments related to the local road network, please consult the appropriate local highway | The Applicant is undertaking separate engagement with LCC, with agreement on traffic and access matters being tracked through the **Statement of Common Ground with LCC** (Doc Ref. 8.11). |

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| | authority. The Local Planning Authority will determine the final scope of the Environmental Statement. | |
| Summary | 4.1 National Highways is generally satisfied that construction traffic associated with the development is unlikely to have a material impact on the SRN, particularly during peak network periods. However, further information is required to fully understand and assess construction traffic impacts on the SRN. NH seeks additional evidence on construction traffic routing, SRN junction usage, HGV numbers, and abnormal load movements before it can complete its assessment. | Applicant's detailed responses to each of the queries raised are provided in rows above. |

## 3.11. Natural England

3.11.1. Table 3-11 below sets out the Applicant's response to the issues raised within the Relevant Representation from Natural England [RR-140] including signposting to the relevant sections of the DCO Application.

**Table 3-11: Natural England**

| Topic | Matter Raised | Applicant's Response |
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| Internationally Designated Sites | | |
| **NE1 -**<br>Identification of sites | HRA Report [APP-217] section 3.3 sets out the screening area used and relevant sites identified for the assessment. NE considers that all relevant European Sites have been identified; agrees that consideration of Barnack Hills and Holes SAC and Orton Pit SAC is not necessary. | Noted, no further response required. |
| **NE2 –**<br>Baseline Data | NE has agreed an evidence plan for the project's HRA via our Discretionary Advice Service (DAS). This evidence plan is included in HRA Report [APP-217] Appendix 2. NE considers relevant desk data and survey has been carried out in order to inform the HRA. | Noted, no further response required. |
| **NE3 -**<br>IIWS Qualifying Species | It is important to note that any wetland bird species would be considered to qualify for the Waterbird Assemblage (non-breeding) for The Wash. | The supporting wintering bird reports (**ES Appendices 9-4 to 9-6** (Doc Ref. 6.3 Rev 1) have been updated for Deadline 1 to acknowledge that any wetland bird species would be considered to form part of the Waterbird Assemblage for The Wash. |

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| | The HRA has included consideration for the overall waterbird assemblage feature; so NE raise no major concerns on this point.<br><br>Ensure that any table listing species (eg primary Focal Species or Tables 3.2 of both Wintering Bird Survey Reports) acknowledges that any wetland bird would be considered an IIWS qualifying species for The Wash (especially if it is a record/observation from within typical range for The Wash). | |
| **NE4 -**<br><br>Impact Pathways Considered | HRA Report [APP-217] Table 4, identifies relevant impact pathways based on the Site Improvement Plans, IRZ criteria and other known sensitivities. NE considers that all relevant impacts from the proposed development have been identified for further consideration in the screening assessment:<br><br>Impacts on Functionally Linked Land (FLL)<br><br>Direct impacts on individuals of qualifying species<br><br>Air pollution<br><br>Water pollution<br><br>NE's comments on the Stage 1 Screening Assessment for each impact pathway are set out below.<br><br>Whilst impacts to FLL have been considered, Table 4 should specifically reference noise and visual | The Applicant's response is provided under NE7. **ES Appendix 9-14: HRA Report** (Doc Ref 6.3 Rev 1) has been updated for Deadline 1 to address relevant points, including additional detail in Table 4 regarding impact pathways on FLL. |

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| | disturbance on birds using FLL; NE has made further comment on this at **NE7**. | |
| NE5<br>Stage 1 – Impacts on Functionally Linked Land (FLL) – Ornithology / Identification of FLL | HRA Report [APP-217] 4.4.3 to 4.4.10 discusses four areas the applicant has identified as FLL. These are also illustrated at HRA Figure 3.<br><br>Whilst NE concurs that the 4 areas identified are likely to constitute functionally linked land, the method used to reach this conclusion, and to rule out any other areas of FLL within the order limits or in close proximity, is unclear.<br><br>NE's Section 42 Response stated:<br>'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 NatureScot) 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. | An updated **ES Appendix 9-14: HRA Report** (Doc Ref 6.3 Rev 1) has been submitted at Deadline 1 to clarify the process to determine FLL. The Applicant has considered areas where SPA species occur as potential FLL but only determined areas to be FLL, where they provide functional value to the relevant SPA. This is a semantic variation in the application of FLL from NE's response, but the process aligns with NE's stated expectations in identifying and assessing all areas with potential to provide functional value in relation to relevant species. The assessment of potential FLL did not identify any of these areas within the Order limits as supporting significant function in relation to the relevant species, so no FLL is considered to fall within the Order limits.<br><br>To clarify the application of this process, additional detail has been provided within **ES Appendix 9-14: HRA Report** (Doc Ref 6.3 Rev 1), wherever SPA species have been recorded to present the process of determining whether or not these locations are FLL, in line with the key considerations presented in NE's response. |

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| | 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?'<br><br>It is unclear where this assessment has taken place.<br><br>Further information should be provided regarding the process used to identify areas of Functionally Linked Land.<br><br>Justification should be provided as to why none of the order limits have been considered as FLL; where this is not possible, additional FLL should be included for assessment. | |
| NE6<br>Stage 1 – Impacts on Functionally Linked | HRA Report [APP-217] Paragraph 4.4.13 states:<br>'The Scheme has been designed to take account of baseline ecological data and avoids loss of habitats | With reference to Applicant's response to NE5, where SPA species occur within the Order Limits, the determination of functional value in relation to the SPA |

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| Land (FLL) – Ornithology / Direct Loss of FLL | within these potential areas of FLL, and incorporates buffer zones to minimise the risk of damage or disturbance. On the basis of the nature, scale and location of the Scheme, and noting that the Scheme would not result in direct land take within areas identified as potential functionally linked land (FLL), there is no plausible impact pathway by which the Scheme could result in a likely significant effect on qualifying features of The Wash and North Norfolk Coast SAC, The Wash SPA and Ramsar, or the Nene Washes SPA and Ramsar as a result of loss of FLL.'<br><br>The surveys and desk study results appear to indicate species of importance to the nearby designated sites within the proposed development area and so it is difficult to understand how there is no land-take in those areas that would affect FLL.<br><br>Vantage Point Survey Report (APP-213) paragraph 4.4 states low numbers of Golden Plover were noted during nocturnal surveys. It is important to note that golden plover regularly split into smaller flocks during the night even when pre roosting behaviour involves a larger flock. As such a 'core' roosting area may be spread over several fields/ locations. This is similarly true for lapwing. | has been detailed within the updated **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 1) at Deadline 1. Effects in relation to FLL would only be considered if there were impacts to areas which were identified as being of functional value. For clarity, **ES Appendix 9-14: HRA Report** (Doc Ref 6.3 Rev 1) submitted at Deadline 1 has amended the use of "*potential* areas of FLL" with "*identified*' areas of FLL" as at this stage of report, the potential areas (i.e. those with suitable habitat where SPA species were recorded) have been assessed to determine if they are considered to have functional value in relation to the SPA. As noted under NE5, the review of potential FLL identified no areas within the Order limits that are considered to provide significant supporting function.<br><br>Vantage point surveys identified higher numbers of golden plover to the west of the Grid Connection Route and line markers are proposed to be installed adjacent to this area to mitigate collision risk. It can be expected that golden plover and lapwing will make use of fields across a wider area, especially during night roost dispersion, but the daytime and nocturnal surveys to do not indicate significant numbers of flights, even in aggregate, within the collision risk zone that would warrant extending marker locations further along the Grid Connection Route. |

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| | It is also stated that that scheme design has been designed to take account of potential areas of FLL, but little further information is provided to explain where this has taken place.<br><br>Alongside the information requested at NE5, further reasoning should be provided to justify the statement that there will be no direct land-take within FLL.<br><br>Further information should be provided to demonstrate how survey results have been used to inform scheme design to avoid impacts to FLL. | As noted in paragraph 4.4.17 of **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 1), the evolving design of the scheme identified a preferred corridor for the potential location of the Grid Connection Route running to the east of this area of FLL. Taking account of the emerging survey results, the refined Grid Connection Route was subsequently located in the east of this corridor, minimising the potential for impacts on FLL. |
| NE7<br>Stage 1 – Impacts on Functionally Linked Land (FLL) – Ornithology / Noise and Visual Disturbance to FLL | There is no assessment of noise or visual disturbance impacts within the HRA. Regardless of any potential additional functionally linked land (See NE5), it is unclear how noise/disturbance impacts to the four identified areas of FLL have been screened out. Three of the four areas lie directly adjacent to the order limits; so noise and visual disturbance in these areas would be expected during construction and decommissioning.<br><br>NE notes that Chapter 13, Noise and Vibration, 'does not include the assessment of noise and vibration on ecological or heritage receptors' (APP-064, paragraph 13.1.5). Where FLL is identified in proximity to the | The OCEMP (Doc Ref 7.10 Rev 2) and ODEMP (Doc Ref 7.12 Rev 1) have been updated to include specific reference to FLL and the measures that will mitigate potential effects arising from noise or visual disturbance, including timing of works, screening and buffers. These updated documents have been submitted at Deadline 1.<br><br>**ES Appendix 9-14: HRA Report** (Doc Ref 6.3 Rev 1) has been updated to screen these impacts into the Appropriate Assessment so that the effects are assessed specifically taking account of these measures. Further consideration of noise contours arising from peak potential disturbance events have been reviewed to provide further detail of where significant effects could |

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| | order limits, it may be appropriate to include this as a receptor in the Noise chapter, and/or for noise contours to be provided to inform the HRA. Chapter 9, Ecology and Biodiversity (APP-060) also makes limited assessment of noise and visual impacts to SPA birds.<br><br>Little information is provided with regard to the buffer zones referenced at paragraph 4.4.13, for example, where they are, how large they are and what mitigating effect they may have concerning noise. Minor reference is made to the 'further precautionary controls' that are embedded within the CEMP and DEMP to mitigate impacts from noise and visual disturbance, however, these measures are limited to best practice construction measures, which are welcomed, but may not address impacts to specific sensitive ecological receptors (i.e. areas of functionally linked land directly adjacent to the order limits). No consideration has been given to the avoidance of the wintering period for the most disturbing construction activities.<br><br>NE advises that Likely Significant Effects from disturbance to FLL should be screened in, with further assessment of noise and visual disturbance being provided within the Appropriate Assessment. | occur and the measures within the **OCEMP** (Doc Ref. 7.10 Rev 2) would need to be applied. |

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| | Any additional mitigation measures required to avoid noise/visual disturbance effects during construction and decommisisoning must be detailed in the oCEMP/oDEMP. | |
| NE8<br>Stage 1 – Impacts on Functionally Linked Land (FLL) – Ornithology / Predator Shadows | HRA Report [APP-217] 4.4.17 discusses potential impacts from a perceived predator shadow.<br>NE generally concurs with the rationale provided, although it should also be noted that species such as Golden Plover are known to avoid prominant field edges such as hedges (of any height) and avoid being within 100m or more of such features. This is likely to include the edges of fields containing solar panels, however, as the Solar PV is located within existing field boundaries, with existing boundary features, significant effects from a predator shadow effect are considered unlikely.<br><br>NE note the routing of the cable route and OHL 200-300m from the Northern-most area of identified FLL, which is likely to avoid any such effects in this area. Nonetheless, further consideration of impacts from a predator shadow effect may be necessary should any additional FLL be identified in closer proximity to the Order Limits (see NE5).<br><br>See NE5. Further consideration of impacts via a | Noted, see Applicant's response to NE5. |

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| | predator shadow effect should be made where any additional FLL is identified. | |
| NE9<br>Stage 1 – Impacts on FLL - Otter | HRA Report [APP-217] 4.4.11 to 4.4.16 Discuss the use of the site and it's surrounds by Otter, a qualifying feature of The Wash & North Norfolk Coast SAC.<br><br>NE notes the identification of the River Welland and South Holland Main as part of Otter territories, but concurs with the applicant's assessment that a likely significant effect on this species as a result of impacts to functionally linked land can be ruled out.<br><br>The scheme design has ensured there is no direct loss of key functionally linked habitats along these watercourses, and embedded measures, such as those set out in CEMP Table 3-5 (APP-275, p40-41) for Otter and Water Vole, are likely to avoid any significant disturbance to the species. These include, buffering of watercourses, avoidance of night works & pre-construction survey.<br><br>It is also acknowledged that the intervening distance between the SAC and the order limits is also significant; there is availability of alternative habitat within the catchment, which copudl be utilised during any temporary disturbance. | Noted, no further response required. |

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| | NE welcomes acknowledgement that should any preconstruction survey show significant new evidence of Otter in areas required for the scheme, that a protected species licence would be required to proceed; and must be applied for in the usual way. This legislative requirement provides further certainty that significant effects could be avoided and/or mititgated effectively through the licencing regime.<br><br>The CEMP & DEMP, containing embedded measures which will ensure avoidance of effects to Otter, are secured by DCO Requirements 12 and 21, respectively. | |
| NE10<br>Stage 1 – Direct impacts to species – Ornithology (collision) | HRA Report [APP-217] paragraphs 4.4.19 to 4.4.30 discuss the potential effects of collision.<br><br>The data presented at Figure 4 and discussed at paragraph 4.4.22 is helpful, relating to desk study hotspots and movement corridors, however, with this figure being based solely upon desk based data, it does have significant limitations and should not be relied upon to draw any conclusions in isolation. The applicant has considered this data appropriately; it does provide helpful context, indicating that the grid connection route does not cross any major flight lines. | Noted, no further response required. |

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| | It is welcomed that our previous advice has been taken on board with regard to collision risk modelling; understanding the limitations of this. It is welcomed that modelled outputs are not relied on in isolation to screen for likely significant effects (paragraph 4.4.23).<br><br>A screening threshold of a modelled 1% change in baseline mortality is discussed at paragraph 4.4.24; NE would like to clarify that we do not endorse the use of any such screening thresholds. Our pre-app advice on this matter noted historic use of this threshold, but was clear that reliance on a threshold approach to screening out LSE is not recommended, owing to the uncertainties around modelling, particularly when concerning OHLs. Nonetheless, the applicant does go on to state that this 'should not be relied on alone, given the limitations of using the collision risk model, but will be taken in the context of wider qualitative assessment', which is welcomed.<br><br>Table 5 sets out the modelling results, identifying Golden Plover as the only species with a predicted increase in mortality of over 1%. The Golden Plover population that over-winters on The Wash is of international importance and as such is considered to be a main component species within the Waterbird | |

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| | Assemblage. The Conservation Objective to maintain the population of this species therefore applies. NE therefore welcomes the consideration of Golden Plover and the statement that 'it is reasonable to treat as a qualifying feature for consideration of likely significant effects' at paragraph 4.4.26.<br><br>Table 5 also illustrates a 0.79% increase in mortality for Whooper Swan. This species is not discussed at Stage 1 of the HRA. With this modelled risk, alongside significant flight durations of Whooper Swan being observed in the 10-25m range in the Vantage Point Surveys (APP-213), NE considers this to indicate Whooper Swan are at risk of collision from the scheme. As the collision risk impact pathway has been screened in due to the risk to Golden Plover, further consideration of Whooper Swan is unlikely to change the outcome of the stage 1 screening assessment, so NE raises no significant concern at this stage.<br><br>It is also welcomed that Common Crane have been considered within the assessment. Despite an absence of survey data indicating Crane flights at collision height, Cranes were recorded in the area of the OHL, and the species is known to be able to fly at collision height and be susceptible to collision. They also fly in groups and there is potential for a whole group to | |

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| | collide at once. As such we welcome recognition that, a single collision would constitute a significant effect to this recently established population.<br><br>Overall, NE concurs with the conclusion that LSE cannot be ruled out for Collision risk in relation to the Wash SPA/Ramsar and Nene Washes Ramsar. | |
| NE11<br>Stage 1 – Direct impacts to species - Otter | HRA Report [APP-217] 4.4.18 states that as a result of embedded measures within the CEMP & DEMP, no direct impacts are predicted for Otter. NE concurs with this conclusion & as set out at NE9, the general mitigation measures in the CEMP are considered suitable to avoid a significant effect on Otter associated with the Wash and North Norfolk Coast SAC.<br><br>The CEMP & DEMP, containing embedded measures which will ensure avoidance of effects to Otter, are secured by DCO Requirements 12 and 21, respectively. | Noted, no further response required. |
| NE12<br>Stage 1 – Air Pollution | Natural England has produced 'Standard Advice for Air Quality Impacts in Nationally Significant Infrastructure Projects' (See Annex B attached) and have no bespoke comment to provide with regard to air quality impacts. | Noted, no further response required. |

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| NE13<br>Stage 1 – Water Pollution | HRA Report [APP-217] 4.4.39 to 4.4.42 discusses potential impacts from water pollution.<br><br>It is concluded that due to the nature of the proposed works, and standard construction practices, no LSE is predicted. Both the oCEMP [APP-275] and oDEMP [APP-277] tables 3-6 and 3-7 include numerous best practice pollution prevention measures which are to be implemented during construction and decommissioning.<br><br>Where these measures are implemented as planned, NE concurs with the conclusion that significant effects from water pollution during construction and decommissioning can be ruled out on this basis. It is also noted that these measures are considered best practice, and thus would not constitute mitigation measures specifically used to avoid an impacts upon a European site.<br><br>NE also concurs that water pollution effects during operation are unlikely.<br><br>The CEMP & DEMP, containing embedded measures which will ensure avoidance of effects via water | Noted, no further response required. |

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| | pollution, are secured by DCO Requirements 12 and 21, respectively. | |
| NE14<br>Stage 1 - Screening Conclusions | NE concurs with all of the applicant's stage 1 screening conclusions, with the exception of impacts on FLL for Ornithology (See items NE5-8).<br><br>A summary of NE's agreement with the Stage 1 Screening and Stage 2 Appropriate Assessment is included at Annex A of this response, for ease.<br><br>See items NE5-8. | Applicant's responses to NE5-8 are provided in rows above. |
| NE15<br>Stage 2 - Direct impacts to species – Ornithology (collision) | HRA Report [APP-217] paragraphs 5.2.1 to 5.2.10 discuss collision risk and mitigation considerations.<br><br>The potential for undergrounding of the cable route has been considered by the applicant at Chapter 3. HRA paragraph 5.2.6 states that undergrounding of the route may have greater impacts to wintering birds foraging and roosting in the area. NE disagrees with this, and notes that whilst temporary impacts to wintering birds would be anticipated during construction of an underground cable, the overhead line introduces a permanent collision risk. Ultimately, the decision to use overhead cables instead of underground cables for the grid connection must be considered by the Secretary of State in line with NPS | The Applicant does not consider that paragraph 5.3.6 of **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3 Rev 1) overstates the potential for impacts on wintering birds from the undergrounding option, so no change is proposed to this text.<br><br>Consultation on the detailed design of bird diverters with Natural England has been secured through the updated **OOEMP** (Doc Ref. 7.11 Rev 1) submitted at Deadline 1.<br><br>The Applicant considers that it is not appropriate to rely on monitoring as mitigation to support the conclusions of the HRA and considers that the assessment and conclusion of no significant effect without it is robust. While the viewsheds of the vantage points do not completely cover the entirety of the Grid Connection |

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| | EN-5 paragraphs 2.9.25-26.<br><br>Consideration has been given to the routing of the Overhead Cables, being sited to the east of the corridor to somewhat avoid the surveyed hotspots for Golden Plover (paragraph 5.2.5), but it is acknowledged this will not avoid the risk altogether and further mitigation is proposed in the form of line markers.<br><br>The use of Line Markers to reduce collision risk is welcomed. NE concurs with the applicant's conclusion regarding the two areas identified as having increased risk of collision for both Golden Plover and other higher collision risk for cranes, geese and swans, and that these areas should be fitted with line markers (illustrated at HRA Figure 5). Nonetheless, as the section between these two areas has not been subject to Vantage Point survey, NE recommends that a scheme of monitoring for collision should be undertaken once the scheme becomes operational. Should collision be reported, additional line markers should be considered. The monitoring scheme could be designed to mimic the VP survey effort undertaken. This would provide a direct comparison between the modelled collision risk and the actual collision risk, which would provide invaluable information to inform | Route, the coverage and survey effort is reasonable and proportionate and provides sufficient representative data to inform the assessment. However, Table 3-5 of the **OOEMP** (Doc Ref. 7.11 Rev 1) sets out that the diverters will be checked along with other overhead line checks, and replaced, as required. Year-1 post-installation monitoring and incident logging (diurnal/nocturnal Vantage Point checks, where appropriate) will be undertaken. |

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| | future projects' collision risk assessments and modelling.<br><br>The change line markers are likely to have on the modelling outputs has been shown at paragraph 5.2.8. It is acknowledged that the exact model of line marker to be used is yet to be determined. As a result, the use of the lowest (worst performing) risk reduction rate in the figures presented here is welcomed, in line with the precautionary approach. The detailed design of line markers, including model, frequency of use and exact locations, must be undertaken in consultation with Natural England.<br><br>Commitment must be made for the detailed design of line markers, including choice of model, frequency of use and exact locations, to be undertaken in consultation with Natural England.<br><br>Commitment should be made for a scheme of monitoring for collision along the length of the OHL to be undertaken during operation.<br><br>NE recommends the detailed design of line marker deployment is secured within the DCO, including requirement for consultation with NE. For example at DCO Requirement 5 (Detailed Design Approval). | |

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| | Similarly, NE recommends a scheme of monitoring for collision is secured within the DCO. | |
| NE16<br>Stage 2 – Direct impacts to species – Ornithology (collision) / Collision Risk Modelling | Further detail regarding the collision risk modelling conducted has been provided by the applicant at Appendix 9-15 (APP-218).<br><br>It is acknowledged that specific guidance on modelling of collision risk for onshore Overhead Lines is not currently available. The applicant has engaged positively with NE to inform their approach to this model.<br><br>The general approach to the model, following the principles of the NatureScot onshore wind turbine model, is considered suitable; NE generally agrees with the approach taken to the overall assessment of collision risk, which has considered desk data, survey results, local expertise and modelling outputs.<br><br>NE's advice specific to the model is set out below:<br><br>NE does not agree with the rationale provided for the use of the 'Alignment Factor', set out at paragraph 2.2.12 to 2.2.13 (APP-218). It is unclear how the discussed model has been parameterised to be made | Given the limited available data on collision rates for overhead lines, the alignment factor within **ES Appendix 9-15** [APP-218] allows for better representation of the relative collision risk, drawing on the Band collision model, which is more robustly tested. It is acknowledged that collision rates for wind turbines will be different to those for overhead lines, so the alignment factor is not intended to make the model outcomes match. It does, however, with significant degree of precaution, allow for the models to be brought into a reasonable order of alignment. |

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| | comparable with the scheme, nor do we consider there to be sufficient reason to assume that one model can inform the other to justify such a significant lowering of collision risk. Nonetheless, given the significant uncertainties inherent in the whole process, the model outputs have served their primary purpose to identify the high-risk species and locations. This information has then been considered 'in the context of wider qualitative assessment' within the HRA and mitigation applied appropriately. Thus, whilst Natural England does not agree with this alignment factor, we do not consider it would alter the outcome of the assessment in this instance.<br><br>NE notes the use of species specific Avoidance Factors based on guidance published for onshore wind farms (paragraph 2.2.14), with an assumption of the lowest avoidance factor where data is limited. It is worth noting these factors are not purely estimates of the proportion of birds that will avoid an obstacle, but instead model correction factors that are specific to the wind turbine Band Collision Risk Model. Nonetheless, NE considers the approach taken to be suitable and based on the best available evidence.<br><br>The Alignment Factor used in the model should be omitted, or further rationale and information regarding | |

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| | the parameters used in the model used to inform it could be provided. | |
| NE17<br>Stage 2 – Incombination Assessment | NE specifically notes the potential for additionality of impacts through collision risk with the Grimsby to Walpole and Weston Marsh to East Leicestershire (WMEL) projects, which both propose additional Overhead Lines in proximity to this scheme.<br><br>It is acknowledged that both of these projects are yet to reach a stage in design where significant collision risk assessment or modelling has been undertaken, so a quantitative in-combination assessment is not possible at this stage.<br><br>In-combination effects from collision from both the Meridian Solar Project and these two additional schemes will need to be considered quantitively by these projects as they come forward.<br><br>NE recommends that collision risk data associated with the Meridian project should be made available to the Grimsby to Walpole and WMEL projects to ensure they are able to carry out a full quantitative incombination assessment. | Comment received and acknowledged. No further response required although the Applicant agrees that the collision risk modelling data can be shared with NGET upon request. |

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| NE18<br>Appropriate Assessment Conclusions | Overall, subject to the detailed design of line markers and monitoring of collision, NE concurs with the conclusions reached regarding Collision risk. However, it is advised that impacts to functionally linked land are considered within the Appropriate Assessment.<br><br>A summary of NE's agreement with the Stage 1 Screening and Stage 2 Appropriate Assessment is included at Annex A of this response, for ease.<br><br>See NE7. | Applicant's responses to these comments are set out in rows above. |
| **Nationally Designated Sites** | | |
| NE19<br>Identification of Sites | NE welcomes the extensive use of our Impact Risk Zones (IRZs) to identify potential impacts and considers all relevant SSSIs have been identified.<br><br>NE welcomes the identification of all SSSIs as being of National Importance (Table 9-6). | Noted, no further response required. |
| NE20<br>Impact Assessment – Underpinning SSSIs | NE welcomes that all relevant SSSIs which underpin European designations, even where these are beyond the relevant SSSI IRZs, have been identified and noted in Table 9-6 and scoped into further assessment in Table 9-13.<br><br>NE has no further advice regarding potential impacts | Noted, no further response required. |

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| | to The Wash SSSI, the Nene Washes SSSI and Baston Fen SSSI. The assessment of impacts to the qualifying features of the overlapping European designations is considered to cover any relevant impacts to the SSSIs' notified features. See our advice regarding these sites at NE1-18.<br><br>It is welcomed that impacts to the Unattributed IRZ (centroid TF 3499 1700) have been considered in the ES. 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 within the assessment of impacts to the qualifying features of the overlapping European designations. No further sites or impacts pathways need to be reviewed as a result of this IRZ. | |
| NE21<br>Impact Assessment – Cowbit Wash | NE concurs with the assessment of impacts to Cowbit Wash SSSI in Table 9-14 that there is no potential for effects beyond those via Air Quality.<br><br>As noted at NE12, NE refers to our standard advice (See Annex B) regarding Air Quality impacts from Traffic emissions and has no further comment at this stage. | Requirement 12 of the **Draft DCO** (Doc Ref. 3.1 Rev 2) secures a Construction Environmental Management Plan which must be substantially in accordance with the certified **OCEMP** (Doc Ref. 7.10 Rev 2). The **OCEMP** (Doc Ref. 7.10 Rev 2) includes a commitment to prepare and implement a Dust Management Plan. The Applicant therefore considers that appropriate provision is made within the **Draft DCO** (Doc Ref. 3.1 Rev 2) to secure dust management measures. |

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| | The CEMP is secured by DCO requirement 12; specifies the need for a dust management plan to be produced post-consent. | |
| **Designated Landscapes** | | |
| NE22<br>Designated Landscapes | The proposed development is not located within, or within the setting of, any nationally designated landscapes. As a result, NE has no specific comments to make on the landscape implications of this development.<br><br>For advice on wider landscape issues, NE refers to the local planning authorities and other local bodies. | Noted, no further response required. |
| **Protected Species Licencing** | | |
| NE23<br>Water Vole Licencing Approach | The Otter and Water Vole Report [APP-210] discusses the likely need for a protected species licence for impacts to ditches where water voles are present. This is due to the need for both improvements to existing crossing points and one new crossing point (PV-A-03).<br><br>As set out at paragraph 5.4 of the Otter and Water Vole Report, NE has been in discussion with the applicant with regard to the licencing approach for Water Vole, and is in agreement with the proposal as it stands. Due to the nature of the CL31 licence, which is issued to an ecologist to act under a pre-approved | Noted, no further response required. |

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| | set of rules, the proposed approach would not require an individual (site specific) A11 licence to be applied for. Hence, it was not considered necessary for the applicant to submit a draft licence application to NE or request a LoNI during the Pre-App period.<br><br>Should pre-construction surveys indicate that the CL31 licence approach is no longer viable, then it may be necessary for a full A11 licence, to be applied for and issued prior to works starting. | |
| NE24<br>Other Protected Species Licencing | No further licence need has been identified by the applicant. NE welcomes the approach taken to avoid impacts as much as possible in line with the mitigation hierarchy.<br><br>As stated, where further pre-construction survey or detailed design reveals the need for any protected species licences from NE, further consultation will be required and these licences will need to be applied for in the usual manner. | Noted, no further response required. |
| NE25<br>Disapplication of Legislation | Draft DCO Part 2, section 4 (2) is clear that 'this article does not relieve the undertaker of any requirement to obtain any permit or licence under any other legislation that may be required from time to time to authorise the operation of an electricity generating station or overhead electric lines'. | The Applicant notes Natural England's comments and welcomes its acknowledgement of Article 4(2) of the **Draft DCO** (Doc Ref. 3.10 Rev 2). |

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| | NE welcomes this clarity and notes it will apply to any requirement for a protected species licence during operation of the scheme. | |
| **Soils and Best & Most Versatile Land** | | |
| BMV1<br>Scheme design and avoidance of BMV land | It is welcomed that Chapter 3, Alternatives and Design Evolution (APP-054) includes Design Principle 6, to avoid infrastructure within Best and most versatile (BMV) land, with a preference for the lowest grade available for areas likely to host hard standing infrastructure, where practicable. This approach is in line with NPS EN3, paragraph 2.10.21.<br><br>Agricultural Land Classification and type have also been considered by the applicant during site selection. The Site Selection Report (APP-264) paragraph 3.3.26 states 'that there is no land of sufficient scale for a 750MW solar farm that is located within proximity to the PoC which does not have a high likelihood of BMV land, making complete avoidance of BMV agricultural land impossible for the Scheme', which is noted.<br><br>The Site Selection Report, paragraphs 3.4.5 to 3.4.14 then set out how the initial reconnaissance ALC survey, and then subsequent detailed level ALC surveys, have been used to avoid infrastructure on the | The Applicant welcomes Natural England's position on the consideration of alternatives and design evolution with respect to BMV land.<br><br>As described within **ES Chapter 3: Alternatives and Design Evolution** [APP-054], the design has sought to avoid permanent impacts on highest grades of agricultural land. This can be evidenced from the placement of the three 132 kV On-Site Substations on Grade 3b land, albeit it has not been possible to avoid the use of Grade 1 and Grade 3a land for the On-Site 400 kV Substation and BESS Compound, due to other environmental and engineering constraints. Furthermore, over 69ha of agricultural land, including Grade 1 land, has been set aside as a Habitat Management Area, where arable use would be continued with enhanced practices for ground-nesting birds. Landscape planting, including shrubs and trees, have only been placed on field boundaries with no blocks of woodland proposed, to minimise permanent impacts on BMV land. |

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| | highest grade agricultural land. It is noted that areas initially graded as Grade 1 were removed from the development and proposed for ecological enhancements which retain the soil resource, however, following subsequent detailed ALC survey, large areas have been downgraded from grade 1 and infrastructure has been re-introduced. See items BMV2-8 for NE's comments on the final ALC survey methods and findings.<br><br>Nonetheless, it is noted in Chapter 5 (APP-056), paragraph 5.7.3 that over 69ha of Grade 1 and 2 agricultural land within Habitat Management Area 6 has been excluded from physical development and will be kept in arable use and managed to provide biodiversity benefits. This is welcomed.<br><br>The intent to avoid the highest grade agricultural land for permanent elements of the development is clear within the ES, however it is noted that small areas of Grade 1 and 2 land are to be used for the Substation/BESS. Justification for this has been provided at paragraph 3.4.10 of the site selection report (APP-264): due to constraints relating to the routing of the cable corridor and competing constraints with alternative solutions. | In accordance with the **OSMP** (Doc Ref. 7.14 Rev 1), during decommissioning, reinstatement works will aim to restore the land to its original grade. Further measures to minimise impacts on BMV land throughout the construction, operation and decommissioning phases of the Scheme are established and secured through compliance with the **OSMP** (Doc Ref. 7.14 Rev 1). |

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| | The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources and, as set out at NPS EN-3 paragraph 2.10.137, take into account the economic and other benefits of the best and most versatile agricultural land in their decision making. | |
| BMV2<br>ALC Survey Methodology – PV Area | NE has worked with the applicant during the preapplication period to agree an ALC survey methodology for the project. Whilst NE always advises that the ALC survey be undertaken at a density of 1 auger boring per hectare across the full order limits, during discussions with the applicant it was agreed that their survey effort could be reduced to 1 auger boring per 2 hectares in areas to be used solely for environmental enhancements, which did not require any soil handling activities.<br>It is welcomed that the remaining PV area was subject to ALC survey at a density of 1 auger boring per hectare. | Noted, no further response required. |
| BMV3<br>ALC Survey Methodology – Cable Corridor | It is always NE's advice that an ALC survey of the full order limits should be carried out pre-consent, to inform avoidance of the highest quality land as far as practicable, ensure the ES assessment is based on robust evidence, and to inform the Soil Management Plan. | 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 the Scheme, the influence of ALC grade on both the alignment and micro-siting of the Inter-Array |

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| | The applicant has not undertaken ALC survey of the Grid Connection Corridor; in the absence of survey data, the applicant's ability to avoid the highest quality land through scheme design has been limited. However, they have instead:<br>- Committed to undertaking ALC survey of the cable route post-consent, to inform the final Soil Management Plan, and<br>- Taken a worst-case scenario approach for the cable route within the ES, considering them to be entirely ALC Grades 1 and 2.<br><br>Whilst NE's advice remains that an ALC survey of the full order limits should be carried out pre-consent, in this instance it is considered unlikely to make a material difference to our advice or the outcome of the decisionmaking process.<br><br>oSMP Section 3.1 discusses the requirement for post-consent ALC survey of the cable route. DCO Requirement 19 subsequently secures the development of the final Soil Management Plan substantially in accordance with the outline soil management plan. NE considers this to be suitably secured. | Connections and Grid Connection Route is inherently constrained. 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, as set out within Section 3.1 of the **OSMP** (Doc Ref. 7.14 Rev 1). This reflects accepted practice on comparable NSIPs where the precise alignment or construction corridor cannot be fixed prior to consent. Examples include the Tillbridge Solar Project, Sunnica Energy Farm and Yorkshire GREEN, where detailed soils data for linear elements were to be completed following design refinement. The approach adopted for the Meridian Scheme is therefore consistent with proportionate, design-led practice for NSIPs that include linear infrastructure elements.<br><br>As a worst-case assumption within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1), the entirety of the Grid Connection Route and the Inter-Array Connections have been assumed to comprise BMV land and have been assigned very high sensitivity It is noted that NE recognises that a survey is unlikely to make a material difference to the decision making process.<br><br>A survey will be conducted prior to construction to inform a detailed Soil Management Plan based on the **OSMP** (Doc Ref. 7.14 Rev 1). |

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| | | The Applicant notes Natural England's comments and welcomes its confirmation that Requirement 19 of the **Draft DCO** (Doc Ref. 3.1 Rev 2) appropriately secures the preparation and implementation of a final Soil Management Plan, including the post-consent ALC survey requirements set out in the **OSMP** (Doc Ref. 7.14 Rev 1). |
| BMV4<br>ALC Survey Methodology – Incomplete Survey | Whilst it is appreciated a detailed ALC survey has now been completed across the PV areas. It is noted that 27.95ha of parcels A and D were inaccessible due to dense crops and vegetation (APP-172) and have not been resurveyed. In similar instances for Parcels C and D, these areas were subsequently re-surveyed (APP-173, para 3.3.2). NE understands that access restrictions mean 100% coverage is not always possible, however, further discussion is expected with regard to the ex prapolation of data to inform the ES. In addition, 75.47ha of Parcels A & D have not been surveyed as a result of unexploded ordnance (UXO) risk. NE acknowledges the potential risks associated with UXO, however, with appropriate mitigation measures in place, we do not consider the potential for UXO to be a constraint to carrying out ALC surveys. Where there is an identified risk from UXO, the auger core and soil profile pit locations should be first cleared by a UXO specialist prior to the commencement of any intrusive works. Where there | Section 3.1 of the **OSMP** (Doc Ref. 7.14 Rev 1) has been updated at Deadline 1 to include a commitment for additional ALC survey to be undertaken in areas of the Solar Development Area that were inaccessible during the pre-application surveys, in order to inform the preparation of the detailed Soil Management Plan.<br><br>Section 5.5 addressing Assessment Assumptions and Limitations of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) has been updated at Deadline 1 to acknowledge that 100% survey coverage of the Solar Development Areas was not possible and how data has been applied to the areas not surveyed.<br><br>It is noted that the areas at elevated risk of UXO are associated with World War II aircraft crash sites and therefore require an excavation license from the Ministry of Defence under the Protection of Military Remains Act 1986 (POMRA), prior to any intrusive works, including ALC survey, can be undertaken within these areas. A POMRA license would be applied for post-DCO consent, |

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| | are indications that a location is unsuitable due to perceived UXO risk, auger and pit locations should be adjusted to a nearby suitable location.<br><br>Unsurveyed areas should be subject to ALC survey where accessibility allows, even if this must be postconsent, to ensure the evidence is available to inform the final Soil Management Plan.<br>Rationale should be provided for any remaining un-surveyed areas across the site.<br><br>The oSMP, secured by DCO Requirement 19, must make clear commitment for the completion of the ALC dataset. | as set out within the **Outline Archaeological Mitigation and Management Strategy (OAMMS)** (Doc Ref. 8.7).<br><br>Assessment assumptions and limitations in Section 5.5 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) have been updated at Deadline 1 accordingly. |
| BMV5<br>ALC Survey Findings - Mapping | Following our comments with regard to Mapping of ALC grades at pre-application stage (APP-056, Table 5-3, 9th September 2025), the Applicant has presented both auger-by-auger point analysis and field average. NE continues to have concerns with the mapping of ALC grades across the order limits. As set out in the ALC Guidelines, 'Land is graded and mapped | NE's reference to the ALC guidelines[45] is from the methodological framework that requires point-based observations (auger and pit data) to be interpreted and generalised into mapping units defined by dominant soil and land characteristics.<br><br>The use of field average ALC mapping is undertaken at a scale that reflects the practical management and |

1. [45] DEFRA (2025) **Agricultural Land Classification of England and Wales: Guidelines for grading the quality of agricultural land (JP069). Available at: https://publications.naturalengland.org.uk/publication/6257050620264448 [Accessed 28/07/2026]**

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| | without regard to present field boundaries, except where they coincide with permanent physical features'. NE notes the presentation of both auger point and field average ALC grading; acknowledges that a worst case scenario has been used to determine the significance of effects in table 5-15. However, whilst NE agrees that there may be isolated augers of differing ALC grades which would not be reasonably practicable to be managed in an isolated way (APP-173, para 3.5.2-3.5.4), and as such, it is not helpful to map isolated auger cores of differing ALC grades, we do not agree that a field average approach should be taken when mapping ALC grade.<br><br>No attempt has been made to use or integrate existing data from the semi-detailed survey undertaken by Land Research Associates, nor is there any discussion regarding the Post 1988 ALC survey available for part of the site. It is acknowledged that the previous Post 1988 survey is referenced within the Methodology; | continuity of land quality across the field or parcel. As such, isolated or minority point observations of differing soil characteristics are assessed in the context of their spatial extent, continuity, and whether they represent a mappable and operationally distinct land resource. The presentation of field averages reflects the dominant limiting factors and the agronomic operational capacity of the land parcel. The field average data was presented at an earlier project stage and dual presentation of the data is specific to this development to maintain consistency of presentation. Notwithstanding the above, the assessment presented within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) is based on the auger-by-auger point mapping as this presents a worst-case assessment, and the field averaged results have been presented for information only.<br><br>Other datasets, including the reconnaissance survey undertaken by Land Research Associates (LRA)[46] and the Post 1988 ALC survey for Postlands Estate[47], were reviewed, however, they have not been used to |

[46] LRA (2024) Meridian Solar Farm. PEIR Volume III Appendix 9-1: Agricultural Land Classification Survey Report – PV Area. Available at: https://meridiansolarfarm.co.uk/wp-content/uploads/2025/stage-two-consultation/peir-volume-iii/0901%20-%20PEIR%20Volume%20III%20Appendix%209-1%20Agricultural%20Land%20Classification%20Survey%20Report%20PV%20Area.pdf [Accessed 28/07/2026]

[47] Resource Planning Group (1992) Agricultural Land Classification detailed Post 1988 ALC survey, Crowland, Postlands Estate (ALCC05791). Available at: https://publications.naturalengland.org.uk/publication/5590632018477056 [Accessed 28/07/2026]

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| | that this area was re-surveyed as no point by point data was available (APP-056, para 5.4.5), however, NE would expect discussion to be provided regarding the discrepancies between the results. This would be particularly useful where detailed survey was not undertaken (i.e. inaccessible areas).<br><br>NE advises that, following updates to soil wetness calculations and ALC gradings (see item BMV6) an updated ALC map should be prepared in line with the requirements of the BSSS Working with soil competencies (WWSCompleteCompetencies.pdf), which sets out the expectation for mapping soil units and ALC grades.<br>Further discussion should also be provided regarding the Semi-detailed survey undertaken by Land Research Associates and the Post 1988 ALC survey available for part of the site, particularly where detailed survey was not undertaken, or where grading differs significantly. | determine the ALC grade of the land within the Solar Development Area. Further reference to other surveys within the Order Limits has been included in **ES Appendices 5-2** and **5-3** (Doc Ref. 6.3 Rev 1) at Deadline 1. However, there will not be a combination and inclusion of the data to determine the overall ALC grade of the Site for reasons explained below.<br><br>The density of sampling within the LRA's semi-detailed survey was variable across the Solar Development Areas, with an average density of approximately one observation per 4 to 5 hectares. The results were mapped but the precise geolocation of samples was not available. This was a consideration in undertaking a complete, new survey rather than adding to the earlier sample records. The Applicant also undertook pre-application engagement with Natural England to discuss the differences in survey results, however, due to the greater survey density provided by the updated ALC survey results presented within **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1), the Applicant considers that updated survey results supersede the results of the LRA report.<br><br>The post-1988 survey referred to by NE is available through its Access to Evidence database[47] and was considered during the desk study. However, the documentation available for that survey had inadequate supporting information to enable a meaningful technical |

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| | | comparison. In particular, the published material does not include detailed soil profile descriptions, soil logs, or other field data. It is further noted that the post-1988 survey only covers a small section of Parcel B, which has since the completion of this survey been transformed by the construction of the A16 through the survey area. It does not provide any additional information for areas where access for surveys within the Order Limits was restricted. The post-1988 survey data shows a mix of Grade 2 and Grade 3a ALC land in areas that was reported as a mix of Grade 1, 3a and 3b land within **ES Appendix 5-3** (Doc Ref. 6.3 Rev 1).<br><br>The updated ALC surveys presented within **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1) were based on site-specific field observations collected during the survey and interpreted in accordance with the MAFF Agricultural Land Classification Guidelines and Field Survey Handbook[48]. (Ministry of Agriculture, Fisheries and Food (1988) Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land). The grading assigned reflects |

[48] Ministry of Agriculture, Fisheries and Food (1988) Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land. https://webarchive.nationalarchives.gov.uk/20130402151656/http:/archive.defra.gov.uk/foodfarm/landmanage/land-use/documents/alc-guidelines-1988.pdf. Accessed: 31 July 2026.

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| | | the soil and Site conditions encountered during the survey and is supported by the recorded field evidence. In the absence of equivalent supporting data from other studies, no robust technical comparison between the assessments can be undertaken. |
| BMV6<br>ALC Survey Findings – Wetness Class Calculation | Although Para 3.5.1. of both ALC reports (APP-172 & APP-173) state that 'ALC grade has been calculated on a point-by-point basis, with features of wetness class (Slowly Permeable Layer and Gleying) analysed from each auger sample'. Para 5.1.2 in both reports contradicts this by stating, 'The general profiles for the soil types identified on the Site has been used to assess the Wetness Class (WC) for the Soil.'<br>The Grade of each overarching soil type according to soil wetness has been determined in sections 5.2 and 5.3 of each ALC report.<br><br>In particular, Para 5.2.1 on ALC report for parcels A and D (APP-172) states that 'The majority of Area 1 and 2 has been identified with the combination of the topsoil texture (Heavy Silty Clay Loam), Wetness Class (III) and the number of Field Capacity Days (<126), | Testing for calcium carbonate using 10% hydrochloric acid was undertaken in accordance with the ALC guidance[49]. Where the test results were negative, these were not included in the ALC survey reports presented within **ES Appendices 5-2 and 5-3** [APP-172 to APP-173], with only positive results reported. Clarification has been provided within **(ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1)) at Deadline 1<br><br>Calcareous conditions were not uniformly present across the clay soils. Positive reactions were recorded only in limited and spatially discontinuous locations, with most observations indicating non-calcareous conditions below approximately 25 cm depth. This is consistent with the published soil information, which describes the Wallasea soils as being "calcareous in places" rather than uniformly calcareous throughout their extent. |

[49] DEFRA (2025) *Agricultural Land Classification of England and Wales. Guidelines for grading the quality of agricultural land*. Available at: https://publications.naturalengland.org.uk/publication/6257050620264448

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| | together with the topsoil being calcareous results in ALC Grade 3b for Type 1 soils.'<br>However, as per ALC guidelines Table 6, if the soils exhibit a Calcium carbonate content greater than 1%, a clay content greater than 18% in the top 25 cm, and the number of field capacity days below 150, the Soil Wetness should be relaxed by 1 grade. This distinction should be made in this case, reducing the Wetness Class to WCII. This is significant as it would improve the ALC Grade for HZCL and MZCL from 3b to 3a or from 3a to 2 in this instance.<br><br>Wetness Class Calculations should be updated across both of the ALC reports to reflect the calcareous soils, with ALC gradings subsequently amended to reflect this and remapped as per item BMV5.<br>The Assessment of Effects to BMV land at ES Chapter 5 must then be updated to reflect any changes in ALC grading. | As the calcium carbonate of most samples was not greater than 1%, the other considerations within Table 6 of the ALC guidelines[45] do not apply. |

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| BMV7<br>ALC Survey Findings – Soil Auger Records | Soil bore logs provide a detailed log of soil properties. However, it is unexpected to see the same soil properties, including soil horizon depths; and soil colours across large swathes of land as shown in Appendix II. Particularly as it has been previously acknowledged both in the ALC report (APP-172 para 3.5.2 & APP-173 para 3.5.2) "a degree of variability in physical characteristics within a discrete area is to be expected", and in a previous reconnaissance survey of the site, that the soils are variable over short distances '[fine silty] soils occur in a complex pattern throughout the site'; '[coarse silty] soils occur mainly in the east of Land Parcel C and in large areas through Land Parcel B, although they also occur in a complex pattern on higher ground within the clay soils described below'; and '[clay] soils are the most common across the survey area…. Variation occurs within these soils, where fine silty and coarse silty soils are formed along former creek channels.'<br>Furthermore, the soil pit photograph appended to the ALC report for parcels A and D (APP-172) 'soil type 2 PIT', clearly shows a high topsoil depth variability | Auger borehole logs were recorded in accordance with the Field Survey Handbook[50] using a standardised descriptive framework to ensure consistency in the recording of soil characteristics across the survey area. The occurrence of identical or near-identical horizon depths at adjacent observations is not unusual where soils have developed with horizon boundaries recorded during ALC surveys typically assigned to the nearest integer depth within a homogenous soil unit.<br><br>The ALC survey reports (**ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1)) presented generalised soil profiles for each soil type to avoid unnecessary repetition where profile characteristics were found to be consistent across the survey area. The full soil pit logs and descriptions have been provided within **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1) at Deadline 1. These demonstrate the basis upon which the soil types were identified and confirm the presence of the soil characteristics described within the assessment. |

[50] Ministry of Agriculture, Fisheries and Food (1988) *Agricultural Land Classification of England and Wales: revised guidelines and criteria for grading the quality of agricultural land*. Available at: https://publications.naturalengland.org.uk/publication/6257050620264448

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| | across a relatively small area, suggesting topsoil depths across the wider sites would also be more variable than suggested by the auger bore log. The photographs, whilst welcome, lack the information required to make them useful. There are no coordinates or direction shown for the photos, nor soil bore numbers.<br>Whilst only two soil types were identified across the 2 sites, it would be expected that due to the size of these sites, and the fact they are spatially isolated from each other, more than 2 pits would be explored to confirm soil structural properties.<br><br>NE does not request any further action on this point, however, would like to note this for PINS' consideration as a further concern regarding the robustness of the ALC survey. | |
| BMV8<br>ALC Survey Findings – Soil Lab Analysis | NE welcomes the lab analysis undertaken. Although, it is noted that the depth and texture measurements listed in the soil bore log do not align with the depths and textures provided in the lab analysis, which raises some concern. | Testing for calcium carbonate using 10% hydrochloric acid was undertaken in accordance with the ALC guidance[51]. Where the results were negative, these were not included in the ALC survey reports presented within |

[51] DEFRA (2025) *Agricultural Land Classification of England and Wales. Guidelines for grading the quality of agricultural land*. Available at: https://publications.naturalengland.org.uk/publication/6257050620264448

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| | The percent calcareousness has also not been determined. Therefore, it cannot be confirmed which soils should be considered calcareous. This is a significant omission, as this will impact the Wetness Class, and therefore the ALC Grade.<br>The soils have been tested according to the British Standard for topsoil, which is designed for imported soils. This is not the appropriate soil test in this instance. NE would generally only expect particle size distribution (Texture) and calcareous content to be tested.<br><br>As per item BMV6, NE requests that the wetness class is recalculated considering the calcareous soils. Based on the available literature and contextual information, NE considers it necessary to take a worst case scenario approach in the absence of complete lab testing to assume all relevant soils have a CaCO3 content of more than 1%.<br>This assumption would need to be noted in the SMP, as restoration to the same grade, should the soils not be calcareous, would not be possible. | **ES Appendices 5-2 and 5-3** [APP-172 to APP-173], with only positive results reported.<br><br>Calcareous conditions were not uniformly present across the clay soils. Positive reactions were recorded only in limited and spatially discontinuous locations, with most observations indicating non-calcareous conditions below approximately 25 cm depth. This is consistent with the published soil information, as described within Section 5.6 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1), which describes the Wallasea soils as being "calcareous in places" rather than uniformly calcareous throughout their extent. The field survey results were incorporated into the interpretation of soil wetness and land quality.<br><br>Sampling for lab analysis was undertaken after the initial field survey and following harvest and cultivation. Locations were matched as accurately as possible but small-scale spatial variation is likely. The act of cultivation led to minor changes to topsoil depths through loosening. Where lab tests have indicated textural differences from hand texturing of soils in the field the auger logs in **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3 Rev 1) have been updated. The change from heavy silty clay loam to silty clay does not, however, lead to changes in wetness classes III and IV. |

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| | | It is noted that BS3882[52] relates to traded topsoil. However, the suite of tests provides both the information required by NE and data relating to plant nutrients that can be considered within **OLEMP** (Doc Ref. 7.16 Rev 1) for specification of seed mixes. |
| BMV9 Assessment Methodology | NE generally welcomes the ES assessment methodology, which follows ISEP (formerly IEMA) guidance ('A New Perspective on Land and Soil in Environmental Impact Assessment').<br><br>The sensitivity and magnitude criteria attributed to BMV land in Tables 5-5 and 5-6 are all suitable. | NE recognition of the suitability of assessment methodology presented within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) is noted. |
| BMV10 Assessment of impacts to BMV land within the ES: ALC Results | As set out in Table 5-9, 375.4ha of the total 1067.4ha Solar Development Area is classified as BMV, based on grades averaged by soil type. Table 5-10 indicates a greater proportion of BMV, at 418.6ha, when mapped by individual auger point. See item BMV5 for NE's comments with regard to the ALC mapping.<br><br>Table 5-11 sets out the provisional ALC grades of each of the inter-array connections and grid connection route. 100% of these areas are BMV, a total of | The Applicant notes that the assessment presented within Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) is based on auger-by-auger point survey results, to present a worst-case assessment.<br><br>The predictive ALC model was released after completion of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev1). The model is secondary to field survey data. The use of provisional ALC data for the Grid Connection Route and the Inter-Array Corridors delivers a worst-case |

[52] BSI (2015) *BS 3882:2015 - Specification for topsoil*

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| | 542.1ha.<br><br>NE would like to reference the recently published Predictive ALC map for England, which has now replaced the Provisional ALC mapping as the primary strategic dataset. The mapping is available via the Defra Data Services Platform and has now also been incorporated into MAGIC. This updated mapping is unlikely to alter the outcome of the assessment to show any additional effects, as 100% of the inter-array areas and grid connection corridor have already been considered either grade 1 or 2 land.<br><br>It must be acknowledged that the applicants' assessment of effects to Best and Most Versatile Land is based upon ALC survey results that NE has significant concerns around (see items BMV5 to BMV8). As such, the following advice at items BMV11 to BMV15 may need to be superseded following any amendment to the survey results.<br><br>See item BMV6. The Assessment at ES Chapter 5 should be updated following amendments to ALC grading. | outcome. Incorporation of the predictive ALC model is not proposed at this stage of the assessment.<br><br>Responses to comments raised in BMV5 to BMV8 is provided in rows above. The Applicant does not propose to update the ALC survey mapping, as the results accurately present what was recorded during the field survey. |
| BMV11<br>Permanent Loss of | Paragraph 5.8.2 (APP-056) sets out that On-Site Substation and BESS Compounds, Solar Stations and | Paragraph 5.8.2 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev1) identifies that the assessment of |

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| BMV Land for Hardstanding | CSEC Compounds will involve the creation of hardstanding, which will be in situ for the lifetime of the development, and removed at decommissioning. Despite the removal at decommissioning, the Applicant has considered, for the purpose of the ES, that the land will be permanently lost where these are sited on Grade 1 and 2 BMV land.<br><br>Whilst the rationale for this being due to the very high sensitivity of Grade 1 and 2 land is noted, NE considers it may not be possible to re-establish the standard of BMV land for lower grades; particularly Grade 3a, which is still classified as BMV. NE references the recent precedent from the Springwell Solar project, where the SoS stated in their decision letter (Para 4.49):<br>'In respect of BMV land, the Secretary of State notes that the ExA disagreed with the Applicant's assessment of BMV land and instead agreed with NKDC that sealed over hard standing areas of the Proposed Development should be treated on a precautionary basis as 'permanently lost' [ER 8.4.16]. The Secretary of State notes that this approach has been followed on other similar solar farm developments to provide a worst-case scenario where such areas cannot be returned to the same Agricultural Land Classification ("ALC") grade and considers it | effects for areas of hardstanding has been assessed as a permanent change. This approach pre-dates the decision of the SoS from the Springwell Solar Farm but adopts the same approach.<br><br>Whilst assessment of effects is based on permanency this is not the approach being adopted at decommissioning. Upon decommissioning areas of hardstanding will be removed and land restored. NE has expressed reservation about restoration to grades 1 or 2 land. It is considered that restoration to subgrade 3a (also BMV land) could be achieved through good practice delivered through the Soil Management Plan and the return of soil function.<br><br>NE's reservation that restoration to subgrade 3a will be challenging and so the worst-case scenario for impact assessment has been adopted, whereby subgrade 3a land has been bracketed with grades 1 and 2 for assessment of effects. Further explanation of the approach has been incorporated into **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev1) at Deadline 1. |

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| | appropriate to use this approach in this case too.'<br><br>On-Site Substation and BESS Compounds, Solar Stations and CSEC Compounds requiring hardstanding for the lifetime of the development are sited on BMV land, including Grade 3a, should be considered permanently lost as part of the 'worst case scenario' in the ES. | |
| BMV12<br>Downgrading of effect magnitude | Paragraph 5.8.3 (APP-056) discusses the downgrading of the magnitude of effect (from medium to low) of permanent tree and shrub planting as a result of these features being sited along field boundaries.<br><br>It should be noted that impacts of these elements of habitat creation would be major adverse (loss of 8.3ha Grade 1 and 2 BMV) and moderate adverse (loss of 10.8ha Grade 3a BMV) if the standard medium magnitude of effect was applied; so this split from the ISEP guideline is significant.<br><br>It is noted that the ISEP Guidance states: 'in all cases these tables should not replace professional judgement by experienced professionals based on the specifics and context of the EIA being undertaken', however, NE considers this amendment should be omitted. Whilst this impact on the BMV resource | The scale of land use for tree and shrub planting is clearly presented. Paragraph 5.8.3 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev1) addresses the reason for applying professional judgement to the magnitude of effects of tree and shrub planting. NE notes the flexibility offered within the ISEP guidelines to apply professional judgement.<br><br>The variance in professional opinion is noted. NE commentary and advice refer to the proposed planting as enhancements. Systems integrating trees with agricultural cropping demonstrate that under extreme weather conditions (droughts or winds) trees improve production on the adjacent crop. The data regarding the scale of planting within ALC grades are clearly presented and the rationale for the judgement is included. Application of professional judgement and the reason for modifying the assessment contained in Table 5-7 within **ES Chapter 5:** |

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| | differs to that of soil stripping and hardstanding, and siting of these features on field boundaries will reduce the project's lasting effect on the agricultural use of the site, which is a relevant consideration in the decision making process, these enhancements will nonetheless result in a permanent loss of BMV land, which should not be understated within the ES.<br><br>It is also noted that Table 5-15 shows that the permanent loss of 8.3ha of Grade 1 & 2 land for Trees and Shrubs as a minor, insignificant effect (after considering the downgraded magnitude of effect). However, in line with Table 5-7, this minor effect on a very high sensitivity receptor should result in a moderate, significant adverse effect.<br><br>The downgrading of magnitude of impact of tree and shrub planting along field boundaries should be omitted.<br><br>Should this amendment not be made, the significance of the effect of permanent loss of Grade 1 & 2 BMV land for trees and shrubs should as a minimum be amended to moderate, significant. | **Agriculture and Soils** has been further developed for Deadline 1 (Doc Ref. 6.1 Rev1). |

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| BMV13<br>Overall Permanent Loss of BMV Land | Table 5-15 and 5-16 set out the significance of effects to agriculture and soils from each element of the development.<br><br>NE considers that all permanent losses of Grade 1 & 2 land (as a very high sensitivity receptor) should be assessed together. The same applies for Grade 3a land (as a high sensitivity receptor). Whilst the permanent losses presented are from different elements of the project (and it's still helpful to present this, which is welcomed) without then considering the total permanent losses from all elements of the development, this is an omission in terms of cumulative assessment of intra-project effects.<br><br>It is pertinent to understand the total permanent loss of BMV land as a result of the proposal.<br><br>The ES should present the total permanent losses of Grade 1 & 2 land, and Grade 3a land when determining the overall significant of effects. | The nature of 'permanent' loss of BMV land within the assessment varies with how land will be developed and then also how it will be restored following decommissioning and it is important to present effects in a nuanced way.<br><br>Areas of hardstanding have been assessed as if permanent even though these are to be removed and the land restored on decommissioning. Areas of tree and shrub planting are permanent and adopt BMV land but soil function is maintained or enhanced and differentiating from built infrastructure is relevant to the assessment.<br><br>.An additional table and associated commentary reflecting the total permanent loss of BMV land has been included within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) at Deadline 1. |
| BMV14<br>Other Matters | Aside from the advice provided above, NE considers the assessment at Chapter 5 to be suitable.<br><br>The Soil Management Plan (SMP) remains essential mitigation to ensure effects are temporary as | NE's recognition of the suitability of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev1) is noted.<br><br>The importance of the **OSMP** (Doc Ref. 7.14 Rev 1) is acknowledged. |

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| | described. See NE's comment on oSMP at item BMV15. | |
| BMV15<br>Soil Management | NE welcomes the commitment to produce a SMP postconsent. Our advice regarding the oSMP is set out below.<br><br>The following items must be updated in the oSMP (APP-280) pre-consent:<br>- It is welcomed that ALC survey of the Cable route areas is secured in the SMP (paragraph 3.1.2.). However, ALC survey of other unsurveyed areas (including inaccessible areas and areas of high UXO risk) must be carried out post-consent; the oSMP should be updated to reflect this.<br>- Despite being discussed within the ES Chapter 5, no firm commitment is made within the SMP to restore agricultural land to the same ALC grade. This applies to both temporary impacts during construction (i.e. access tracks and construction compounds) and operational impacts (i.e. Substations). The oSMP should be updated to ensure this commitment is secured.<br>- Paragraph 5.7.2 says 'An aftercare period will not be necessary for the majority area where soil has remained in situ as the extended period of time under grass should leave the soil profile in better structural | The **OSMP** (Doc Ref. 7.14 Rev 1) has been updated for Deadline 1 to reflect the requested information, as described below:<br><br>• Unsurveyed areas will be subject to field survey. A requirement has been included within Section 3.1 of the **OSMP** (Doc Ref. 7.14 Rev 1).<br><br>• Restoration to the original ALC grade will be made for the majority of the development. However, restoration of areas of hardstanding to grades 1 or 2 may be untenable. NE has expressed reservation that restoration to subgrade 3a will be achieved but that will be the target. Paragraph 4.1.3 last bullet states that the detailed SMP will include a target specification for the restored soils which will be established according to location and soil types, end use and the existing baseline ALC grade. In addition, paragraph 5.7.2 of the **OSMP** (Doc Ref. 7.14 Rev 1) states that '*Decommissioning will aim to restore all agricultural land without any degradation of the current ALC Grade, as informed by the detailed ALC survey.*' As such, the commitment is considered to be sufficiently secured within the **OSMP** (Doc Ref. 7.14 Rev 1). |

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| | condition than that found under the current arable production'. Aftercare will be necessary where soils have been stripped, stored, moved and reinstated. The oSMP should be updated to ensure ths is included.<br><br>The following items should be included in the oSMP pre-consent, but must be included in the final SMP post-consent:<br>- No Soil Budget has been provided in the oSMP.<br>- No reference is made to the need for soil bunds to be in place for more than six months to be grassed and regularly cut to avoid excessive weed growth.<br><br>Requirement 19 should be updated to include consultation with NE on the final SMP.<br>See items NE considers must be updated in the 'NE Commentary and Advice' column adjacent.<br><br>The SMP is secured by DCO requirement 19; must be substantially in accordance with the oSMP. | • Aftercare measures for soils that have been stripped, stored, moved and reinstated will be ensured by making provision, to the owner or manager of the land, for specialist technical advice from soil scientists, agronomists or agricultural engineers, as necessary. This commitment is established at Deadline 1 for the **OSMP** (Doc Ref. 7.14 Rev 1).<br>• Soil budgets will not be established until the detailed Soil Management Plan.-<br>• Paragraph 4.1.9 of the **OSMP** (Doc Ref. 7.14 Rev 1) has been updated to state that soil bunds stored for six months or longer will be seeded and managed to prevent woody vegetation from establishing.<br><br>The Applicant notes Natural England's comments. In response, the Applicant has amended Requirement 19 of the **Draft DCO** (Doc Ref. 3.1 Rev 2) submitted at Deadline 1 to include Natural England as a consultee in relation to the approval of the Soil Management Plan. The Applicant considers that Requirement 19 provides an appropriate mechanism for securing the preparation and implementation of a Soil Management Plan substantially in accordance with the **OSMP** (Doc Ref. 7.14 Rev 1). |
| **Biodiversity Net Gain** | | |

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| NE26<br>Biodiversity Net Gain | NE has not reviewed the BNG metric in detail, but notes that the Biodiversity Net Gain report [APP-274] sets out that based on the current development plans for the site, biodiversity gains of +14.60% for areabased habitats, +477.94% for hedgerows, and +11.42% for watercourses are achievable on site, whilst satisfying all trading rules.<br><br>Draft DCO [APP-028] Requirement 8 includes commitment to the delivery of a minimum of 10%, 400% and 10% net gains for Habitat, hedgerow and watercourses, respectively, which is welcomed. | The Applicant notes Natural England's comments and welcomes its support for Requirement 8 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). |
| **Other Comments** | | |
| NE27<br>Ancient Woodland | ES Chapter 7 [APP-060] paragraph 9.6.9 states that no Ancient Woodland is mapped within 2km of the site; no Ancient Woodland was identified during site surveys. As such, no impacts to this irreplaceable habitat are expected.<br><br>Individual ancient/veteran trees have been identified on site (APP-242 Table 5-3), however, development design has avoided any direct effects, and indirect effects during construction are to be managed via the Arboricultural Method Statement, secured via the oCEMP. | Noted, no further response required. |

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| | Draft DCO [APP-028] Requirement 12 secures the provision of the Construction Environment Management Plan, substantially in accordance with the outline CEMP [APP-275]. It is clearly noted in the oCEMP that an 'Arboricultural Method Statement and Tree Protection Plan' will be drafted as part of the CEMP (oCEMP paragraph 4.1.2). | |

## 3.12. Network Rail Infrastructure Limited

3.12.1. Table 3-12 below sets out the Applicant's response to the issues raised within the Relevant Representation from Network Rail Infrastructure Limited [RR-142] including signposting to the relevant sections of the DCO Application.

**Table 3-12: Network Rail Infrastructure Limited**

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| General / Compulsory Acquisition | Network Rail is a statutory undertaker for the purposes of the Planning Act 2008. Network Rail is identified in the application documents as the holder of interests and private rights affected by the Order, including as a Category 2 person in the Book of Reference and as a person whose easements or other private rights may be extinguished, suspended or interfered with.<br><br>The Promoter seeks authority and powers in the draft Order including powers of compulsory acquisition of land, compulsory acquisition of rights, permanent access, extinguishment or suspension of private rights, override of easements and other rights, temporary possession and powers affecting statutory undertakers' interests over land in which Network Rail has interests and/or private rights as summarised below:<br><br>Compulsory acquisition of land in respect of 20225 square metres of hedgerow and drain (lying to the | The Applicant notes Network Rail's representation and its interest in the affected land. The Applicant undertook engagement with Network Rail in 2025 to seek clarity as to the nature of its historic rights within the noted plots and their connection to Network Rail's undertaking. At that time Network Rail did not provide clarity as to the nature of those interests nor confirm whether it still sought protective provisions.<br><br>Following receipt of this relevant representation, the Applicant is now engaging with Network Rail regarding the nature and extent of its interests and the protective provisions sought. The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), which identifies the current status of engagement with Network Rail, including discussions relating to protective provisions and the protection of Network Rail's operational and property interests. Discussions are ongoing and the Applicant will continue to seek to agree an appropriate form of protective provisions with Network Rail. The **Draft DCO** (Doc Ref. |

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| | south of Queen's Bank) in which Network Rail is identified as having an interest/right (Plot A3-28);<br><br>Compulsory acquisition of rights in respect of overhead lines and associated infrastructure of the 2220 square metres of abandoned railway line, grassland, and drain (lying to the east of A16 Cowbit Road), in relation to which Network Rail has rights reserved by way of conveyance dated 23 October 1991 (Plot B1-24);<br><br>Compulsory acquisition of rights in respect of permanent access for construction, operation and decommissioning of 122 square metres of abandoned railway line, access track and grassland (lying to the east of A16 Cowbit Road), in relation to which Network Rail has rights reserved by way of conveyance dated 23 October 1991 (Plot B1-26);<br><br>Compulsory acquisition of rights in respect of permanent access for construction, operation and decommissioning of 270 square metres of abandoned railway line and grassland (lying to the east of A16 Cowbit Road), in relation to which Network Rail has rights reserved by way of conveyance dated 23 October 1991 (Plot B1-39)<br><br>Compulsory acquisition of rights in respect of permanent access for construction, operation and decommissioning of 38 square metres of grassland | 3.1 Rev 2) will be updated as necessary to reflect any agreed position. |

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| | (lying to the east of A16 Cowbit Road), in relation to which Network Rail has rights reserved by way of conveyance dated 15 February 1989 (Plot B1-42) | |
| | Network Rail is continuing to review the application documents, and reserves the right to identify further plots, rights, interests, easements, access rights or other railway property affected directly or indirectly by the Order, including through the exercise of powers under articles 25, 27, 31, 32 and 33 of the draft Order.<br><br>Network Rail wishes to ensure that the Scheme will not have a detrimental impact on the safe and efficient operation of the Railway, that access to railway property is not obstructed or prejudiced, that the safety of the Railway is maintained during the construction, operation, maintenance and decommissioning of the Scheme, and that no existing or future railway use of railway property is prejudiced. | The Applicant remains committed to engaging with Network Rail in relation to its land interests, rights, apparatus and operational requirements. The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2).<br><br>The Applicant acknowledges the importance of ensuring that the construction, operation, maintenance and decommissioning of the Scheme do not adversely affect the safe and efficient operation of the railway, prejudice access to railway property, or interfere with existing or reasonably foreseeable railway activities. These matters are being addressed through ongoing discussions with Network Rail.<br><br>The Applicant will continue to engage constructively with Network Rail throughout the Examination. |
| | Network Rail objects to the making of the Order insofar as it would authorise the compulsory acquisition of land or rights, permanent access, the extinguishment, suspension or interference with private rights, the override of easements and other rights, temporary possession, or any other | The Applicant is engaging with Network Rail regarding its land interests, rights, apparatus and operational requirements. The latest position on those discussions is recorded in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2).<br><br>The Applicant does not agree that the statutory tests for the acquisition of statutory undertakers' land or interests cannot be met. The Applicant still seeks clarity from |

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| | interference with Network Rail's interests, easements, access rights and railway property.<br><br>On the information currently available, Network Rail is not satisfied that the statutory tests applicable to the acquisition of statutory undertakers' land and interests are met, nor that the exercise of the powers sought would avoid serious detriment to the carrying on of Network Rail's statutory undertaking. | Network Rail in respect of the nature of these historic interests and their connection to its current undertaking. Discussions remain ongoing and the Applicant will continue to work constructively with Network Rail throughout the Examination with a view to agreeing an appropriate package of protections for Network Rail's operational and property interests. |
| | In particular, the powers sought are liable to: (a) interfere with the safe and efficient operation of the Railway; (b) prejudice access to railway property for inspection, maintenance, repair, renewal and emergency purposes; (c) prejudice Network Rail's retained property interests and private rights over disused railway land and corridors; (d) extinguish, suspend, interfere with or override rights benefiting Network Rail; and (e) cause serious detriment to the carrying on of Network Rail's undertaking.<br><br>The draft Order contains wide powers under article 21 (compulsory acquisition of land), article 24 (compulsory acquisition of rights), article 25 (private rights), article 27 (power to override easements and other rights), articles 31 and 32 (temporary use of land) and article 33 (statutory undertakers). However, the current draft Order does not include any protective provisions for the protection of railway interests in Schedule 13. That omission is | The Applicant notes Network Rail's concerns regarding the potential effects of the powers sought in the draft DCO on its land interests, rights and operational activities. The Applicant is actively engaging with Network Rail regarding the scope of its interests and the protections required. The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2).<br><br>The Applicant does not agree that the omission of bespoke railway protective provisions from the application version of the draft DCO is inappropriate. The Applicant has still not been provided clarity from Network Rail as to the nature of its remaining interests over the area of disused / historic railway land within these plots. Discussions with Network Rail remain ongoing and no agreed form of bespoke Protective Provisions had been reached at the time of submission. The Applicant will continue to engage constructively with Network Rail throughout the Examination with a |

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| | not acceptable given the powers sought over land and rights affecting Network Rail. | view to agreeing an appropriate package of protections for Network Rail's interests, operational requirements and statutory undertaking. Any agreed position will be reflected in the draft DCO as appropriate. |
| | For the avoidance of doubt, Network Rail's objection is not limited to current operational railway lines. Land identified in the Scheme documents as disused or abandoned railway land may nevertheless form part of railway property or retained corridors with operational, strategic, access, drainage, safeguarding or future transport value. Interference with such land or rights may therefore still cause serious detriment to Network Rail's undertaking. | The Applicant is engaging with Network Rail regarding its land interests, rights and operational requirements. The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2).<br><br>The Applicant will continue to engage constructively with Network Rail throughout the Examination. |
| | In order for Network Rail to be in a position to reconsider or withdraw its objection, Network Rail requires:<br><br>(a) protective provisions for the protection of railway interests to be included within the Order in the form set out at Appendix 1 to this Relevant Representation, or in such other form as Network Rail may approve in writing; and<br><br>(b) an asset protection agreement and any ancillary property agreement(s) required to regulate the exercise of rights, design interface, construction | The Applicant notes Network Rail's position. The Applicant is engaging with Network Rail regarding the nature of its interests and if necessary, the scope and wording of bespoke Protective Provisions and any associated asset protection and property agreements that may be required in connection with the Scheme. The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2).<br><br>Discussions regarding Protective Provisions and any associated agreements remain ongoing, and the Applicant will continue to engage constructively with |

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| | activities, access, maintenance responsibilities, cost recovery and operational protection so as to prevent adverse impacts to the Railway.<br><br>The protective provisions sought by Network Rail are minimum protections and include, among other things, provisions preventing the exercise of compulsory acquisition powers, rights acquisition powers, temporary possession powers, private rights override powers and statutory undertaker powers over railway property without Network Rail's consent; preventing interference with railway access and rights; requiring approval of plans and protective works; requiring an asset protection agreement before specified works are undertaken; and securing indemnity and reimbursement protections in favour of Network Rail. | Network Rail throughout the Examination with a view to reaching agreement.<br><br>The Applicant does not agree that the Order should be withheld pending the agreement of Protective Provisions or contractual arrangements. Network Rail has not yet provided clarity on the nature of these historic interests and what relevance they have to its statutory undertaking today. The Applicant considers that these matters are appropriately being progressed through ongoing engagement between the parties and will continue to work with Network Rail to seek agreement on an appropriate package of protections. Any agreed position will be reflected in the draft DCO as appropriate. |
| | Network Rail is continuing to review the Promoter's plans, draft Order and application documents, and will continue to engage constructively with the Promoter. However, the Examining Authority should not recommend, and the Secretary of State should not make, the Order in its present form insofar as it would authorise interference with Network Rail's interests unless and until:<br><br>(a) the statutory tests applicable to statutory undertakers' land and rights are shown to be met; and (b) adequate protective provisions and | |

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| | contractual protections for railway interests have been secured<br><br>Network Rail requests that it be treated as an Interested Party for the purposes of the Examination. Network Rail reserves the right to submit further and more detailed written representations, including plot-specific submissions and comments on the draft Order, Book of Reference and protective provisions, once further information regarding the Scheme and its effects on railway property is available. | |

## 3.13. South Holland Internal Drainage Board (submitted by the Water Management Alliance)

3.13.1. Table 3-13 below sets out the Applicant's response to the issues raised within the Relevant Representation from the South Holland Internal Drainage Board (submitted by the Water Management Alliance) [RR-211] including signposting to the relevant sections of the DCO Application.

**Table 3-13: South Holland Internal Drainage Board / Water Management Alliance**

| Topic | Matter Raised | Applicant's Response |
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| Introduction | Meridian's proposals would significantly affect SHIDB because of the large number (>100) of locations within the SHIDD where proposed works will cross watercourses, by underground or overhead cables or by access roads. Each crossing of a watercourse, unless carefully designed, constructed, maintained and re-instated, could impact drainage efficiency and subsequently increase flood risk to property, existing infrastructure and farmland. | Consultation has taken place with the SHIDB during the pre-application stage and will be continued during the examination stage. A watercourse crossing schedule has been developed, as presented within **ES Appendix 2-1: Watercourse Crossings Schedule** (Doc Ref. 6.3 Rev 1), and shared with SHIDB.<br><br>The **Draft DCO** (Doc Ref 3.1 Rev 2) already contains protective provisions for the protection of drainage authorities and the Applicant is currently engaging with SHIDB regarding bespoke protective provisions for SHIDB specifically. The protective provisions already included within the draft DCO, and those being negotiated with SHIDB, secure a process whereby detailed designs for relevant watercourse crossings and other specified works affecting drainage assets must be submitted to and approved by the drainage authority before those works are carried out. This approach is commonly secured through DCO protective provisions and ensures that detailed |

| Topic | Matter Raised | Applicant's Response |
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| | | drainage considerations can be considered and agreed in consultation with the relevant drainage authority.<br><br>Mitigation has been included on the design of culverts and on channel reinstatement in the **Design Parameters** (Doc Ref. 7.4 Rev 2) and **OCEMP** (Doc Ref. 7.10 Rev 2), as summarised within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). |
| Watercourse Crossing Schedule | The Watercourse Crossing Schedule [APP-169] lists "culvert" or "bridge" crossings but does not include the type of culvert proposed at each location.<br><br>The Environmental Statement Hydrology chapter 11 [APP-062] notes "temporary structures… are likely to be of a piped culvert design laid on a gravel and a suitable geotextile across the bed and banks."<br><br>SHIDB notes that "temporary" is likely to mean the construction period of at least three years.<br><br>SHIDB highlights that each new culvert is a potential obstruction to drainage, and would welcome discussion with the Applicant regarding use of existing culverts instead.<br><br>SHIDB welcomes the Applicant's statement that "where culverts are necessary, the least impacting design that is reasonably practicable is proposed". However, SHIDB currently does not have clarity on where piped or box | **ES Appendix 2-1: Watercourse Crossings Schedule** (Doc Ref. 6.3 Rev 1) lists out where temporary and permanent watercourse crossings may be required based on the illustrative design. The final design and type of crossing structure at each location will be determined through detailed design and, where affecting SHIDB watercourses, will be subject to approval by the IDB in accordance with the protective provisions for the benefit of drainage authorities included in the **Draft DCO** (Doc Ref 3.1 Rev 2). This approach is consistent with the DCO process, whereby detailed designs for specified works affecting drainage assets are typically developed post-consent and approved by the relevant drainage authority before construction commences.<br><br>In addition to the protective provisions, design principles for permanent and temporary watercourse crossings are secured through the **Design Parameters** |

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| | culverts are proposed. SHIDB therefore does not have confidence that Meridian's proposed watercourse crossing structures will maintain the crucial function of watercourses to enable sufficient flow for the effective removal of water, ultimately to reduce flood risk. SHIDB considers that Development Consent should not be granted whilst this information is lacking. | (Doc Ref. 7.4 Rev 2) and the **OCEMP** (Doc Ref. 7.10 Rev 2) respectively. Both of these documents commit the Applicant to following the below design principles in the development of detailed design:<br>• Where new watercourse crossings in the form of culverts or upgrades to existing culverts are required, 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>• The crossings will be sized at detailed design in order to not impact on flow conveyance and be sized to ensure capacity for the peak flow rate.<br>• Also to be considered at detailed design stage is that the crossing is perpendicular to the flow, and ensure connectivity is maintained for aquatic species and riparian mammals, with a mammal ledge if there is sufficient room. Perched inverts that create a drop from the structure to the downstream bed level will be avoided.<br>Temporary culverts are assumed to be in place for up to four years for a worst-case assessment in the ES (i.e. the duration of the construction period) and are expected to likely be of a pipe culvert design laid on gravel and a suitable geotextile across the bed and |

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| | | banks, as stated in paragraph 11.7.18 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). The watercourses will be reinstated as informed by a Pre-works Hydromorphological and Riparian Corridor Survey, as set out in the **OCEMP** (Doc Ref. 7.10 Rev 2). Where permanent watercourse crossings are referred to, these have been assumed to remain in place up until the decommissioning phase of the Scheme.<br><br>**ES Appendix 2-1: Watercourse Crossings Schedule** (Doc Ref. 6.3 Rev 1)also lists out where new watercourse crossings are proposed and where existing watercourse crossings are proposed to be utilised. Existing watercourse crossings have been used wherever practicable, although this is not possible in all locations given the extent of the drainage network within the Order Limits. |
| Access to watercourses | Meridian's construction, operational and decommissioning works could directly impact SHIDB's drainage maintenance functions if they restrict SHIDB's access to arterial watercourses. These arterial watercourses are maintained by IDB on a recurrence deemed necessary to meet water level management requirements. Access is also crucial to enable any emergency works required to ensure the functioning of drainage infrastructure. SHIDB currently does not have sufficient information on the location, nature and | Any works which affect the SHIDB drainage assets will be undertaken in accordance with the protective provisions for the benefit of drainage authorities already included in the **Draft DCO** (Doc Ref 3.1 Rev 2), or any alternative bespoke protective provisions which may be agreed with SHIDB. Pursuant to those provisions, detailed designs and plans for specified works affecting SHIDB assets must be submitted to |

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| | duration of proposed works in the vicinity of SHIDB's access areas for arterial watercourses. It appears from project plans that some works could encroach within the Board's 9m access strips. SHIDB seeks commitment from the Applicant for regular, meaningful dialogue to identify and resolve potential access issues, so that SHIDB can carry out its functions. | and approved by SHIDB before the relevant works can commence.<br><br>**ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1), Table 11-10 lists out eight locations where temporary works for pylons would encroach within a 10m buffer of SHIDB watercourses (and therefore also the 9m buffer stated within the IDB's byelaws), in addition to any works associated with watercourse crossings. However, any encroachment would only be required for temporary works, and would be agreed with the IDB following detail design in accordance with the protective provisions.<br><br>It is common practice on DCO projects for the undertaker to submit plans of specified work to the drainage authority under the protective provisions, and these would be approved in writing by the drainage authority prior to works taking place. Therefore, all future works to SHIDB assets would need to be approved by the SHIDB before they can be undertaken.<br><br>Nevertheless, the Applicant is committed to ongoing engagement with SHIDB during detailed design and construction to identify and address any potential access constraints and to ensure SHIDB can continue to fulfil its maintenance and operational functions. |

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| Height of overhead lines above watercourses | If installed too low, overhead electricity lines pose a serious electrical safety hazard to Board operators using machinery during capital and/or maintenance operations on watercourse banks. SHIDB uses unusually large, long-reach plant of up to 18m reach on larger watercourses to carry out maintenance (including de-silting and vegetation management). The Applicant proposes following or exceeding national standards on this subject, and has detailed a minimum watercourse bank clearance of just 10m for 400kV line (at Grid Connection Route overhead line span 4SV35-4SV-36), and a more typical clearance of 12-17m at other spans (detailed in a technical note provided to SHIDB by the Applicant). Inter-Array Connections (overhead 132kV lines) will have lower clearances, based on the use of shorter wooden poles rather than pylons. None of these clearances would provide any exclusion zone for the long-reach machinery. SHIDB requires a minimum of 7m clearance in addition to the machinery height. SHIDB therefore remains concerned about the Project's impact on its ability to safely conduct its functions at the numerous locations where arterial watercourses will be crossed by Meridian's overhead electrical lines. Further discussion is required on this matter. | Various existing transmission and distributions assets across the country ranging from LV and 11kV through to 400kV oversail IDB watercourses that do not achieve the clearances of 25m (maximum machinery height of 18m + 7m clearance from HSE GS6). This is particularly the case for DNO assets that are often 9-10m in height above the ground and run in parallel and cross watercourses.<br><br>The Applicant understands that SHIDB has adopted HSE GS6 when calculating clearance values. HSE GS6 provides recommendations to avoid danger from overhead powerlines and has a clearance value of 7.0m, however, this is not a legal requirement. The law requires that work is carried out in close proximity to overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled.<br><br>Where work is required near or underneath overhead lines, ENA TS 43-8 specifies an absolute minimum safety distance of 3.1m, which must be obtained to avoid danger. This value is the clearance to objects and must be maintained such that under no circumstances will the safety distance be infringed. It is the responsibility of the SHIDB and its contractors to |

| Topic | Matter Raised | Applicant's Response |
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| | | carefully assess the risks and precautionary measures and to apply safe work practices before conducting works near overhead lines.<br><br>The applicant will continue to work with the IDB during the detailed design phase regarding this matter, working together to further understand where larger machinery may be required. For reference, the technical specifications and clearance criteria for the design it adopted from the following hierarchy of standards.<br><br>- TGN(E) 275<br><br>- PS(T) 103: EMF Policy Applied to Overhead Line Design (National Grid, 2013)<br><br>- NG TS 2.04: Generic Design Principles for Overhead Lines (National Grid, 2021)<br><br>- ENA TS 43-8: Overhead Line Clearances (Energy Network Association, 2019)<br><br>- BS EN 50341-2-9: UK NNA, Overhead Electrical Lines Exceeding AC 1kV (BSI 208). |
| Minimum cable burial depth | SHIDB is likely to need to widen and/or deepen watercourses during the lifetime of the Project. This does not appear to have been acknowledged by the Project, which proposes a minimal cable burial depth of 3m below South Holland Main Drain (a key arterial | The minimal cable burial depth under the South Holland Main Drain has been updated from 3m to 5m. This is secured through the updated **Design Parameters** (Doc Ref. 7.4 Rev 2) and the **OCEMP** (Doc Ref. 7.10 Rev 2) |

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| | watercourse). SHIDB requires a minimum cable burial depth of 5m below key arterial watercourses. | |
| Land interest | At this stage, agreement between SHIDB and the Applicant has not been reached regarding areas where proposed works affect Board-owned land. SHIDB owns many arterial watercourses within the IDD. SHIDB has identified 20 watercourse crossing locations where the Meridian project will directly affect Board-owned land. Clarification is still required regarding the nature and extent of other project works affecting Board-owned land. The Applicant is seeking agreement with SHIDB in relation to over 150 land parcels. SHIDB has requested further engagement with the Applicant regarding proposed works on Board-owned land, in order to understand temporary and permanent impacts at these locations. Whilst this lack of clarity exists, SHIDB is unable to progress Heads of Terms requested by the Applicant for the affected land parcels. | The Applicant remains engaged with SHIDB in relation to their land interest, the works required on their land and the Scheme. The Applicant remains committed to reaching a voluntary agreement with SHIDB in respect of land within their ownership or that they have an interest in. A meeting took place on 30 July 2026 with SHIDB and the Applicant to discuss the matters raised by SHIDB and these discussions remain ongoing. |
| Disapplication of Land Drainage Act and byelaws | Should SHIDB's concerns be satisfactorily resolved, SHIDB is supportive of the applicant's proposal to disapply certain sections of the Land Drainage Act 1991 (LDA 1991) – which affect the consenting of activities under SHIDB Byelaws – so long as the Development Consent Order includes acceptable Protective Provisions for drainage authorities. Critically, the Protective Provisions must ensure the IDBs are granted | The Applicant welcomes SHIDB's acknowledgement that the proposed disapplication of relevant provisions of the Land Drainage Act 1991 can be appropriately addressed through protective provisions.<br>The Applicant is continuing to engage proactively with SHIDB regarding the drafting of protective provisions for their benefit and welcomes SHIDB's ongoing legal |

| Topic | Matter Raised | Applicant's Response |
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| | sufficient opportunity to consider and influence the detailed design of works that would otherwise (without disapplication of the LDA 1991) require Board consent. The Provisions must also allow SHIDB to set conditions on works as required for flood risk or environmental purposes, and must set out the Applicant's responsibilities for maintaining works affecting the drainage network. SHIDB is currently undertaking a legal review of the draft Protective Provisions and will seek to agree satisfactory wording with the applicant. We will endeavour to complete this process before the end of the planning examination, although this will depend on agreement of the wording by both parties. | review. The Applicant's intention is that the protective provisions as already included in the **Draft DCO** (Doc Ref. 3.1 Rev 2) provide SHIDB with an appropriate mechanism to review and approve detailed designs for works affecting its drainage assets, thereby ensuring that SHIDB's interests in relation to flood risk management, environmental protection and the operation and maintenance of the drainage network are appropriately safeguarded.<br><br>The Applicant notes that potential bespoke protective provisions for the benefit of SHIDB specifically remain under discussion between the parties and is committed to seeking agreement on their final form during the Examination. The Applicant is therefore satisfied that an appropriate framework exists to address SHIDB's concerns whilst avoiding duplication of consenting regimes.<br><br>The Applicant recognises that the Scheme is located within the districts of South Holland Internal Drainage Board (IDB) and North Level District IDB, and that the Boards' byelaws and consenting regimes apply unless otherwise disapplied. The Applicant is seeking to disapply sections 23 and 32 of the Land Drainage Act 1991, as well as the relevant IDB byelaws made under section 66 of that Act, and replace those controls with equivalent controls secured through appropriate |

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| | | protective provisions within the **Draft DCO** (Doc Ref. 3.1 Rev 2), in accordance with the Planning Act 2008 regime. 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. The latest position on those negotiations is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), which identifies the current status of engagement with South Holland IDB, including discussions relating to protective provisions and the protection of the Board's operational interests. The Applicant will continue to engage with South Holland IDB throughout the pre-examination and examination stages with a view to agreeing appropriate protective provisions and associated arrangements. |
| Consultation | SHIDB attended Meridian's stakeholder event (May 2025) and responded in writing to Meridian's statutory consultation (June 2026) and the two additional targeted consultations (October 2025 and February 2026). Further written representations were made by SHIDB to Meridian in December 2025 and in January, April and May 2026. Meridian met SHIDB (virtually) in June 2025 at SHIDB's request, and in October 2025 to | The Applicant has reviewed the meeting minutes from October 2025 and whilst queries were raised by SHIDB on the proposed drainage strategy during the meeting, no comments requesting changes to the drainage strategy were made. The Applicant shared the meeting minutes with SHIDB following the meeting and no comments on the minutes were received. The Applicant is committed to continuing engagement with |

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| | discuss hydraulic modelling and the draft Drainage Strategy. SHIDB raised several matters during the latter meeting, but Meridian's Outline Drainage Strategy (March 2026) [APP-227] incorrectly states "no comments were raised by the stakeholders on the proposed drainage strategy." Meridian has failed to sufficiently engage with SHIDB to discuss the concerns SHIDB has raised. SHIDB has since December 2025 made numerous requests for a meeting to discuss SHIDB's concerns, but Meridian has not facilitated this. SHIDB has queried whether the Applicant intends to provide a Statement of Common Ground, which would be expected before the Examination stage and would be best practice for clearly recording SHIDB's concerns and supporting discussions towards resolution. No SoCG has been provided and the Applicant has not responded to SHIDB's query. | SHIDB and will progress discussions with the aim to reach common ground on all matters raised. A **Statement of Common Ground with the Water Management Alliance (on behalf of South Holland IDB)** (Doc Ref. 8.16) has been prepared and is submitted at Deadline 1. |
| Conclusion | The Applicant's failure to progress discussions to consider SHIDB's multiple concerns means SHIDB is unable to support the Project. SHIDB currently lacks confidence that the proposals will not directly or indirectly impact drainage efficiency within the IDD. SHIDB therefore considers that Development Consent should not be granted until these matters are satisfactorily resolved. | The Applicant has engaged with SHIDB on the matters raised within its relevant representation, which included the provision of further information to give SHIDB confidence that any direct or indirect impacts would be appropriately managed. Discussions and progress towards reaching agreement will be captured within the Statement of Common Ground between the Applicant and SHIDB. |

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| Conclusion | SHIDB owns many arterial watercourses within the IDD. SHIDB has identified 20 watercourse crossing locations where the Meridian project will directly affect Board-owned land. Clarification is still required regarding the nature and extent of other project works affecting Board-owned land. | The Applicant remains engaged with SHIDB around their interest, the Scheme and the works required to facilitate the Scheme. The Applicant has engaged with SHIDB on the matters raised within its relevant representation, which included the provision of further information regarding the nature and extent of the project works affecting Board owned drains and land. Discussions and progress towards reaching agreement will be captured within the Statement of Common Ground between the Applicant and SHIDB. |

## 3.14. Spalding Energy Company Ltd (Intergen)

3.14.1. Table 3-14 below sets out the Applicant's response to the issues raised within the Relevant Representation from the Spalding Energy Company [RR-184] including signposting to the relevant sections of the DCO Application.

**Table 3-14: Spalding Energy Company**

| Topic | Matter Raised | Applicant's Response |
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| Introduction | This Relevant Representation summarises the principal concerns of Spalding Energy Company Ltd ("SECL") and Spalding Energy Expansion Ltd ("SEEL")(together, "InterGen"). InterGen will provide fuller detail, evidence and supporting documents in its Written Representation during the examination. 1.2. InterGen does not object in principle to the proposed Meridian Solar Farm (the "Scheme"). InterGen does, however, have serious concerns regarding the construction risk and AC interference risk to its pipeline infrastructure, which must be addressed within the DCO process before consent is granted. | Noted. Please see the Applicant's response to InterGen's points in the rows below. |
| Background | InterGen owns and operates a 950MW combined cycle gas turbine (CCGT) and a 300MW open cycle gas turbine (OCGT) at Spalding, Lincolnshire. Both plants are supplied with natural gas by a common 16" cross-country high-pressure gas pipeline of 7.2km in length, operating at a maximum operating pressure of 75barg (the "Pipeline"). The Pipeline runs from an above ground interface at Wragg Marsh to the Gas Reception Facility (GRF) adjacent to West Marsh Road, Spalding. | Noted. |

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| | Full details of the Pipeline route are given in drawings 9622-PL-001 to 008. 2.2. The Pipeline constitutes critical national infrastructure. It is subject to a strict safety and regulatory regime, details of which are set out in the consultation response referred to below. 2.3. Any interruption to gas supply through the Pipeline would directly affect InterGen's power generation capacity and its ability to provide critical ancillary services to the National Energy System Operator (NESO), including balancing and emergency supply services. 2.4. InterGen understands from the application materials that the Scheme's Grid Connection (predominantly a 400kV overhead electric line via steel lattice pylons, with a section of underground cable and associated cable sealing end compounds, connecting to the planned Weston Marsh B Substation), together with the Inter-Array Connections and associated construction works, may cross or run in proximity to the Pipeline. | |
| Engagement to Date | On 20 October 2025, InterGen submitted a detailed consultation response to Meridian Solar's targeted consultation letter dated 23 September 2025 (the "Consultation Response"). In that response, which InterGen will submit in full as part of its Written Representation during the examination, InterGen set out comprehensively the information requests, | 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. The latest position on those negotiations is set out in the **Land Rights** |

| Topic | Matter Raised | Applicant's Response |
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| | protections, safeguards and commitments it required before works could proceed in the vicinity of the Pipeline.<br><br>In summary, the Consultation Response sought (i) the execution of formal crossing agreements before construction commences; (ii) specific protective provisions in any Development Consent Order safeguarding our Pipeline and covering the cost of any protective works; (iii) full reimbursement of InterGen's reasonable costs and losses (including advisory and legal costs throughout consultation, design, construction and operation); (iv) the prior provision of detailed cable routing, siting, geotechnical, construction-access, methodology and risk-assessment information; and (v) ongoing direct consultation and regular liaison with InterGen.<br><br>A draft Protective Provisions document (the "PPs") was sent by InterGen to the Applicant's solicitors, Pinsent Masons, on 25 February 2026, stating that InterGen would expect these to be agreed and included in any Development Consent Order. The PPs set out, among other matters, requirements as to alternative apparatus, retained apparatus protection, advance submission of plans and method statements, acceptable security and acceptable insurance, a full indemnity, expenses, co-operation and arbitration. | **Tracker** (Doc Ref. 4.4 Rev 2), which identifies the current status of engagement with Spalding Energy Company Limited and Spalding Energy Expansion Limited, including discussions relating to protective provisions, asset protection requirements and the protection of the pipeline. The Applicant has provided comments on InterGen's draft protective provisions and discussions remain ongoing. The Applicant will continue to engage with Spalding Energy Company Limited and Spalding Energy Expansion Limited throughout the examination with a view to agreeing an appropriate form of protective provisions that safeguards the pipeline operators' interests and ensures that construction and operation of the Scheme do not compromise pipeline integrity or safety. |

| Topic | Matter Raised | Applicant's Response |
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| | Despite the time that has elapsed, the Applicant has provided no substantive response to the Consultation Response and no comments on the PPs. No progress has been made in agreeing the protections InterGen requires. In particular, no detailed information has been provided as to the impact on the Pipeline of the chosen cable routes, substation siting, construction traffic, access routes or traffic management near the Pipeline, and no cost undertaking has been offered – a matter InterGen considers particularly critical, since SECL and SEEL may have to enhance monitoring and physical protections to the Pipeline both during construction and in the longer term as a result of the additional 400kV overhead lines and cable crossings in the vicinity of the Pipeline.<br><br>InterGen places on record its serious concern that, notwithstanding its clear and early identification of its interests and infrastructure, the protections it seeks to ensure the safety and integrity of the Pipeline remain wholly unaddressed at the point at which the application has been accepted for examination. | |
| Construction Risk | The construction of the Grid Connection, Inter-Array Connections and associated works in proximity to or across the Pipeline poses a serious and material risk to its integrity and safety. In particular: (a) construction traffic movements over the buried Pipeline represent a | The Applicant notes the concern raised by InterGen regarding construction impacts and AC interference with their pipeline assets for the 400kV OHL. |

| Topic | Matter Raised | Applicant's Response |
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| | significant and sustained loading on buried infrastructure. Without prior pipeline survey, adequate protective slabs or bridging, and continuous monitoring, the risk of pipeline deformation, coating damage, or mechanical failure is real and material; (b) excavations near the Pipeline risk disturbing the Pipeline itself, its coatings or its cathodic protection systems, and damage to the cathodic protection system (whether through vehicle movements, ground compaction, or excavation) increases the risk of corrosion over time; (c) disturbance of above ground infrastructure, such as pipeline markers and cathodic protection test points, risks impairing the safe monitoring and operation of the Pipeline; and (d) any incident involving the Pipeline during construction – including a loss of containment of high-pressure natural gas – would present a major safety hazard to construction workers, the local area, and the public, and would likely require emergency shutdown of power generation at the Spalding site. The thermal hazard radius created by a rupture of the Pipeline could extend 249m from the Pipeline. | During the design development stage, consideration was given to the pipeline for pylon locations, working areas and construction accesses. Currently, pylon 4SV42 is 78m away from the pipeline from the centre and the stone working area is 40m away, therefore no impacts are envisaged on the pipeline. If the pylons move longitudinally within the limits of deviation during construction, this pipeline will be considered to inform the extent of which the pylon can move, and where necessary approval will be required from Spalding in accordance with the protective provisions being progressed between the parties.<br><br>In terms of construction access, a stone haul road is proposed over the pipeline to facilitate HGV access to construct the pylons and the overhead line. The Applicant will work with Intergen during the detailed design and construction phase to determine exact locations of the pipelines and the appropriate protection methodology (e.g., protection plates or bridging) based on pipeline specifications and intended use of the access (i.e., quantity and weight of construction vehicles). |
| AC Interference Risk | The introduction of new and modified high-voltage overhead transmission infrastructure in proximity to the Pipeline gives rise to a distinct and serious risk of AC interference, in particular: (a) there is a risk of AC | Regarding AC interference, at this stage of the Project no detailed interference studies have been carried out. The route of the overhead line and thus pylon positions are subject to the NGET Weston Marsh B |

| Topic | Matter Raised | Applicant's Response |
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| | corrosion due to low frequency inductive interference on the Pipeline from the power loads on the new overhead powerlines, which can result in high rates of corrosion in a relatively short time; (b) the AC interference from the new electrical infrastructure could create potentially fatal touch potentials on the Pipeline during fault conditions, which can affect the safety of personnel working on the Pipeline or any members of the general public who may come into contact with above ground connections on the Pipeline; and (c) the application materials do not, so far as InterGen has been able to ascertain, contain any adequate assessment of electromagnetic induction effects on the Pipeline, nor any agreed mitigation scheme, and any such study remains to be commissioned, agreed and concluded in consultation with InterGen's pipeline expert. | substation location, designs and proposed new and modified overhead lines in the area. These Meridian 4SV OHL and pylons are also subject to limits of deviation should they remain in their current location.<br><br>Therefore, future AC studies will be conducted to determine whether there will be any impacts on the Intergen pipeline, coupled with obtaining more information about the condition of the pipeline, it's material, coating and whether any AC mitigation already exists. As noted above, any necessary approvals in respect of impacts on its asset will be sought from InterGen at the point of detailed design in accordance with the protective provisions being negotiated between the parties. |
| Safety and integrity of the pipeline | The overall risk posed by the Scheme to the safety and integrity of the Pipeline is therefore serious and twofold: (1) firstly, a failure of the Pipeline would create a significant and foreseeable risk to public health and safety, including the risk of an uncontrolled release of high-pressure gas in a populated and agricultural area; and (2) secondly, the Pipeline is the sole means of gas supply to InterGen's 950MW CCGT and 300MW OCGT at Spalding, its 950MW CCGT | Measures in the form of protective provisions are being negotiated with InterGen, including the requirement for any AC mitigation. The Applicant will continue to engage with Spalding Energy Company Limited and Spalding Energy Expansion Limited throughout the examination with a view to agreeing an appropriate form of protective provisions that safeguards the pipeline operators' interests and ensures that construction and operation of the |

| Topic | Matter Raised | Applicant's Response |
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| | being regularly called upon to generate electricity for the national grid and to provide ancillary services to NESO. Any interruption to the Pipeline's operation would immediately curtail power generation capacity that forms part of Great Britain's critical energy supply infrastructure, with consequences extending beyond InterGen to the wider national energy system.<br><br>InterGen asks the Examining Authority to give substantial weight to both dimensions of this risk. The risk is not hypothetical; it is inherent in the Scheme as currently designed and remains unmitigated, no protective measures having yet been agreed.<br><br>All work near the Pipeline must comply with relevant technical standards, including Health and Safety Executive (HSE) guidance, Institution of Gas Engineers and Managers (IGEM) standards, the Gas Safety (Management) Regulations 1996 (as amended) and the Pipelines Safety Regulations 1996, and must be subject to InterGen's technical approval. | Scheme do not compromise pipeline integrity or safety. |
| Status and Responsibilities | InterGen acknowledges that it does not hold the formal status of a statutory undertaker for the purposes of the relevant planning and infrastructure legislation.<br><br>However, InterGen respectfully submits that its risk profile is, in all material respects, indistinguishable from | 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. The latest position on |

| Topic | Matter Raised | Applicant's Response |
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| | that of a statutory undertaker. It operates a 7.2km high-pressure gas pipeline, failure of which would have significant consequences for public safety and national energy security. The substance of the risk – to pipeline integrity, to public safety, and to security of energy supply – is the same regardless of the legal categorisation of the operator.<br><br>In InterGen's submission, the absence of statutory undertaker status should not determine the weight given to its representations or the protections to which it is entitled. InterGen therefore requests that the Examining Authority and the Applicant treat its representations and interests with the same seriousness and afford it the same level of engagement and protection, as would be accorded to a statutory undertaker in equivalent circumstances.<br><br>Consistent with that position, InterGen requests that the Applicant acknowledge and adhere to the following responsibilities in relation to the Pipeline: (a) to include specific protective provisions in the Development Consent Order safeguarding the Pipeline, in the form of the PPs already provided (or as otherwise agreed with InterGen); (b) to execute formal crossing agreements and any necessary deeds of consent before any works commence at points where the Scheme's infrastructure crosses or runs in proximity to | those negotiations is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2), which identifies the current status of engagement with Spalding Energy Company Limited and Spalding Energy Expansion Limited, including discussions relating to protective provisions, asset protection requirements and the protection of the pipeline. The Applicant has provided comments on InterGen's draft protective provisions and discussions remain ongoing.<br><br>The Applicant will continue to engage with Spalding Energy Company Limited and Spalding Energy Expansion Limited throughout the examination with a view to agreeing an appropriate form of protective provisions that safeguards the pipeline operators' interests and ensures that construction and operation of the Scheme do not compromise pipeline integrity or safety. |

| Topic | Matter Raised | Applicant's Response |
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| | the Pipeline; (c) to agree in writing a pipeline protection plan, including construction traffic management measures and AC interference mitigation measures, approved by InterGen's pipeline safety engineers; (d) to commission, agree and conclude, in consultation with InterGen's pipeline expert, a study of AC corrosion and induced interference effects on the Pipeline, together with any resulting mitigation; (e) to provide a cost undertaking, supported by acceptable security and acceptable insurance, covering all reasonable costs, monitoring, oversight, and any consequential losses arising from the works (including additional protections required to mitigate long-term effects of the new overhead lines on the Pipeline); (f) to provide InterGen with, and a reasonable opportunity to review and comment on, all relevant engineering information, including cable routing plans, substation and battery energy storage system (BESS) siting plans, geotechnical survey data, construction methodology, and risk assessments at Pipeline crossing points, together with confirmation of minimum separation distances; and (g) to establish ongoing direct consultation and regular liaison with InterGen throughout detailed design, construction planning and execution, and the operational phases affecting the Pipeline. | |

| Topic | Matter Raised | Applicant's Response |
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| Conclusions and Requests | For the reasons set out above, InterGen requests that the Examining Authority and the Secretary of State do not grant development consent, or do not authorise the commencement of any works in proximity to or across the Pipeline, until the responsibilities set out in paragraph 5.4 above have been secured to InterGen's reasonable satisfaction - in particular, (i) the inclusion of protective provisions (in the form of the PPs or as otherwise agreed with InterGen) in the Development Consent Order; (ii) the execution of formal crossing agreements and any necessary deeds of consent; (iii) an agreed and approved pipeline protection plan (including construction traffic management and AC interference mitigation measures); (iv) a cost undertaking supported by acceptable security and acceptable insurance; and (v) the provision to InterGen of, and a reasonable opportunity to review and comment on all relevant engineering information at Pipeline crossing points.<br><br>InterGen also requests that the Examining Authority and the Applicant: (1) treat the Pipeline as critical national infrastructure in the examination and determination of the application, consistent with paragraph 5.3 above; and (2) formally notify InterGen of the progress and outcome of the examination, and of any further consultations, amended plans or | The Applicant notes InterGen's request for protections in respect of the Pipeline and confirms that it is engaging with Spalding Energy Company Limited and Spalding Energy Expansion Limited (subsidiaries of InterGen) to agree an appropriate package of protections.<br><br>The Applicant is seeking to agree bespoke protective provisions to regulate the exercise of DCO powers in the vicinity of the Pipeline. The latest position on those discussions is set out in the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2). The Applicant has reviewed and provided comments on InterGen's draft protective provisions and negotiations remain ongoing.<br><br>The Applicant will continue to engage constructively with Spalding Energy Company Limited and Spalding Energy Expansion Limited throughout the Examination with a view to agreeing appropriate protections for the Pipeline, including arrangements relating to works in proximity to the Pipeline, information sharing, approvals and ongoing consultation. The Applicant considers that these matters are appropriately addressed through ongoing negotiations between the parties and does not consider that they constitute a reason for refusing development consent.<br><br>The Applicant recognises the importance of the Pipeline and will continue to consult with InterGen |

| Topic | Matter Raised | Applicant's Response |
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| | supporting technical documents relating to the Scheme.<br><br>InterGen wishes to register as an Interested Party and to participate in the examination of the application, including any Preliminary Meeting and hearings, and looks forward to constructive engagement with the Applicant to resolve these matters satisfactorily. | throughout the Examination process. InterGen's participation as an Interested Party is noted, and the Applicant looks forward to continuing constructive engagement with a view to resolving the outstanding matters. |
| Reservation of Rights | InterGen reserves the right to make further representations as additional information becomes available, including in response to any further consultation documents, amended plans, or supporting technical documents submitted in connection with the application. Nothing in this representation should be taken as waiving or limiting any rights that InterGen may have in connection with the matters raised above. Supporting documents (to be submitted during the examination): (1) the Consultation Response dated 20 October 2025; and (2) the draft Protective Provisions sent to the Applicant's solicitors, Pinsent Masons, on 25 February 2026. | The Applicant notes these comments. |

## 3.15. UK Health Security Agency

3.15.1. Table 3-15 below sets out the Applicant's response to the issues raised within the Relevant Representation from the UK Health Security Agency [RR-207] including signposting to the relevant sections of the DCO Application.

**Table 3-15: UK Health Security Agency**

| Topic | Matter Raised | Applicant's Response |
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| General | With respect to Registration of Interest documentation, we are reassured that earlier comments raised by us on 24th June 2024 have been addressed. In addition, we acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly affect public health. | The Applicant welcomes UKHSA's position. |
| Environmental Public Health | Contaminated Land Potential impacts arising from historic ground contamination have been considered in the draft development consent order and there is a requirement that a scheme to assess and manage these impacts, be agreed with the relevant local authority in consultation with the Environment Agency, as the relevant regulatory authorities with regards to contaminated land. | In accordance with the **OCEMP** (Doc Ref. 7.10 Rev 2) Table 3-6, intrusive geo-environmental works will be undertaken prior to the commencement of construction. Should any potentially contaminated ground, including isolated 'hotspots' of contamination and/or potential deposits of asbestos containing materials (ACM), be encountered, the Principal Contractor would be required to investigate the areas and assess the need for containment or disposal of the material. The Principal Contractor would also be required to assess whether any additional health and safety measures are required. The provisions of the OCEMP inform the preparation of the detailed CEMP (which must be in substantial accordance |

| Topic | Matter Raised | Applicant's Response |
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| | | with the OCEMP) which in turn would need to be approved by South Holland District Council in consultation with the Environment Agency, in accordance with Requirement 12 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). The Applicant is therefore confident that the DCO Application contains adequate controls to ensure that any ground contamination is addressed appropriately. |
| Electric and Magnetic Fields (EMF) | It is noted that an EMF report has been prepared as part of the ES: EN010169-000135-7.8 EMF Compliance Report.pdf However, the exposure assessment is based on typical exposures from an arbitrary powerline. It is unclear whether the powerline design chosen for the calculations provide a conservative assessment of the proposed 400 kV powerline. UKHSA advises that according to the following voluntary Code of Practice (p.5), for high voltage power lines exceeding 132 kV, a calculation or measurement of the maximum fields directly under the line is required to demonstrate compliance with ICNIRP exposure guidelines. | The **Electric and Magnetic Fields Compliance Report** [APP-273] provides a conservative assessment of the electric and magnetic fields (EMFs) associated with the Scheme.<br><br>With respect to assessment of a typical powerline, the most comprehensive source of EMF information, www.EMFs.info, states that there are many factors that affect the EMFs that an overhead line produces, but in general, overhead lines of the same voltage will produce similar fields. Furthermore, an overhead line producing its maximum theoretical field (when carrying its maximum current) rarely, if ever, occurs. Therefore, although the assessment has not considered a specific powerline, the values are considered appropriate to inform the assessment.<br><br>The **Electric and Magnetic Fields Compliance Report** [APP-273] confirms that the EMFs |

| Topic | Matter Raised | Applicant's Response |
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| | | associated with the Scheme do not exceed the public exposure limits established within the ICNIRP guidelines directly underneath the 400kV and 132kV overhead lines. Furthermore, it is noted that the closest residential receptors to the 400kV and 132kV overhead lines are at an approximate distance of 70m, on the basis of the illustrative design. EMFs at the residential receptor locations reduce exponentially with distance, as demonstrated by figures included in Section 4 of **Electric and Magnetic Fields Compliance Report** [APP-273]. |
| Decision not to register as an Interested Party | Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health. On that basis, we have no additional comments to make at this stage and can confirm that we have chosen NOT to register an interest with the Planning Inspectorate on this occasion. | The Applicant notes this response and thanks UKHSA for its confirmation that the Scheme will not result in any significant adverse effect on public health. |

# 4. Applicant's Response to Parish Councils

## 4.1. Overview

4.1.1. The tables below set out the responses to the Relevant Representations from parish councils and the response from the Applicant.

4.1.2. Where text within the representations summarises the documentation submitted by the Applicant, it has not been reproduced in the tables below.

## 4.2. Deeping St James Parish Council

4.2.1. Table 4-2 below sets out the Applicant's response to the issues raised within the Relevant Representation from Deeping St James Parish Council [RR-039] including signposting to the relevant sections of the DCO Application.

**Table 4-2: Deeping St James Parish Council**

| Topic | Matter Raised | Applicant's Response |
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| Loss of high quality arable land | 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. | 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 Rev 1). Whilst the Applicant acknowledges that the Scheme would result in moderate adverse (significant) effects in relation to the presence of solar infrastructure and hard standing on BMV agricultural land, the Applicant has appropriately balanced the use of this agricultural land with other constraints, such as flood risk and the presence of heritage assets within the Order Limits. The **OSMP** (Doc Ref. 7.14 Rev 1) provides measures to mitigate the impact on soil resources, and the land can be returned to agricultural use following the decommissioning of the Scheme. |

| Topic | Matter Raised | Applicant's Response |
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| | | The Applicant has taken these significant adverse effects into account in its planning balance set out within the **Planning Statement** [APP-260]. The Applicant has developed the Scheme to avoid, reduce and mitigate adverse effects through application of the mitigation hierarchy and consideration of good design, but it is the nature of large-scale infrastructure projects that adverse effects cannot always be avoided or fully mitigated. The status of the Scheme as a CNP infrastructure means that residual impacts, including on agricultural land, should not outweigh the urgent need for the Scheme in the planning balance. There are no residual impacts on any of the exceptions listed at paragraph 4.2.98 of EN-1 nor are any exceptional circumstances present that would reverse this presumption. The Applicant maintains its view, that while the significant adverse agricultural land effects reported will attribute some negative weight in the planning balance, the substantial benefits and urgent need for the Scheme outweigh these adverse impacts. |

## 4.3. The Moulton Parish Council

4.3.1. Table 4-3 below sets out the Applicant's response to the issues raised within the Relevant Representation from Moulton Parish Council [RR-199] including signposting to the relevant sections of the DCO Application.

**Table 4-3: Moulton Parish Council**

| Topic | Matter Raised | Applicant's Response |
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| Scale of project | The scale of the Meridian Solar Farm is extremely large, covering more than 2,700 acres of productive farmland. We are concerned about the loss of agricultural land, the industrialisation of the rural landscape, and the cumulative impact alongside other major energy infrastructure proposed for Lincolnshire. | The UK Government has identified through its energy policy, most recently in the National Policy Statement (NPS) EN-1 and NPS EN-3 , 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><br>While the Scheme would result in moderate adverse (significant) effects in relation to the presence of solar infrastructure and hard standing on BMV land, the Applicant has appropriately balanced the use of this agricultural land with other constraints including flood risk and the presence of heritage assets within the Order Limits. The **OSMP** (Doc Ref. 7.14 Rev 1) provides measures to mitigate the impact on soil resources, and the land can be returned to agricultural use following the decommissioning of the Scheme.<br><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 |

| Topic | Matter Raised | Applicant's Response |
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| | | within **ES Appendix 12-4: Landscape Assessment** [APP-238] and summarised within Section 12.8 of **ES Chapter 12: Landscape and Visual** [APP-063].<br><br>Based on previous reporting as part of other NSIPs in Lincolnshire and the extrapolation of available mapping, the proportion of BMV land in the county is estimated to be in the order of 71%. It is estimated that the cumulative impact of solar schemes will account for approximately 3% of all BMV land in Lincolnshire. 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.<br><br>The Cumulative Effects section within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 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. |
| Construction traffic and safety | We are also concerned about construction traffic, road safety. | The Applicant notes the stakeholder's concerns regarding construction traffic and road safety.<br><br>The impacts on the road safety of local roads which would be used by construction traffic associated with the Scheme has been included as part of the traffic assessment outlined in **ES Chapter 15: Traffic and** |

| Topic | Matter Raised | Applicant's Response |
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| | | **Access** [APP-066], which concluded that there would be no significant effects as a result of the Scheme. This is based on detailed and robust analysis of Personal Injury Collision (PIC) data presented in **ES Appendix 15-4: Transport Assessment Note** (TAN) [APP-251].<br><br>The Applicant has developed an **OCTMP** [APP-278 and APP-279] which includes a range of measures to manage construction traffic and maintain highway safety throughout the construction phase. These measures include controls on construction traffic routing, timing and phasing, restrictions on HGV movements during peak periods, a Delivery Management System, workforce shuttle bus provision and traffic monitoring measures.<br><br>Mitigation measures such as the use of traffic marshals at site accesses and crossing points during the construction phase are detailed in the OCTMP. The Applicant has also given detailed consideration to traffic routing, access arrangements, passing opportunities and the safe movement of construction traffic on the local highway network.<br><br>The detailed traffic management measures will be secured through the Detailed CTMP, which will be prepared in accordance with the OCTMP and secured by way of Requirement 15 in the **Draft DCO** (Doc Ref. 3.1 Rev 2). The Applicant therefore considers that |

| Topic | Matter Raised | Applicant's Response |
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| | | appropriate assessment, mitigation and management measures have been identified to ensure construction traffic can be accommodated safely whilst minimising effects on local residents, businesses and other road users. |
| Noise | We are also concerned about… noise. | **ES Chapter 13: Noise and Vibration** [APP-064] assesses the impact of noise and vibration on human receptors. Details on how construction noise and vibration emissions will be minimised as far as reasonably practicable are provided in the **OCEMP** (Doc Ref. 7.10 Rev 2).<br><br>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 Preliminary Environmental Information Report (PEIR). **ES Chapter 13: Noise and Vibration** [APP-064] concludes that during the operational phase, there would be no significant adverse effects following the implementation of mitigation measures. This includes a commitment to achieve noise limits secured in the **OOEMP** (Doc Ref. 7.11 Rev 1) and Requirements 13 and 18 of the **Draft DCO** (Doc Ref. 3.1 Rev 2) and if necessary, utilisation of 'low noise' versions of substation transformers. |

| Topic | Matter Raised | Applicant's Response |
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| Effects on residents, businesses and visitors | We are also concerned about… long-term effect on local residents, businesses and visitors who rely on the open countryside and rural character of this area. | **ES Chapter 14: Socio-Economics and Land Use** [APP-065] assesses community and economic effects arising from the Scheme. In line with **ES Chapter 4: Overview of the EIA Process** [APP-055], long-term effects are those experienced for longer than 10 years, and is therefore associated with the operation of the Scheme. The assessment of impacts set out in Section 14.8 has considered impacts on economy and community assets from the operation of the Scheme, which concludes that there would be no significant effects on relevant economic and community resources/receptors as a during operation of the Scheme. |
| Conclusion | What we want the Examining Authority to consider: we ask the Examining Authority to fully assess:<br>• the scale and footprint of the development<br>• the loss of productive farmland<br>• the cumulative impact with other energy projects in Lincolnshire<br>• the effect on landscape character and visual amenity<br>• construction traffic and road safety<br>• long-term community and economic impacts | The Applicant has responded to these points in the responses provided above. |

| Topic | Matter Raised | Applicant's Response |
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| | We believe these issues are significant and require detailed examination.<br><br>We wish to be kept informed and involved throughout the examination process. | |

# 5. Applicant's Response to Non-Statutory Organisations

## 5.1. Overview

5.1.1. The tables below set out the responses to the Relevant Representations from non-statutory organisations and the response from the Applicant.

## 5.2. Brown & Co Property and Business Consultants

5.2.1. Table 5-2 below sets out the Applicant's response to the issues raised within the Relevant Representations from Brown & Co Property and Business Consultants who represent a number of the affected landowners within the Scheme [RR-015, RR-016, RR-017] including signposting to the relevant sections of the DCO Application.

**Table 5-2: Brown & Co Property and Business Consultants**

| Topic | Matter Raised | Applicant's Response |
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| Land Type and Impact on Farming | The proposal dissects some of the highest-quality Grade 1 agricultural land, characterised by the highly productive Lincolnshire Fen silts. These soils are renowned for their uniform texture, excellent structure and exceptional moisture-retention capabilities. Their workability across a wide range of weather conditions allows growers to undertake timely cultivations and drilling, which is critical for premium vegetable and root crop production. This land type is nationally scarce and prized for its consistently high yields, making it among the | The Applicant recognises that the ALC grade of the land is a relevant consideration. The potential effects on agriculture and soils have been considered within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1, with impacts on agricultural businesses considered within **ES Chapter 14: Socioeconomics and Land Use** [APP-065].<br><br>The selection of an overhead line as the preferred technology for the Grid Connection is guided by national policy contained in the NPS for Electricity Networks EN-5 which states that it is the Government's position that overhead lines should be the starting presumption for electricity networks. Within the Grid Connection Route and the Inter-Array Connections, the Scheme would have a minimal impact on the area of land |

| Topic | Matter Raised | Applicant's Response |
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| | most valuable agricultural resources in the UK. It supports intensive rotations of high-value crops, many of which require pristine soil conditions, precise field operations and unimpeded access for large machinery.<br><br>Should the project proceed with the overhead electricity line option for the grid connection, the disruption to farming activities would be significant and continuous throughout the lifetime of the scheme. Tower bases, support structures, pole foundations and associated easements would permanently sterilise productive land, while the overhead conductors would impose restrictions on machinery height, creating operational hazards for modern equipment such as self-propelled harvesters, sprayers and irrigation booms. Routine farming operations would be further disrupted by the need to navigate around tower bases, resulting in irregular field shapes, increased headland areas and consequential reductions in operational efficiency. These inefficiencies can materially increase fuel consumption, labour requirements and machinery wear, while also | farmed and therefore is not likely to result in a loss of agricultural jobs.<br><br>Functionality of agricultural production is considered in siting of infrastructure near field boundaries, where reasonably practicable. Existing access points from the highway via gates, gaps in vegetation and existing agricultural access points have been selected. Where reasonably practicable, access routes follow field boundaries. Operational access would be taken from the access locations listed within Table 2-2 of **ES Chapter 2: The Scheme** [AS-017] and shown on **ES Figure 2-5: Construction, Operational and Decommissioning Accesses** [APP-077]. For future access, the Applicant will notify the landowner of their intended access and ensure the most efficient and least impactful path is taken to the Scheme in accordance with landowner agreements with the impacted landowners.<br><br>The overhead line has been designed to a minimum clearance of 8.5m from the conductors to the ground; a value of which exceeds the minimum statutory requirements as set out in the 'The Electricity Safety, Quality and Continuity Regulations 2002 (ESQCR 2002)' and by the 'ENA Technical Specification 43-8' (due to the absence of LiDAR data), which allow for the passage of high-sided vehicles underneath. As per ENA Technical Specification 43-8, safe systems of work are expected to be implemented by third parties whenever they intend to work near overhead lines, including passage of plant |

| Topic | Matter Raised | Applicant's Response |
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| | reducing overall yield due to compacted or underutilised areas.<br><br>The presence of overhead infrastructure also compromises precision-farming practices, including GPS-guided drilling and band-spraying, due to signal interference and the creation of unavoidable unproductive zones.<br><br>Taking prime agricultural land out of production reduces the volume of British-grown produce entering the supply chain. This is particularly concerning in regions such as the Fens, where concentration of high-value crops plays a central role in the UK's food-security network.<br><br>During the construction phase, the impact is amplified: soil compaction, temporary land take, access routes and storage compounds collectively impair productive capacity and disrupt established rotations. These effects can reverberate across the wider agricultural | or vehicles exceeding the basis of the overhead line design and also use of irrigators, slurry guns and high-pressure hoses in the vicinity of an overhead line. In most clearance, OHL clearances to ground would be even greater due to variations in ground level and because the minimum clearance is typically towards the middle of the span and increases closer to the pylons on either side.<br><br>Good practice environmental management measures have been set out within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1). 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. The **OSMP** (Doc Ref. 7.14 Rev 1) outlines a comprehensive set of measures across the lifetime of the Scheme for the preservation of the soil resource within the Order Limits, avoiding both the loss of soil material from the Order Limits and the loss of soil functional capacity for soil retained within the Order Limits. The **OSMP** (Doc Ref. 7.14 Rev 1) sets out that reinstatement will aim to restore agricultural land to its original grade.<br><br>With regards to the potential impact on food security, DEFRA's UK Food Security Report 2024[53] identifies that "*food* |

[53] DEFRA (2024) United Kingdom Food Security Report 2024. Available at: https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2024 [Accessed 29/07/2026]

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | and horticultural supply chain, influencing packhouse throughput, contractual fulfilment, and the availability of seasonal produce to retailers and processors. In the longer term, any permanent loss or degradation of Grade 1 land represents an irreplaceable reduction in national agricultural capability. | *production levels can be maintained or increased alongside the land use change required to meet our Net Zero and Environment Act targets*". Land use change associated with solar development is not identified as a risk to food security in the UK. |
| Drainage systems | Drainage systems—critical to the performance of Fenland soils—may also be disrupted during installation and maintenance activities, with long-term consequences for soil structure, water management and crop performance. | Impacts on land drainage are considered within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1).<br><br>In addition, the **OCEMP** (Doc Ref. 7.10 Rev 2) sets out a series of measures to ensure existing field drainage functionality is maintained during and after construction. These include:<br><br>• 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><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><br>• Reinstating or diverting any affected field drainage where reasonably practicable, with landowners and occupiers informed about the design and timing of |

| Topic | Matter Raised | Applicant's Response |
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| | | drainage works, including any changes to pipe layout, falls, dimensions and outfalls.<br><br>With these measures in place, no significant adverse long-term effects on land drainage capacity or agricultural productivity are anticipated. |
| Proximity to Residential Dwelling | Due to the transmission of the electricity generated by the proposed solar farm development being via an overhead line, the extent of the visual impact is significantly greater than an underground installation. Plans within the various documents provided on the project's website show pylons located in the land directly adjacent residential dwellings.<br><br>This proximity will undoubtedly have a detrimental impact on the marketability and value of the properties, by diminishing attractiveness as well as benefits of those located in private settings in the open countryside. | In accordance with NPS EN 5[54], 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** [APP-054], with associated landscape effects assessed within **ES Chapter 12: Landscape and Visual** [APP-063].<br><br>However, moderate adverse (significant) visual effects may arise for some visual receptor groups, where there are views into the Site. Effects are most likely to arise for receptors |

[54] Department for Energy Security and Net Zero (2025) National Policy Statement for electricity networks infrastructure (EN-5), 2025. Available at: https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5-2025 (Accessed: 31 July 2026)

| Topic | Matter Raised | Applicant's Response |
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| | Not only would an electricity pylon/overhead line negatively affect property in terms of its position in the residential marketplace, but it will also impact owner's/occupier's right to quiet enjoyment of their dwellings. Due consideration needs to be given to how such disturbance will be mitigated and/or compensated for; plans for such also need to be shared well in advance of any development taking place to allow householders to understand changes and, where necessary, seek professional advice.<br><br>The connection point at Weston Marsh would place overhead infrastructure in close proximity to residential properties, resulting in:<br><br>• Loss of enjoyment of private gardens and outdoor spaces<br><br>• Reduced tranquillity due to the presence of high level infrastructure or affected residents, this would materially diminish the quality of everyday life and contradict expectations of reasonable living conditions within a settled community. | 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.<br><br>The route of the proposed Meridian 400kV OHL to the NGET Grimsby to Walpole Weston Marsh B substation is largely dictated by the location of the proposed substation itself and existing and proposed new assets in the area. The Applicant has sought to maximise the stand-off from residential receptors, where reasonably practicable. The proposed 400kV OHL has been designed in accordance with the Holford Rules, avoiding areas of amenity value whilst minimising changes in direction thus introducing fewer angle pylons. In addition, the OHL has been designed through balancing a variety of localised constraints such as ecology, vegetation impacts, land use, topography, major crossings (e.g., roads, existing electricity lines). Where residential properties exist, the OHL has been designed to maximise stand-off, and where properties exist on both sides, it has been routed to manage the stand-off distances to residential receptors on either side of the alignment. A result, there may be locations across the Grid Connection Route where pylons or conductors are located in land adjacent to residential dwellings. |

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| | Planning decisions must consider perceived harm, not only technical compliance. Residents should not be expected to live under or alongside intrusive infrastructure that generates ongoing concern for health and safety.<br><br>The objection is particularly strong due to the apparent failure to properly justify the use of overhead lines at this connection point.<br><br>• Underground cabling or alternative routing away from residential areas has not been convincingly discounted<br><br>• National and local planning policy encourages infrastructure to be designed and sited to minimise harm to communities<br><br>• The current proposal prioritises cost and convenience over residential protection<br><br>Where homes are affected to this extent, higher standards of mitigation should apply. | Furthermore, following the statutory consultation period, the 400kV OHL north of Austendike Road was modified to route in parallel with the proposed National Grid Electricity Transmission (NGET) Grimsby to Walpole proposed OHL's in attempt to keep infrastructure together and as such, minimise the spread of visual effects. |
| | Although electromagnetic fields (EMFs) may fall within regulated limits, the perceived health risks associated with living close to | The Applicant is committed to meaningful engagement with local people to minimise impacts on health and wellbeing, as a result of stress and anxiety. As set out in the **OCEMP** (Doc |

| Topic | Matter Raised | Applicant's Response |
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| | overhead power lines are well documented in planning considerations. This perception alone can cause stress, anxiety and loss of wellbeing. It also raises concerns about the suitability of the location when close to homes. | Ref. 7.10 Rev 2) and in accordance with Requirement 4 of the **Draft DCO** (Doc Ref. 3.1 Rev 2), prior to the commencement of construction, a Community Liaison Group will be set up, acting as a formal forum for local issues to be raised. A Community Liaison Officer will be appointed to lead discussions with local communities and also act as the primary point of contact should there be any queries or complaints.<br><br>The Applicant considers that meaningful engagement with the local community would alleviate stress and anxiety which may be experienced with regards to the Scheme. |
| Access for Construction Traffic | Due to the number and size of projects proposed in the Weston Marsh area, a larger amount of construction traffic would be expected for the 24-to-36-month duration of the installation programme. Accommodation works will allow for such traffic to be able to access the site, but the current size and configuration of access routes means that disruption is inevitable.<br><br>Not only will this cause personal disturbance it could potentially disrupt the business; for example, the movement of agricultural machinery across the farm for all types of farming operations throughout the calendar year as well as goods vehicles collecting | The impact of road traffic, including cumulatively with other schemes in the area, is assessed in **ES Chapter 15: Traffic and Access** [APP-066]. The Scheme has been designed with multiple access points to distribute construction traffic across the road network and avoid significant effects. The core working hours during construction phase are also timed so that the bulk of traffic movements occur outside local road network peak hours, as set out in the **OCTMP** [APP-278 and APP-279].<br><br>The Applicant acknowledges that roads within the Weston Marsh area are predominantly rural in nature and that there is potential for interaction between construction traffic and existing agricultural activities, including the movement of agricultural machinery and vehicles associated with seasonal farming operations and the collection of produce. Traffic |

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| | produce from fields or yards. Additionally, given the weather-dependent nature of both agriculture and construction, traffic for both will invariably be greatest at the same time. The highways in question are small country roads that will struggle to cope with the additional traffic movements during construction. | management measures, including controls on construction traffic routing, timing and phasing, are set out in the **OCTMP** [APP-278 and APP-279] and will be implemented through the CTMP secured by way of Requirement 15 in the **Draft DCO** (Doc Ref. 3.1 Rev 2). These measures are intended to limit the duration and potential impacts of construction traffic on the local highway network and to minimise disruption to local residents, businesses, agricultural operations and other road users as far as reasonably practicable, and will continue to be accounted for during the detailed construction planning process.<br><br>The Applicant has given detailed consideration to narrow rural roads, passing opportunities, traffic routing, timing, access arrangements and the need for additional passing places during the construction, operational and decommissioning phases of the Scheme in the OCTMP. The Applicant is also developing a Temporary Passing Place Strategy and will continue to engage with the relevant highway authorities regarding access arrangements and any additional mitigation measures considered necessary to facilitate the safe movement of construction traffic whilst minimising disruption to local residents, businesses and road users. Temporary highway works have also been identified where required, including the provision of passing bays along Martins Road and Langary Gate Road, which would be delivered through the OCTMP. |

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| | | The Applicant acknowledges the concern regarding the length of time construction traffic would operate. Construction traffic effects, including their duration, have been considered as part of the assessment reported in **ES Chapter 15: Traffic and Access** [APP-066].<br><br>While the Applicant acknowledges that some temporary disruption may occur during the construction period, the assessment concludes that, with the proposed mitigation measures in place, the effects of construction traffic would not be significant in EIA terms. The Applicant therefore considers that appropriate mitigation and management measures have been identified and will be introduced to ensure construction traffic can be safely accommodated whilst maintaining access to local businesses, farms and the surrounding road network. |
| | The installation of overhead pylons and associated concrete foundations will cause irreversible ecological damage. Each pylon requires a substantial footprint, often involving deep concrete bases and access tracks, which permanently remove habitat and fragment the surrounding landscape. These structures disrupt soil profiles, compact subsoils, and eliminate vegetation, leading to long-term degradation of biodiversity and ecosystem function. | **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) assesses the potential impacts and likely significant effects of the Scheme on ecological receptors. The sensitivity of the habitats located within the Order Limits, including their potential to support protected and notable species and their wider availability within the study area, have all been factors in determining the likely significant effects. The assessment concludes that no significant adverse effects are expected on ecology or biodiversity, with the implementation of the mitigation measures included within the management plans submitted with the DCO Application (including the **OCEMP** (Doc Ref. 7.10 Rev 1), **OOEMP** (Doc Ref. 7.11 Rev 1), **ODEMP** |

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| | The ecological footprint of overhead infrastructure is not limited to the construction phase. The permanent presence of pylons and access routes introduces ongoing disturbance, soil erosion, and weed colonisation, which further degrade the surrounding environment.<br><br>Unlike underground cabling, which allows for full reinstatement of surface habitats, overhead pylons represent a permanent loss of ecological value. Given the availability of undergrounding as a viable alternative, the decision to install overhead pylons across ecologically sensitive landscapes is unjustifiable and contrary to national biodiversity and land stewardship objectives. | (Doc Ref. 7.12 Rev 1) and **OLEMP** (Doc Ref. 7.16 Rev 1)). With regards to underground cabling, the Applicant notes that such a solution would equally require ground disturbance during construction and potentially occasional disturbance during the operational period for maintenance.<br><br>Ecological impacts from the presence of the overhead line during the operational phase are mainly associated with collision risk. Bird diverters have been specified for inclusion on the overhead line to mitigate impacts associated with collision risk, as set out within the **Design Parameters** (Doc Ref. 7.4 Rev 2) and the **OOEMP** (Doc Ref. 7.11 Rev 1).<br><br>As part of the landscape design for the Scheme, new habitats would be provided to increase biodiversity compared to the existing baseline. This would include converting areas of agricultural land around and beneath the solar PV panels into species rich grassland, providing new tree and shrub planting along field boundaries, and enhancing habitats next to watercourses. The Solar Development Area incorporates approximately 174ha of habitat management areas where no physical infrastructure is proposed. Out of this, over 150ha have been specifically set aside for the enhancement of habitats for farmland birds, such as skylark. The creation and subsequent management of habitats is detailed within the **OLEMP** (Doc Ref. 7.16 Rev 1), included as part of the DCO Application. Further details are provided within the **Biodiversity Net Gain Report** (Doc Ref. 7.9 Rev 1). |

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| | | The impact of the Scheme on agriculture and soils has been assessed within **ES Chapter 5: Agriculture and Soils** (Doc Ref 6.1 Rev 1) which concludes that no significant effects are expected on the soil resource within the Order Limits, however, a significant effect is acknowledged from the long-term restriction of BMV land within the Solar Development Area. Impacts on soils would be managed and mitigated through measures set out within the **OSMP** (Doc Ref. 7.14 Rev 1), including measures for soil handling, storage and reinstatement.<br><br>In terms of the soils, the land would be restored to its original use (typically agricultural) and returned to the relevant landowners once the decommissioning phase is complete. All above-ground physical infrastructure would be dismantled and removed during the decommissioning phase, including pylons and associated infrastructure.<br><br>In addition, below ground infrastructure, such as concrete foundations to these elements, 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>Decommissioning activities would be controlled through the DEMP, which would be prepared in accordance with the **ODEMP** (Doc Ref. 7.12 Rev 1), with a detailed plan required to |

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| | | be approved prior to decommissioning, as secured through the **Draft DCO** (Doc Ref. 3.1 Rev 2). |
| | The route intersects areas of ecological sensitivity, including farmland margins, hedgerows, and wetland corridors — all of which serve as critical habitats for birds, pollinators, and small mammals. Overhead lines pose a well-documented collision risk to birds, particularly species with poor forward vision such as swans, geese, and waders. These risks are exacerbated in low-visibility conditions and along migratory flight paths. In addition, birds of prey and corvids are known to perch on pylons, where they may be electrocuted if they bridge live components.<br><br>Beyond direct mortality, the presence of pylons can lead to displacement, where species avoid previously suitable habitats due to visual disturbance, noise, or increased human activity during construction and maintenance. This can have cascading effects on local populations and breeding success. | **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1)assesses the impact of the Scheme on biodiversity and wildlife. The assessment concludes that no significant adverse effects are expected during the construction, operational or decommissioning phases, with the implementation of mitigation measures set out within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1), **ODEMP** (Doc Ref. 7.12 Rev 1) and **OLEMP** (Doc Ref. 7.16 Rev 1). These include appropriate buffer/exclusion zones from edge habitats, hedgerows and wetland corridors.<br><br>Ecology and ornithology, including bird safety, have been considered throughout the assessment and in full consultation with Natural England. Consultation included agreement on survey methodology, findings and subsequent mitigation requirements. Where necessary bird diverters, including night visual diverters (where necessary), are to be installed on applicable overhead lines, in accordance with the **Design Parameters** (Doc Ref. 7.4 Rev 2) and the **OOEMP** (Doc Ref. 7.11 Rev 1). The diverters will reduce the collision risk associated with the overhead lines during operation.<br><br>As part of the landscape design for the Scheme, new habitats would be provided to increase biodiversity compared to the existing baseline. This includes converting areas of agricultural |

| Topic | Matter Raised | Applicant's Response |
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| | | land around and beneath the solar PV panels into species rich grassland, providing new tree and shrub planting along field boundaries, and enhancing habitats next to watercourses. In doing so, reducing herbicide use and runoff into watercourses. The Solar Development Area incorporates approximately 174ha of habitat management areas where no physical infrastructure is proposed. Out of this, over 150ha have been specifically set aside for the enhancement of habitats for farmland birds, such as skylark. This creation and management will also benefit invertebrates and small mammals.<br><br>The creation and subsequent management of habitats is set out within the **OLEMP** (Doc Ref. 7.16 Rev 1), included as part of the DCO Application. |
| Failure to provide undertakings for professional fees | The scheme is an NSIP, consequently landowners affected by the scheme are entitled to experienced professional representation, the reasonable cost of which should be met by the scheme. To date the scheme has refused to pay surveyors fees where landowners are affected by the cable route placing parties at a disadvantage and contravening the compensation code. | The Applicant will cover reasonably incurred professional fees in relation to Heads of Terms as set out in their correspondence and ongoing discussion with both landowners and their agents where they are affected by the Scheme. The Applicant has an agent fee scale published on their website, and has confirmed that reasonable surveyor's fees will be met in accordance with the compensation code, directly with Brown & Co. amongst other agencies. |
| Proximity to Ancient Scheduled Monument | Although legislation and relevant bodies will govern the requirements for developments in the vicinity of areas of historical importance, | **ES Chapter 3: Alternatives and Design Evolution** [APP-054] presents a summary of consideration of alternatives. Impacts on heritage assets, including Wykeham Chapel Scheduled |

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| | the proximity of the overhead line to an Ancient Scheduled Monument is noteworthy. Within the scheduled monument site there is the Grade I listed Wykeham Chapel of St Nicholas and Grade II listed Chapel Farmhouse, all of which is adjacent to the scheme's 'anticipated location for the Weston Marsh substation'.<br><br>Additional consideration for the suitability of an overhead installation should be taken given the situation of the protected sites in relation to the proposed route corridor.<br><br>National planning policy is clear that great weight must be given to the conservation of designated heritage assets, including their setting, and that harm should be avoided wherever possible. Even where harm is considered "less than substantial", it must be clearly and convincingly justified and weighed against public benefits.<br><br>In this case, the project has not demonstrated that:<br><br>• The harm to heritage assets and their settings is unavoidable | Monument, Grade I listed Chapel building and Grade II listed Chapel Farmhouse formed an important part of the consideration of alternatives for the design of the Grid Connection Route. However, the consideration of alternatives would need to balance all environmental impacts, engineering feasibility, constructability, and consideration of cost.<br><br>The potential impact on the setting of the buildings has been assessed for the contribution it makes to the cultural significance of the asset. A negative effect on the cultural significance has been identified as part of the assessment. This effect is considered to be less than substantial harm when assessed national planning policy following the methodology set out in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) and as set out within **Planning Statement Appendix E Heritage Statement of Harm** (Doc Ref. 7.1 Rev 1).<br><br>Undergrounding the connector in this location could introduce effects on buried archaeological deposits which contributes to the consideration of alternatives.<br><br>When reviewed in combination across all relevant aspects as part of the alternatives assessment, a 400kV overhead line was taken forward as the preferred option over an underground cable. |

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| | • Alternative options such as undergrounding or rerouting away from sensitive heritage and residential areas have been properly explored; or<br>• The public benefits of overhead infrastructure at this specific location outweigh the identified heritage harm.<br><br>Furthermore, the cumulative impact of visual intrusion from pylons, combined with effects on residential amenity, results in a compounded level of harm that significantly undermines the character and historic integrity of the Weston Marsh area.<br><br>Given the presence of Scheduled Monuments, Listed Buildings, and their sensitive settings, the proposed overhead line and connection point to the electricity network represents an inappropriate and poorly sited form of development, conflicting with established heritage protection principles and place making objectives. | |

## 5.3. CPRE (Campaign for the Protection of Rural England)

5.3.1. Table 5-3 below sets out the Applicant's response to the issues raised within the Relevant Representations from CPRE [RR-033] including signposting to the relevant sections of the DCO Application.

**Table 5-3: CPRE**

| Topic | Matter Raised | Applicant's Response |
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| Topic | The scale of the Meridian Solar Farm is excessive, covering more than 2,700 acres of productive farmland. We are concerned about the loss of high quality agricultural land, the industrialisation of the rural landscape, and the cumulative impact alongside other major energy infrastructure proposed for Lincolnshire.<br><br>Large scale solar farms are not an efficient way of generating renewable energy when the additional infrastructure:- pylon routes, battery storage farms and substations are taken into account. The Government repeatedly claims that brownfield land should be used in the first instance for energy developments. This has not been considered in this application. Other technologies such as SMR reactors can produce a much higher output on a vastly smaller land footprint. Options such as rooftop solar can also be prioritised. Therefore this development is not necessary to reach UK targets. | The UK Government has identified through its energy policy, most recently in the National Policy Statements (NPS) EN-1 and EN-3, 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><br>The landscape and visual effects of the Scheme have been assessed within ES Chapter 12: Landscape and Visual [APP-063]) and its supporting figures and appendices.<br><br>The LVIA concludes that significant residual landscape and visual effects arise principally from the change in land use and the scale of the proposed infrastructure and recognises that these effects cannot be fully mitigated. The Scheme has evolved through a design-led approach in which mitigation has been incorporated where practicable through the iterative design process.<br><br>While the Scheme would result in moderate adverse effects which are significant in relation to the presence of |

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| | | solar infrastructure and hard standing on BMV land, the Applicant has appropriately balanced the use of this agricultural land with other constraints including flood risk and the presence of heritage assets within the Order Limits. The OSMP (Doc Ref. 7.14 Rev 1) provides measures to mitigate the impact on soil resources, and the land can be returned to agricultural use following the decommissioning of the Scheme.<br><br>In terms of the cumulative assessment in **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1), based on previous reporting as part of other NSIPs in Lincolnshire and the extrapolation of available mapping, the proportion of BMV land in the county is estimated to be in the order of 71%. It is estimated that the cumulative impact of solar schemes will account for approximately 3% of all BMV land in Lincolnshire. 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. On this basis, cumulative effects on agricultural land, food production and food security are assessed as not significant.<br><br>The use of alternative locations for solar development, including rooftops and brownfield land, has been considered. Rooftop solar is an important part of the renewable energy mix and the Applicant supports its |

| Topic | Matter Raised | Applicant's Response |
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| | | development on suitable rooftops where practicable. However, rooftop and urban brownfield sites alone cannot deliver the scale of generation required to meet national renewable energy targets, due to technical constraints such as orientation, shading, structural capacity and fragmented land ownership.<br><br>Large scale ground mounted solar developments are therefore an important and necessary component of achieving the UK's solar generation ambitions. The Site has been selected following an assessment of technical, environmental and planning considerations, and the effects of the development have been assessed and mitigated through the Scheme's design and accompanying Environmental Statement. The Scheme has evolved through a design-led approach in which generation capacity has been maximised whilst balancing environmental, social and technical constraints.<br><br>Regarding the use of nuclear, the Applicant would note that Government policy as set out in NPS EN-1 recognises that "a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar" (NPS EN-1, Paragraphs 3.3.19-3.3.20). The Site is unsuitable for nuclear energy, |

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| | | as siting a nuclear power station within Flood Zone 3 would lead to significant safety, policy, and regulatory concerns. Furthermore, the time required and complexity to deploy would delay contribution to the UK's urgent and critical need to decarbonise the energy sector. |

## 5.4. Hub Rural Ltd

5.4.1. Table 5-4 below sets out the Applicant's response to the issues raised within the Relevant Representations from Hub Rural Ltd who represent a number of affected landowners and have submitted the same relevant representation for multiple landowners (see RR-002, RR-026, RR-042, RR-048, RR-054, RR-197, RR-198 and RR-210), including signposting to the relevant sections of the DCO Application.

**Table 5-4: Hub Rural Ltd**

| Topic | Matter Raised | Applicant's Response |
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| Justification of overhead lines as opposed to underground cables. | Underground cables are preferable for a number of reasons, including minimised impact on farming operations in the long-term, reduced blight of the land and reduced visual intrusion for all in the locality. | The Applicant has set out its justification for the use of overhead lines within **ES Chapter 3: Alternatives and Design Evolution** [APP-054], the **Design Approach Document** [APP-268] and the **Planning Statement** [APP-260].<br><br>A guiding principle of the Applicant's design for the transmission infrastructure is the "*government's position that overhead lines should be the strong starting presumption for electricity networks developments in general*" as stipulated within paragraph 2.9.21 of EN-5. This presumption is reversed when a proposed development will cross part of a nationally designated landscape. The Scheme does not cross part of a nationally designated landscape, and therefore this strong starting presumption in favour of overhead lines remains applicable. In any case, **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) considers alternatives in line with paragraph 2.9.14 and 2.9.15 of EN-5 and concludes that an overhead line remains appropriate. |
| Reinstatement of land drainage. | Whilst the Project has failed to so far provide adequate detail on their proposed construction, it is anticipated that land drainage will be severely | Impacts on land drainage are considered within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). |

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| | adversely affected. It is likely that significant reinstatement of land drainage will be required and the Project must provide an undertaking of such. | In addition, the **OCEMP** (Doc Ref. 7.10 Rev 2) sets out a series of measures to ensure existing field drainage functionality is maintained during and after construction. These include:<br>• 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. |
| The land type implicated and the effect on the farming of high- | The locality of the solar farm and proposed pylons is one of the most fertile land areas in the United Kingdom, capable of growing vegetable, salad, root, arable and flower crops. Given that food security is | The impact of the loss of high-quality arable land has been assessed in **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1). Taken in isolation, the Scheme represents less than 1% of the agricultural land available in Lincolnshire. All the infrastructure |

| Topic | Matter Raised | Applicant's Response |
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| quality crops, including taking prime agricultural land out of production permanently. | deemed to be of critical national security, it is deemed unacceptable to be permanently sterilising land which is more capable of feeding the nation than any other in the country. | within the Scheme would be decommissioned. Reinstatement to the baseline ALC grade is proposed for all areas but a conservative approach has been adopted to recovery of areas of hard standing. These have been assessed as if the effect is permanent, but they would be reinstated using stripped and stored topsoil and would not be permanently sterilised. Methods of soil handling are contained within the **OSMP** (Doc Ref. 7.14 Rev 1)<br><br>The cumulative assessment presented in **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 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. Based on previous reporting as part of other NSIPs in Lincolnshire and the extrapolation of available mapping, the proportion of BMV land in the county is estimated to be in the order of 71%. It is estimated that the cumulative impact of solar schemes will account for approximately 3% of all BMV land in Lincolnshire. 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.<br><br>The UK Government Food Security Report, 2024, identifies that the UK is broadly maintaining its level of total utilised agricultural area. UK government expects there to be increases in land use change, including to economic infrastructure, specifying the energy sector as an example. The report indicates that food production levels could be maintained or moderately increased |

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| | | alongside the land use change On this basis, cumulative effects on agricultural land, food production and food security are assessed as not significant.<br><br>As described in the **OSMP** (Doc Ref. 7.14 Rev 1), solar farms can still be used for grazing and support UK farmers to continue food production on other parts of their land. |
| Proximity of pylons and solar farm to residential dwellings. | The proximity of infrastructure to residential dwellings has not been consulted on. The Interested Party has numerous dwellings in the area, all of which will be blighted by the construction process and permanent structures. The Project has not approached the matter of compensation for such blight, which is deemed unacceptable. | In accordance with Sections 42, 47 and 48 of the PA 2008, the Applicant undertook a programme of pre-application consultation prior to submitting its application for development consent. The Applicant is confident in the adequacy of consultation delivered throughout the pre-application phase, as described and evidenced in the Consultation Report [APP-037].<br><br>The key consultation stages included: Non-Statutory Consultation, EIA Scoping, Statutory Consultation, and Targeted Consultation, as detailed in ES Chapter 4: Overview of the EIA Process [APP-055]. Consultations undertaken and responses from the Applicant in landscape and visual matters are contained in Chapter 12: Landscape and Visual [APP-063], Section 12.3 Stakeholder Engagement.<br><br>Principles and design evolution for the Scheme are described in detail within the **Design Approach Document** [APP-268] and summarised from an environmental perspective within **ES Chapter 3: Alternatives and Design Evolution** [APP-054]. From a visual perspective in particular, one design constraint was to maximise the distance of pylons, solar panels, and substations from |

| Topic | Matter Raised | Applicant's Response |
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| | | residential receptors as far as feasible in balance with other environmental constraints, such as designated heritage assets, watercourses, existing vegetation etc.<br><br>There is a limited number of residences in close proximity to the Parcels A-D of the Solar Development Area. As stated in the **Design Approach Document** [APP-268] "*the Scheme ... represents a carefully balanced design that integrates renewable energy generation with landscape character, ecological value, heritage sensitivity and long-term land management. Key features include ... reduced infrastructure heights, refined offsets from residential receptors, the relocation and consolidation of substations and BESS, and a coordinated overhead line (OHL) alignment designed with reference to the Holford Rules and cumulative infrastructure*". Section 4.2 of the **OLEMP** (Doc Ref. 7.16 Rev 1) further outlines and secures buffers from the Scheme's infrastructure to residential receptors.<br><br>The Applicant remains engaged with Affected Person(s) and their agents regarding effects of infrastructure on land required for the Scheme. If a blight claim does arise it will be assessed on the specific circumstances, but this is not a matter for the Examination. |
| Access for construction traffic. | The Project has failed to consult on the matter of construction traffic. Access routes, damage to farmland and detriment to members of the locality will all require consultation and mitigation. | The Applicant notes the stakeholder's concern regarding consultation on construction traffic, access routes and potential effects on surrounding land and local communities.<br><br>The assertion that construction traffic has not been the subject of consultation is incorrect. Traffic and transport matters have been |

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| | | considered throughout the development of the Scheme and have been subject to consultation with the relevant Highway Authorities, including Lincolnshire County Council (LCC), Peterborough City Council (PCC) and National Highways (NH). They have also formed part of the public consultation proposals at various stages of the scheme. The Traffic and Access Study Area, assessment methodology and scope of assessment were discussed through the consultation and scoping process and are documented within **ES Chapter 15** [APP-066].<br><br>The likely effects of construction traffic have been assessed within **ES Chapter 15: Traffic and Access** [APP-066], including the identification of construction traffic routes, forecast traffic movements and potential effects on local communities and highway users. The assessment concluded that, with the proposed mitigation measures in place, the Scheme would not result in significant traffic and transport effects.<br><br>The Applicant has also prepared an OCTMP [APP-278 & APP-279], which includes measures relating to construction traffic routing, a Delivery Management System, workforce travel management, traffic monitoring and stakeholder liaison. These measures are intended to minimise disruption to local communities, protect the operation of the highway network and manage the effects of construction traffic. The OCTMP will form the basis of a detailed Construction Traffic Management Plan to be approved prior to construction commencing and thereafter implemented. |

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| | | In relation to farmland and private land interests, access arrangements and any temporary impacts arising from construction activities will be managed through the detailed design and construction planning process, with appropriate further engagement undertaken with affected landowners and occupiers where relevant. The DCO Application includes a range of management plans through which construction impacts of the Scheme would be managed, including the **OCEMP** (Doc Ref. 7.10 Rev 2) and the **OSMP** (Doc Ref. 7.14 Rev 1) with regards to the impacts on farmland specifically. Impacts on access would be managed in accordance with measures set out within the OCTMP.<br><br>The Applicant therefore considers that construction traffic and other construction impacts have been appropriately assessed and consulted upon to inform the DCO Application and that suitable mechanisms are secured to develop and implement detailed mitigation measures prior to the commencement of construction. |
| Ecological impact. | Excessive and unnecessary damage to ecosystems and habitats is destructive and should be considered prior to undertaking such projects which are driven by the generation of profit for shareholders. | **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) assesses the impact of the Scheme on biodiversity and wildlife. The assessment concludes that no significant adverse effects are expected, with the implementation of mitigation measures set out within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1), **ODEMP** (Doc Ref. 7.12 Rev 1) and the **OLEMP** (Doc Ref. 7.16 Rev 1). Examples of mitigation measures include micro-siting of infrastructure alongside establishing buffers from key habitat features (including but not limited to, woodlands, trees with bat roost potential, watercourses, hedgerows etc), provision of an |

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| | | Ecological Clerk of Works (ECoW) to supervise vegetation clearance where necessary, and sensitive lighting strategy to limit adverse effect on nocturnal species. |

## 5.5. LAND (Lincolnshire Against Needless Destruction)

5.5.1. Table 5-5 below sets out the Applicant's response to the issues raised within the Relevant Representations from LAND (Lincolnshire Against Needless Destruction) [RR-105] including signposting to the relevant sections of the DCO Application.

**Table 5-5: LAND (Lincolnshire Against Needless Destruction**

| Topic | Matter Raised | Applicant's Response |
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| Targeted Consultation | Inadequate and unlawful consultation Targeted consultation on newly added grid-connection land was not publicised, not notified to affected landowners, and did not comply with the SoCC.<br><br>No environmental information was provided for the expanded red-line area, contrary to the Planning Act 2008, EIA Regulations 2017, and DCLG Pre-Application Guidance.<br><br>Consultation was not capable of producing informed responses. | The Applicant's consultation has been undertaken lawfully in accordance with the PA 2008 and applicable guidance, which allows for a bespoke and proportionate approach to further consultation.<br><br>In determining how to consult on the proposed changes, the Applicant had regard to Section 7 of the Statement of Community Consultation (SoCC) which states: "If, following statutory consultation, we consider it is necessary to undertake further localised, targeted or supplementary consultation, this would be undertaken, so far as relevant and proportionate, in accordance with the principles and methods set out in this SoCC."<br><br>The additional targeted consultation focused specifically on a number of localised changes to the Scheme. Given that these changes were localised and related specifically to the grid connection arrangements, the Applicant undertook an additional targeted consultation to seek feedback from those with an interest in the affected land and from relevant stakeholders. This ensured that engagement was appropriate to the scale and nature of those changes. On this basis, the Applicant considers the consultation approach to be |

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| | | appropriate and consistent with relevant legislation and guidance. The Applicant is confident that information made available during the additional targeted consultation was adequate and appropriate for that stage in the process, and that the reasons for each proposed change were sufficiently explained. This included a list of expected effects, similar to those already assessed for the remainder of the grid connection corridor in the PEIR.<br><br>The Applicant also considers that the additional targeted consultation was adequately publicised, with communication directed towards those considered most likely to be affected by or to have a direct interest in the proposed changes, including land interests. Further details of the Applicant's approach and its justification are set out in the **Consultation Report** [APP-037]. |
| Loss of nationally significant agricultural land (BMV Grade 1 silt soils) | The proposal would permanently remove rare, high-value Grade 1 silt soils, critical to UK food security.<br><br>No credible alternatives assessment has been provided, contrary to NPS EN-1, NPPF 174(b) and EIA Regs Schedule 4. | 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 Rev 1). As described within the **ODEMP** (Doc Ref. 7.12 Rev 1) and **ES Chapter 2: The Scheme** [AS-017], and secured through Requirement 21 of the **Draft DCO** (Doc Ref. 3.1 Rev 2), 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 |

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| | | proposed and all infrastructure will be removed, the Scheme does not result in the permanent loss of agricultural land. However, for a worst-case assessment, **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) has considered the potential for permanent land quality downgrading where Grade 1 land (and other BMV land) is used for the construction of the On-site Substations and BESS Compound. As such, **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) acknowledges the potential for a significant effect on Grade 1 land in this regard.<br><br>Whilst the assessment has been undertaken on a worst-case basis, the **OSMP** (Doc Ref. 7.14 Rev 1) includes the aim for soils to be restored to their original grade, where feasible, following the removal of the infrastructure.<br><br>Prior to the start of construction, a detailed SMP will be prepared, submitted to and approved by the local authority and is secured by the **Draft DCO** (Doc Ref. 3.1 Rev 2). This will be in substantial accordance with the **OSMP** (Doc Ref. 7.14 Rev 1).<br><br>In relation to food security, DEFRA's UK Food Security Report 2024 identifies that "*food production levels can be maintained or increased alongside the land use change required to meet our Net Zero and Environment Act targets*". Land use change associated with solar development is not identified as a risk to food security in the UK. |

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| | | Consideration of alternative designs is summarised within the **Design Approach Document** [APP-268], **ES Chapter 3: Alternatives and Design Evolution** [APP-054] and **Appendix D Site Selection Report of the Planning Statement** [APP-264] in full compliance with all policy and legislative requirements. As set out within these documents, all on-site 132kV substations have been located on Grade 3b agricultural land. However, it has not been possible to avoid the use of Grade 1 and Grade 3a BMV land for the siting of the on-site 400kV substation and BESS compound due to environmental and engineering constraints associated with alternative locations. |
| Fragmented grid-connection strategy and cumulative impacts | The grid connection to Weston Marsh Substation is functionally interdependent with the Grimsby–Walpole reinforcement.<br><br>Cumulative impacts with EGL3, EGL4, EGL5, Weston Marsh A/B, and multiple solar NSIPs have not been assessed, contrary to the EIA Regulations.<br><br>The project appears to rely on piecemeal land acquisition and "ghosted" infrastructure not shown in consultation materials. | The concern regarding the development of multiple overhead line projects is acknowledged. The Applicant is continuing to engage with NGET regarding the Grimsby to Walpole and Weston Marsh to East Leicestershire OHLs to limit impacts where practicable. This has been assessed within the cumulative effects section of each technical chapter of the Environmental Statement. Please refer to ES Appendix 4-1 List of Cumulative Schemes [APP-170] for the full list of schemes scoped into the cumulative assessment. This includes EGL3 and EGL4 and Grimsby to Walpole (which includes the proposed Weston Marsh A and B substations). EGL5 is approximately 50km away from the Scheme and therefore falls outside of the 30km study area. All cumulative Nationally Significant Infrastructure Projects (NSIPs) including solar schemes are set out in the long list and short list of ES |

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| | | Appendix 4-1: List of Cumulative Schemes [APP-170], and the list of cumulative schemes was consulted on with LCC and SHDC during the pre-application stage.<br><br>As summarised within Section 6 of **ES Non-Technical Summary** [APP-070], significant cumulative effects have been identified with regards to the change to the setting of adjacent heritage assets and historic landscape from, landscape character and visual amenity, and cumulative construction traffic on A151 Holbeach Road, A16 South of Crowland, A16 North of Peterborough, Hull's Drove (East) (albeit this is largely attributed to the traffic generated by the cumulative schemes).<br><br>The Applicant continues to seek voluntary agreement with Affected Person(s). The majority of Affected Person(s) form part of the LIG and the Applicant has held two meetings to progress negotiations to agree Heads of Terms and negotiations remain ongoing. Where landowners do not wish to engage, the Applicant remains committed to seeking voluntary agreement with them and is following up to see if their position has changed. It is appropriate that the Applicant continues this iterative process of seeking to acquire land by voluntary agreement, in order to reduce the need to rely on compulsory acquisition powers. |
| Flood risk, drainage and IDB concerns | The site lies in a sensitive, low-lying drainage landscape. | **ES Appendix 11-4: Outline Drainage Strategy** [APP-277] has been developed to manage surface water runoff effectively |

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| | No assessment of:<br>• increased surface-water runoff from panel arrays<br>• compaction beneath PV structures<br>• downstream impacts on IDB-managed drains<br>• flood-risk interaction with Weston Marsh Substations<br>No evidence of IDB consent, contrary to the Land Drainage Act 1991. | and ensure there is no increase in flood risk within the Order Limits or in surrounding areas.<br>The impact of construction on soil has been assessed within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1). Measures are included within the **OSMP** (Doc Ref. 7.14 Rev 1) to avoid soil compaction during the construction phase. The Applicant also notes that during operation, there is likely to be an improvement in soil structure due to the period of suspended agricultural activities.<br>The impact of flooding on the Scheme has been assessed within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref 6.1 Rev 1)and **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3 Rev 2). No significant effects are expected.<br>Details of proposed mitigation measures are detailed within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref 6.1 Rev 1), **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3 Rev 2) and **ES Appendix 11-4: Outline Drainage Strategy** [APP-277]. These have been developed through engagement with the Environment Agency.<br>The **Draft DCO** (Doc Ref. 3.1 Rev 2) seeks to disapply relevant Internal Drainage Board byelaws and replace them with appropriate protective provisions contained in Schedule 13 of the Draft DCO. The Applicant is engaging with the relevant Internal Drainage Boards regarding the protections required for their assets and statutory functions. Any consents, |

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| | | approvals or agreements required in relation to the Scheme will be obtained in accordance with the relevant legislative and regulatory requirements.<br><br>It is usual under the Protective Provisions for the undertaker to submit plans of specified work to the drainage authority, and these would be approved in writing by the drainage authority prior to works taking place. Therefore, all future works to SHIDB assets would be approved by the SHIDB. |
| Landscape, heritage and rural character harm | The scale of the solar array will industrialise open fenland and harm long views.<br><br>No assessment of setting impacts on heritage assets or historic landscape character. | **ES Chapter 12: Landscape and Visual** [APP-063] and the supporting figures and appendices provide Applicant's assessment of the Scheme on landscape and visual receptors. The assessment acknowledges that some significant adverse effects on landscape and visual receptors are inevitable and that the Scheme will introduce industrial elements into the landscape, which may be visible at a long distance due to the openness of the existing landscape.<br><br>**ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) section 8.9 provides an assessment of the potential for physical impacts of the Scheme on the significance of recorded and unrecorded heritage assets within the Site and the impacts on the significance of heritage assets as a result of changes to their setting. This includes buried archaeological deposits, built heritage and historic landscapes. The assessment is supported by **ES Appendix 8-4: Summary of Heritage Setting Assessment** (Doc Ref. 6.3 Rev 1). The assessment |

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| | | acknowledges that significant effects would occur as a result of a change to the setting of adjacent heritage assets and the historic landscape character.<br><br>The Applicant considers that a reasonable, proportionate and consistent approach has been taken, guided by national and local guidance including Guidelines for Landscape and Visual Assessment, 3rd edition (GLVIA3) and Historic England's Historic Environment Good Practice Advice in Planning. Note 3: The Setting of Heritage Assets. |
| Ecological and ornithological impacts | Insufficient information on:<br>• habitat loss<br>• protected species<br>• migratory bird collision risk<br>• glint/glare effects on birds and aviation<br>• cumulative ecological impacts with other NSIPs. | The impact of the Scheme on wildlife has been assessed within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) and **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref. 6.3 Rev 1), including consideration of habitat loss, disturbance and species interactions, as relevant. Bird diverters have been specified on sections of the Grid Connection Route to minimize the risk of bird collisions with the overhead line, as set out within the **Design Parameters** (Doc Ref. 7.4 Rev 2) and the **OOEMP** (Doc Ref. 7.11 Rev 1). Subject to the implementation of the specified mitigation measures, the assessment concludes that no significant effects on ecology or biodiversity are expected.<br><br>Cumulative ecological impacts with other NSIPs are assessed in section 9.10 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1). |

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| | | The Applicant confirms that Crowland Airfield and Fenland Airfield have been considered in **ES Chapter 16: Other Environmental Topics** [APP-067] within both the Glint and Glare and Major Accidents and Disasters sections. The chapter concludes that effects upon the runway approach paths to both airfields from the Scheme would be low and acceptable (not significant). Suitable buffers have been incorporated into the Scheme design to ensure infrastructure is outside a theoretical Obstacle Limited Surface of the airfields, and therefore not impact on the operation of the airfield.<br><br>Solar PV panels are designed to absorb, not reflect, irradiation. A general consensus in relevant studies is that there is potential for glint and glare from PV panels to cause a hazard or nuisance for surrounding receptors including birds, but that the intensity of such reflections is similar to that emanating from still water. A full assessment of glint and glare from the Scheme is provided in **ES Appendix 16-2: Glint and Glare Assessment** [APP-255 to APP-257]. |
| Traffic, construction and community impacts | No cumulative traffic modelling.<br><br>Narrow rural roads unsuitable for HGVs and AILs. | The Applicant disagrees with the assertion that cumulative traffic modelling has not been undertaken. A cumulative traffic assessment has been completed for the Scheme and is reported within **ES Chapter 15: Traffic and Access** [APP-066] and **ES Appendix 15-6: Cumulative Schemes Traffic Flows** [APP-253]. The assessment considers relevant cumulative developments (from a list previously agreed with the Local |

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| | | Authorities) and concludes that significant cumulative construction traffic may occur on A151 Holbeach Road, A16 South of Crowland, A16 North of Peterborough, Hull's Drove (East) in the worst-case scenario, where all peak traffic flows overlap (albeit this is largely attributed to the traffic generated by the cumulative schemes).<br><br>The Applicant acknowledges that several roads within the Scheme area are rural in nature. The suitability of the highway network for construction traffic, including Heavy Goods Vehicles (HGVs) and Abnormal Indivisible Loads (AILs), has been assessed as part of **ES Chapter 15** [APP-066]. The Applicant has given detailed consideration to narrow rural roads, passing opportunities, traffic routing, timing, access arrangements and the need for temporary passing places during the construction, operational and decommissioning phases of the Scheme.<br><br>The **OCTMP** [APP-278 and APP-279] sets out requirements for road condition surveys to be undertaken before, during and following construction on roads directly serving the Scheme and routes used by HGVs and AILs. Where these surveys identify construction-related effects, appropriate works will be undertaken. The proposed construction traffic routes are shown within **ES Figure 15-3: Heavy Goods Vehicle (HGV) Routing** [APP-161] and **ES Figure 15-4: Abnormal Indivisible Load (AIL) Routing** [APP-162]. |

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| | | In addition, the Applicant is in the process of developing a Temporary Passing Place Strategy and will continue to engage with the relevant highway authorities regarding access arrangements and any additional mitigation measures considered necessary to facilitate the safe movement of construction traffic whilst minimising effects on local residents, businesses and road users.<br><br>The Applicant therefore considers that cumulative traffic effects and the suitability of the local road network have been robustly assessed and that appropriate mitigation and management measures have been identified to ensure HGV and AIL movements can be accommodated safely during construction. |
| Significant impacts on local amenity, wellbeing, tourism and from workforce accommodation. | Significant impacts on local amenity, wellbeing, and tourism.<br><br>Workforce accommodation pressures not assessed. | Paragraphs 14.8.25 to 14.8.31 of **ES Chapter 14: Socio-Economics and Land Use** [APP-065] include an assessment of potential effects on tourism arising from the Scheme comprising consideration of impacts on local accommodation facilities, recreational receptors and visitor attractions. The assessment acknowledges that tourism makes a notable contribution to the region's economy and that there are a number of facilities and businesses which attract tourists in the local area. On the basis that there are no direct land take impacts from tourism receptors and no impacts on severance of access are expected, it was concluded that overall, the effect of the Scheme on tourism would be not significant |

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| | | during the construction, operation, and decommissioning phases.<br><br>Paragraphs 14.8.16 to 14.8.21 of **ES Chapter 14: Socio-Economics and Land Use** [APP-065] include an assessment of potential effects on local accommodation supply within a 60-minute Drive Time from the Scheme during construction. As shown in Table 14-22, supply would be sufficient to accommodate the temporary workforce required to construct the Scheme, accounting for typical seasonal demand. This includes consideration of a worst-case scenario whereby all workers residing outside the 60-minute study area would require use of visitor accommodation. Accordingly, it was concluded that there would be no significant effects on local accommodation supply during the construction phase of the Scheme.<br><br>**ES Chapter 10: Human Health** [APP-061] assesses potential effects of the Scheme on 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 both amenity and wellbeing. 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 wellbeing (for example associated with air pollution and access to healthcare facilities). No significant adverse |

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| | | effects are identified with regards to human health or wellbeing.<br><br>Impacts relating to local amenity have also been considered in **ES Chapter 10: Human Health** [APP-061] through health determinants such as noise and vibration; air quality, odour and dust; landscape and visual effects; and traffic and access, drawing on assessments presented in relevant ES chapters including **ES Chapter 13: Noise and Vibration** [APP-064], **ES Chapter 6: Air Quality** [APP-057], **ES Chapter 12: Landscape and Visual** [APP-063] and **ES Chapter 15: Traffic and Access** [APP-066]. The noise and vibration, air quality, and traffic and access assessments of relevance to local amenity conclude that there would be no likely significant effects on any receptors across the study area, with any impact on health and wellbeing therefore being very limited if at all experienced. The landscape and visual assessment identifies a number of significant effects on local receptors, however, while changes to landscape character and visual amenity may be perceptible, these effects will reduce over time as mitigation secured within the **OLEMP** (Doc Ref. 7.16 Rev 1) establishes and, in any event, are limited in nature, extent and duration and are not of a scale, frequency or magnitude that would give rise to likely significant adverse effects on health and wellbeing at a population level. Overall, the assessment concluded that there would be no significant health and wellbeing effects |

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| | | arising in relation to amenity as a result of construction, operation, or decommissioning of the Scheme. |
| Need for the Scheme | Need case, alternatives and national policy conflict No robust justification for using prime farmland when brownfield, rooftop, car-park and reservoir-based solar alternatives exist.<br><br>The proposal conflicts with NPS EN-1, EN-3, and the 2026 EN-5 requirement for coordinated network planning.<br><br>The project appears driven by commercial export ambitions rather than local or national need. | The use of alternative locations for solar development, including rooftops and brownfield land, has been considered. Rooftop solar is an important part of the renewable energy mix and the Applicant supports its development on suitable rooftops where practicable. However, rooftop and urban brownfield sites alone cannot deliver the scale of generation required to meet national renewable energy targets, due to technical constraints such as orientation, shading, structural capacity and fragmented land ownership.<br><br>Large scale ground mounted solar developments are therefore an important and necessary component of achieving the UK's solar generation ambitions. The Site has been selected following an assessment of technical, environmental and planning considerations, and the effects of the development have been assessed and mitigated through the Scheme's design and accompanying Environmental Statement.<br><br>The Applicant disagrees that the Scheme conflicts with EN-1, EN-3 and EN-5. All three NPSs recognise the urgent need for low carbon energy projects and new electricity network infrastructure. |
| Decommissioning | Decommissioning uncertainty No credible plan for end-of-life restoration, soil recovery, or removal of degraded PV materials. | The undertaker is legally obliged to decommission the Scheme no later than 40 years following the date of final decommissioning pursuant to Requirement 21 of the **Draft** |

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| | Risk of long-term land sterilisation. | **DCO** (Doc Ref. 3.1 Rev 2). Requirement 21 further provides that decommissioning must be undertaken in accordance with an approved Decommissioning Environmental Management Plan, which must be prepared substantially in accordance with the **Outline DEMP** [APP-277]. This provides details of measures that would be implemented as part of decommissioning of the Scheme to ensure environmental impacts across the Scheme are managed and mitigated as far as practicable. Failure to comply with the terms of a DCO is a criminal offence.<br><br>Good practice environmental management measures to prevent or reduce damage to soils have been set out within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1). 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.<br><br>The **OSMP** (Doc Ref. 7.14 Rev 1), outlines a comprehensive set of measures across the lifetime of the Scheme for the preservation of the soil resource within the Order Limits, avoiding both the loss of soil material from the Order Limits and the loss of soil functional capacity for soil retained within the Order Limits. The **OSMP** (Doc Ref. 7.14 Rev 1) establishes the aim for all land to be restored to its original grade, where feasible. |

## 5.6. Lincolnshire Wildlife Trust

5.6.1. Table 5-6 below sets out the Applicant's response to the issues raised within the Relevant Representations from the Lincolnshire Wildlife [RR-112] including signposting to the relevant sections of the DCO Application.

**Table 5-6: Lincolnshire Wildlife Trust**

| Topic | Matter Raised | Applicant's Response |
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| Impacts on LWS | Two local wildlife sites (LWS) lie within the PV area, Sly's Connection and South Holland Main Drain West. Policy 28 of the South East Lincolnshire Local Plan states:<br><br>"2. Nationally or locally-designated sites and protected or priority habitats and species: a. development proposals that would directly or indirectly adversely affect these assets will not be permitted unless:<br><br>i. there are no alternative sites that would cause less or no harm; and<br><br>ii. the benefits of the development at the proposed site, clearly outweigh the adverse impacts on the features of the site and the wider network of natural habitats; and<br><br>iii. suitable prevention, mitigation and compensation measures are provided." | There are no watercourse crossings proposed across Sly's Connection LWS or any other direct works within this LWS. However, works are proposed to an existing bridge crossing across the South Holland Main Drain West LWS, which may comprise upgrades to the existing bridge or its replacement. These works will be required to provide an access track. Whilst the exact design of the crossing will be determined at the detailed design stage, the design parameters used for assessment are set out in Table 2-.1 of ES Chapter 2: The Scheme [AS-017].<br><br>Measures to minimise impacts on the LWS are set out within the **OCEMP** (Doc Ref. 7.10 Rev 2), including (but not limited to) specification of stand-offs (typically 10 m), where reasonably practicable, fenced buffers, bank protection, sediment/pollution control, dust control, trenchless techniques at sensitive reaches and pre-works checks. With these measures in place, **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) concludes that the residual effect on the Sly's Connection and South Holland Main Drain West LWSs is minor adverse (not significant). |

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| | This makes it clear that development should not have any negative impacts on locally-designated sites, such as LWSs. | |
| Impacts on water vole and otter | A species of concern for both above LWSs is water vole, with burrows noted on the LWS citation for South Holland Main Drain. A water vole was sighted near crossing point GC-03 during the 2025 bird survey, within the South Holland Main Drain West LWS. Water vole presence was also noted for Sly's Cut LWS, with the 2024 surveys finding one water vole burrow within the LWS, at crossing point D_N.2.2, and the 2024 surveys finding two burrows within the LWS, near crossing point PV-D-05. A water vole was also observed during the 2024 bird surveys at crossing point D_N3.3, within Lambert Drain which is directly connected to Sly's Cut LWS.<br><br>Otters are also likely to be present within the LWSs. During the 2023 breeding bird survey, an otter spraint was seen at crossing point GC-03, located within the South Holland Main Drain West LWS. In the 2025 water vole and otter survey, an otter spraint was found at crossing point PV-D-13, outside of but directly connected to this LWS. The report states that "This indicates a permanent presence along South Holland Main Drain, which is supported by desk study records." Water vole and otter are both priority | Pre-construction surveys for water vole and otter are also to be undertaken as secured through the **OCEMP** (Doc Ref 7.10 Rev 2) and appropriate protected species licenses to be applied for from Natural England prior to the works being undertaken to ensure appropriate mitigation. With these measures in place, **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) concludes that the residual effect on water vole and otter is minor adverse (not significant).<br><br>Natural England have agreed the assessment approach and have raised no further comments in their relevant representation [RR-112] with regards to the assessment of impacts on water voles and otter.<br><br>The Applicant notes Natural England's relevant representation [RR-112] response in respect of otters which states that although the River Welland and South Holland Main Drain are identified as part of otter territories, Natural England agrees with the Applicant's assessment that a likely significant effect on this species as a result of impacts to functionally linked land can be ruled out. Further, Natural England state that the Scheme design has ensured there is no direct loss of key functionally linked habitats along these watercourses, and embedded measures, such as those set out in Table 3-5 of the |

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| | species listed on the Species and Habitats of Principle Importance List published under section 41 of the Natural Environment and Rural Communities (NERC) act. Paragraph 192 of the National Planning Policy Framework states that: "To protect and enhance biodiversity and geodiversity, plans should [...] promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species". Where water vole and otter are likely to be present within the LWS, works such as crossing points should be avoided. There are several crossing points that are yet to be surveyed for water voles and otters, as access could not be obtained from landowners. These areas should be surveyed before a development consent order is granted, as well as updated surveys from within 12 months of works commencing. | **OCEMP** (Doc Ref. 7.10 Rev 2) for otter and water vole, are likely to avoid any significant disturbance to the species. These include buffering of watercourses, avoidance of night works and pre-construction surveys.<br><br>As noted above, pre-construction surveys will be undertaken for both water vole and otter to inform current (at that time) licensing requirements prior to construction.<br><br>Water vole licensing is known to be necessary, the specifics of which (CL 31 Displacement licence) has been agreed with Natural England. The updated species surveys will confirm current (at that time) requirements of the licencing.<br><br>The Applicant notes Lincolnshire Wildlife Trust's request that the locations not previously surveyed for water vole and otter are surveyed prior to the grant of development consent. However, the Applicant does not consider further surveys prior to the grant of development consent to be necessary, as the requirement for protected species licences is already recognised and agreed with Natural England. Furthermore, the purpose of the pre-construction surveys, as mentioned above, is to ensure mitigation during the construction phase is based on the latest species information. Should there have been any changes to Otter or Water Vole distribution within the Order Limits, mitigation measures, where required, will be updated accordingly, ensuring that any presence of protected species is appropriately managed at the time works are carried out. |

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| Impacts on whooper swan | Whooper swan is listed as a Part I Schedule 1 species within the Wildlife and Countryside Act 1981, and is an amber listed bird of conservation concern. In the 2023-24 wintering bird survey, 250 whooper swan were seen in one of the transects covering section D of the PV area in November 2023, which is predicted to make up 25% of the county wintering population. Numbers are considered to be of national significance when they exceed 1% of the UK winter population, which is listed as 20,000 whooper swans by the BTO, meaning that the numbers on site exceeded the 1% threshold of 200. Although these numbers were not reached on other surveys, the fact that a peak count of 250 was recorded indicates the area could be important for the species, and suggests the possibility of it being functionally linked land for designated sites; for example, the Ouse Washes Special Protected Area (SPA) is located about 28 km southeast of the PV area, and lists whooper swan as a qualifying feature. Additionally, although whooper swan are not a qualifying feature of the Nene Washes SPA, located about 13 km south of the site, they are still listed on the citation for the designation. Compared to the 5-year average count for the Nene Washes, a count of 250 whooper swans on site is around 13%. This suggests that the solar array and associated overhead lines could negatively impact a significant whooper | The following measures have been established within the DCO Application to minimise impacts on whooper swan:<br>• Measures set out within the **OCEMP** (Doc Ref. 7.10 Rev 2), including updates provided at Deadline 1, with regards to minimising disturbance during the construction works such as high-noise works within 1,100m of FLL areas during the wintering and migratory bird season (September to March) and visual screening will be installed between FLL areas and worksites located within 600m to minimise visual disturbance to birds.<br>• Measures set out within **OLEMP** (Doc Ref. 7.16 Rev 1) with regards to habitat management areas, species monitoring and adaptive management responsibilities. This specifically applies to the areas between the Order Limits and the River Welland, where higher numbers of whooper swans were recorded.<br>• Avoiding works in key areas currently used by whooper swans is a key form of embedded mitigation, which has been used to inform the routing of Grid Connection, as set out within **ES Appendix 9-14: Habitats Regulations Assessment** (Doc Ref. 6.3 Rev 1).<br>• Bird flight diverters including night-visible types, where appropriate, have been incorporated within the Scheme design where potential for collision risk |

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| | swan population, both in terms of loss of foraging habitat and potential mortality from collision. The 2023-24 Wintering Bird Survey Report states that "Given the features within the PV Area that are relevant to the IIWS, and the nationally important population of whooper swan (it is likely that the birds are moving east / west across the site and commuting from the Nene Washes to the south of the Study Area.) Work in these areas should be avoided to minimise and / or avoid impacts." Despite this, there is little detail in the Outline Construction Environmental Management Plan (OCEMP) or Outline Landscape and Ecology Management Plan (OLEMP) to describe how impacts on this nationally significant habitat for whooper swan. | has been identified for whooper swans, and secured via the **Design Parameters** (Doc Ref. 7.4 Rev 2) and the **OOEMP** (Doc Ref 7.11 Rev 1).<br>Impacts on whooper swan have been assessed within **ES Appendix 9-14: Habitats Regulations Assessment** (Doc Ref. 6.3 Rev 1) as part of the SPA bird assemblage. With mitigation measures in place, as summarised above, no significant effects are considered likely. |
| Impacts on other wintering birds | In addition to whooper swans, the 2023-24 wintering bird survey observed counts of at least county importance for gadwall, lapwing, pintail, teal, and wigeon. These were located on periodically flooded land adjacent to the river Welland. With the exception of lapwing, all of these species are a qualifying features of the Nene Washes SPA, and are amber listed birds of conservation concern. The report also states that the area is likely to be functionally linked to the Nene Washes SPA. Lapwing are red listed birds of conservation concern, and are additionally priority | Seasonally flooded land, used by wintering birds, falls outside the construction footprint and the Order Limits but measures to protect and minimise disturbance have been secured through the **OCEMP** (Doc Ref. 7.10 Rev 2). The proposed mitigation measures include scheduling vegetation clearance outside the bird nesting season (March to September) where practicable, or undertaking nesting bird checks immediately prior to works where this is not possible. Additionally, night-time working near flooded fields and drains will be avoided where practicable, and lighting at compounds located near |

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| | species listed on the Species and Habitats of Principle Importance List published under section 41 of the NERC act. The areas between the river Welland and the PV area are mapped on Defra's Multi-Agency Geographic Information for the Countryside (MAGIC) map as coastal floodplain grazing marsh, a priority habitat listed on the Species and Habitats of Principle Importance List published under section 41 of the Natural Environment and Rural Communities (NERC) act. It is not clear from the report whether the bird counts of county significance are located within the PV area itself, or on the coastal floodplain grazing marsh just outside of the works boundary. Either way, this area is clearly an important for wetland birds, and functionally linked to the Nene Washes SPA, so care should be taken to protect and enhance this habitat. More details of how this will be done should be included in the Landscape and Ecology Management Plan (LEMP). | sensitive riparian habitats and wintering bird areas will be minimised.<br><br>The Applicant has updated **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref. 6.3 Rev 1) for Deadline 1 to include further clarification of the identification of areas classed as Functionally Linked Land (FLL). In addition, the Applicant has updated the **OCEMP** (Doc Ref. 7.10 Rev 2) to clarify measures specifically relevant to minimise impacts on FLL. These measures are outlined in row 1.3 of this table.<br><br>Habitat management areas have also been set aside and species monitoring and adaptive management responsibilities secured through the **OLEMP** (Doc Ref 7.16 Rev 1). |
| Bird flight diverters for golden plover | We are pleased to see bird flight diverters included in the plans for the grid connection route. Golden plover, which are a designated feature of The Wash Ramsar site, were observed during the 2023-24 vantage point surveys flying within the 50-75 m collision risk zone. Although some of the areas observed to be utilised by golden plover are planned to have flight diverters, the | The early Vantage Point surveys (**ES Appendix 9-6: Grid Connection Route Wintering Bird Survey Report 2023 – 2024** (Doc Ref. 6.3 Rev 1)) recorded occasional golden plover to the east of Weston Hills (including one flock of 300), but these were significantly fewer than those recorded to the west of the Grid Connection Route, south of Weston Hills, |

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| | stretch of the grid connection north of Weston Hills is not planned to use diverters, despite golden plover using this area. We request that the proposed line marker spans are extended to cover this area. | where bird diverters are proposed, as shown on **ES Figure 9-6** [APP-104].<br><br>Sighting to the east of Weston Hills were also further away from the Grid Connection Route and flights across the route westward would be directly toward Lower Fulney and Spalding, so would not be likely frequent flight routes and birds flying between these two locations would cross the route where the diverters are proposed.<br><br>The survey evidence does not indicate a likely significant collision risk in areas other than those identified for diverters, and therefore does not support any need to increase the proposed extent. The **OOEMP** (Doc Ref. 7.11 Rev 1) outlines proposed post-installation incident logging . |
| Skylarks | Skylarks have experienced rapid population declines in recent years, and are a red listed species of European conservation concern. Additionally, they are a priority species listed on the Species and Habitats of Principle Importance List. For policy surrounding priority species we refer back to Policy 28 point 2 of the South East Lincolnshire Plan, and paragraph 192 of the National Planning Policy Framework, as quoted above. Any development should therefore ensure the protection of this key species. The 2023-24 Wintering Bird Survey Report shows that a peak count of 70 skylarks were observed on site during the wintering | As set out within the **OLEMP** (Doc Ref. 7.16 Rev 1), the following detail will be provided within the Farmland Bird Mitigation Strategy post DCO-consent:<br><br>• operational stage skylark territory surveys will be completed in years 1, 2 and 5 and would be compared to the existing baseline;<br><br>• peak counts of singing skylark totalled 95 across the Site, which is estimated to represent around half that number of territories taking account of repeat observations and unsuccessful territories, which would be approximately 50 territories. |

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| | bird survey, with the Breeding Bird Survey Report finding a total peak count of 100 singing skylarks across the transects. The report does not estimate the number of skylark territories on site, but does conclude that they are probable breeders across all transects. Skylarks are ground nesting birds that require unbroken lines of site from their nests in order to avoid predation, and there is currently no clear evidence of skylark territories on existing solar farms. Due to the sheer volume of solar farm developments being applied for across Greater Lincolnshire including NSIPs, Lincolnshire Wildlife Trust believes that cumulatively there is true potential to impact populations in Greater Lincolnshire. We are pleased to see that a Farmland Bird Mitigation Strategy has been proposed, but would like to see further details on the number of skylark territories currently impacted by the development, and how many of these will be offset by the mitigation area. | • the Scheme is providing 151.8ha of arable land with skylark plots and 129ha species-rich grassland, a total of 280.8ha. This is equivalent to around 0.2 territories per hectare, which is the within the range of expected carrying capacity for good quality habitat. With this mitigation in place, effects are unlikely to be significant, even in combination with other schemes.<br>• Adaptive management would occur if targets not met. |
| Habitat surveys | Following the extension of the order limits for the grid connection route, habitat surveys of the new area have only been conducted from the road. The Preliminary Ecological Appraisal Report states that "The survey is considered sufficient for the purposes of informing the DCO Application". We disagree with this, and stress the importance of conducting | The Applicant maintains that the assessment of that part of the Order Limits which was extended to allow the Grid Connection Route to connect to the Weston Marsh B substation is sufficient for the purposes of informing the DCO Application for the following reasons:<br>• NGET Preliminary Ecological Appraisal (PEA) data and bird survey data for the Grimsby to Walpole DCO |

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| | thorough surveys prior to receiving DCO, in order to inform the measures necessary to avoid and mitigate impacts on the environment. In addition, vantage point bird surveys are yet to be conducted for the extended grid connection route. With this extended area being even closer to The Wash SPA, there is further importance for these surveys to be conducted to determine the impact of the overhead lines on birds. | project[55] have been used to supplement the assessment in addition to the walkover survey completed for the Scheme. This data was received in GIS format from NGET and it informed the preparation of habitat mapping shown on **ES Figure 9-3** [APP-100]. The data received from NGET covered the entirety of the extended part of the Order Limits, as the Grimsby to Walpole and WMEL projects propose works in the same fields as the Scheme.<br>• As demonstrated by the walkover survey undertaken for the Scheme, this extended area is homogenous with the wider surrounds given its arable nature.<br>• It is also noted that this part of the Order Limits would be subject to the construction of the Weston Marsh B Substation and the overhead line works associated with the Grimsby to Walpole and WMEL schemes, prior to the construction of the Scheme. As such, within the future baseline, these may have already removed or disturbed existing habitats, protected and notable species, where present. However, in order to ensure a worst-case assessment, the assessment assumes a baseline of no disturbance as a result of cumulative |

[55] NGET (2025) Supplementary Preliminary Environmental Information Report: Section 5 New Weston Marsh Substations A and B. Appendix 4A Bird Survey Data 2022-24. Available at: https://www.nationalgrid.com/document/565626/download [Accessed 15/08/2026]

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| | | schemes, so that all potential effects of the Scheme are considered. As such, the assessment presented within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) adopts a precautionary approach, where no disturbance to existing baseline is assumed.<br>• The **OCEMP** (Doc Ref. 7.10 Rev 2) commits to further pre-construction surveys, with any resultant actions and mitigation to be incorporated within the detailed CEMP. |
| Biodiversity Net Gain | The Biodiversity Net Gain Report states that "All habitats are proposed to reach a 'poor' target condition, with the exception of other neutral grassland, which is expected to reach 'moderate' condition." However, in Appendix 3: Habitat Condition Assessment for Baseline and Post Development Habitats, many habitat parcels are listed as being moderate condition modified grassland post-development. It is not clear what condition is proposed for the area under the solar panels, but it is unrealistic for this shaded area to reach any higher than poor condition. Additionally, the area lost to the support structures of the solar panels should be accounted for within the metric calculations. | The statement of 'moderate' condition in Appendix 3 of the **Biodiversity Net Gain (BNG) Report** [APP-274] was an error, and it is confirmed that the metric has assumed 'poor' condition, including grassland under and around the solar panels. This has been corrected within the **BNG Report** (Doc Ref. 7.9 Rev 1) submitted at Deadline 1.<br>For the structure supports, a 5% loss has been applied to account for the loss associated with the pylon footprints. In addition, the **BNG Report** (Doc Ref. 7.9 Rev 1) has been updated to include a separate 5% loss for the solar panel mounting structures.<br>The updates made to the BNG calculations do not impact on the Scheme's commitment to deliver 10% BNG for habitat area units, 400% for hedgerow units and 10% for watercourse units, as secured through Requirement 8 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). |

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| OLEMP | The OLEMP lists various strategies for avoiding and mitigating harm to habitats and species during the development, however these are frequently followed by phrases such as "where reasonably practicable". We would like to see stronger commitments to avoidance and mitigation measures in the full LEMP, and a clearer plan of when these methods will be used, and where they are considered not reasonably practicable. | The Applicant has reviewed the use of the phrase 'where reasonably practicable' within the **OLEMP** (Doc Ref. 7.16 Rev 1). The phrase is used 9 times across the document, in the following instances:<br>• Paragraph 1.2.2 - The Scheme has been designed, where reasonably practicable, to avoid or reduce effects on landscape/visual and biodiversity features through siting of the Scheme components, including structures and new planting;<br>• Paragraph 1.3.1 - The overarching objectives of the OLEMP are to: • Integrate the Scheme into its landscape setting and avoid or minimise adverse landscape, biodiversity, heritage, and visual effects, where reasonably practicable;<br>• Paragraph 4.3.1 - The overall objective of the landscape design is to integrate the Scheme into its landscape setting and avoid or minimise adverse landscape and visual effects, where reasonably practicable. Accordingly, the landscape design aims to achieve the following: • To integrate the Scheme into the existing landscape pattern where reasonably practicable by utilising and following existing features, including vegetation, where practicable.<br>• Paragraph 4.2.12 - A minimum offset of 5-10m from existing vegetation boundaries (trees and shrubs) has been incorporated, where reasonably practicable. |

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| | | • Paragraph 4.3.1 - The Scheme has been designed to avoid the temporary or permanent loss of notable habitats (see Section 3.2 above), where reasonably practicable and will be constructed predominantly within arable habitats.<br>• Paragraph 4.3.5 - Commitments embedded within the Scheme design that will contribute to the avoidance of and/ or reduction of potential effects on biodiversity include: • Retention of, and minimising loss of ditches, hedgerows, trees and field edge habitats where reasonably practicable;<br>• Paragraph 5.6.6 - • Species would be of local provenance and, where reasonably practicable, the mix would contain species listed in the local BAP; • Receiving soils will be prepared to reduce nutrients where reasonably practicable This could include spraying with a herbicide to remove existing material and incorporating a substrate to reduce nutrient levels or removing topsoil to expose the sub-soil.<br>In all of the above instances, the use of the term 'where reasonably practicable' is considered appropriate. It is not possible for the Scheme to have no effects at all and in many cases the term relates to areas where flexibility is required for detailed design. Where effects do occur, further measures to minimise and compensate for this are set out within the **OCEMP** (Doc Ref. 7.10 Rev 2) and the **OLEMP** (Doc Ref. 7.16 Rev 1). |

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| | | The outline management plans are intended to provide a framework for the implementation of management and mitigation measures, reflecting the fact that detailed design and construction methodologies would be confirmed post-DCO consent. This flexibility ensures that the measures can be appropriately applied following the completion of pre-construction surveys, detailed design and the confirmation of detailed construction methodologies. Where a firm commitment or a mitigation requirement has been specified within the Environmental Statement, such qualifying phrases have not been used in the outline management plans. However, in other cases, flexibility is required the tailoring of mitigation to the context of the Site and design requirements of the Scheme, and to ensure expedient design and construction of the Scheme. |

## 5.7. Meridian Action Group (MAG)

5.7.1. Table 5-7 below sets out the Applicant's response to the issues raised within the Relevant Representations from the Meridian Action Group [RR-123] including signposting to the relevant sections of the DCO Application.

**Table 5-7: Meridian Action Group (MAG)**

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| Objection | We recognise the impact and challenges of climate change but oppose the Meridian Solar scheme due to its scale, location on prime agricultural land and the impact on the local community.<br><br>Solar farms are not the only way of maximising solar energy. Rooftop solar on the roofs of public buildings, factories and warehouses, car parks and residential developments are significantly under-utilised. Together with promoting the reduction of the use of electricity, roof top energy presents an alternative to the mass expansion of solar farms with the threat of industrialisation to the rural countryside and communities. We recognise the Government's recent announcement that solar roofing will be made compulsory. This is welcomed but it is not soon enough and does not have sufficient scope and scale. Other potential locations for solar include industrial and contaminated land as well as brownfield sites.<br><br>Our objection to the proposed solar farm has its focus on three main themes: loss of BMV land and | The Applicant acknowledges that MAG recognises the impact and challenges of climate change. The Applicant has considered a full suite of environmental constraints, including ALC grade when considering where to site infrastructure within the Scheme layout. 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 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 Rev 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 Rev 1). Further information is provided within **ES Chapter 3: Alternatives and Design Evolution** [APP-054].<br><br>The use of alternative locations for solar development, including rooftops and brownfield land, has been considered, |

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| | the consequent threat to food security the impact on the local community impact on already poor infrastructure<br><br>Together this amounts to industrialisation of the rural countryside. These issues are covered in greater detail in the body of the response | as set out within **Appendix D: Site Selection Report of the Planning Statement** [APP-264].<br><br>Rooftop solar is an important part of the renewable energy mix and the Applicant supports its development on suitable rooftops where practicable.<br><br>However, rooftop and urban brownfield sites alone cannot deliver the scale of generation required to meet national renewable energy targets, due to technical constraints such as orientation, shading, structural capacity and fragmented land ownership. Many brownfield sites are also more appropriately reserved for housing, employment or other forms of development in accordance with national planning objectives.<br><br>Large-scale ground-mounted solar developments are therefore an important and necessary component of achieving the UK's solar generation ambitions. The Site has been selected following an assessment of technical, environmental and planning considerations, and the effects of the Scheme have been assessed and mitigated through the scheme design and accompanying Environmental Statement.<br><br>Impacts on surrounding residents and businesses during construction, operation and decommissioning have been considered in the following technical chapters of the ES: |

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| | | ES Chapter 6: Air Quality [APP-057];<br><br>ES Chapter 10: Human Health [APP-061];<br><br>ES Chapter 12: Landscape and Visual [APP-063];<br><br>ES Chapter 13: Noise and Vibration [APP-064];<br><br>ES Chapter 14: Socio-economics and Land Use [APP-065];<br><br>ES Chapter 15: Traffic and Access [APP-066]; and<br><br>ES Chapter 17: Effect Interactions [APP-068].<br><br>These chapters also consider cumulative effects with other projects within the study area. Measures have been set out within the OCEMP (Doc Ref. 7.10 Rev 2), OOEMP (Doc Ref. 7.11 Rev 1), ODEMP (Doc Ref. 7.12 Rev 1) and oCTMP [APP-278] which would limit disruption to the local community, as far as practicable.<br><br>Furthermore, the Applicant considers that the Scheme will provide a number of benefits to the local community, including:<br><br>- Provision of local employment, apprenticeships, skills training, supply chain opportunities and increased spend in the local area;<br><br>- Provision of a Community Benefit Fund over the lifetime of the Scheme to invest in local projects; |

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| | | - Provision of a permissive path connecting Public Rights of Way between Queens Bank and Shepeau Stow, following the boundary of the Settlement W of Cate's Cove Corner Scheduled Monument ;<br><br>- Provision of biodiversity net gain, as set out within the Biodiversity Net Gain Report (Doc Ref. 7.9 Rev 1). |
| Loss Of BMV Land and the Consequent Threat to Food Security | Our main objection to the proposed Scheme is the use of prime agricultural land recognised as Best and Most Versatile (BMV) for solar energy development. The land in South Holland is recognised as having some of the highest quality land in the Country. The local economy is based on agriculture and food production. As such the proposed scheme is detrimental to local community and economy. Nationally it threatens our food security.<br><br>The loss of BMV land is a prime concern. The National Policy Statement, recently reinforced by the ministerial statement, makes clear that poorer quality land is to be preferred for solar farm development and the impact on best and most versatile land (BMV) land should be minimised. In granting development consent the Secretary of State has 'to ensure that applicants do not site their scheme on BMV land without justification.' (para 5.11.34 of EN-1). It is also a material consideration | The Applicant is aware that NPS EN-1 seeks for schemes not to be sited on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a) and preferably use land in areas of poorer quality (grades 3b, 4 and 5). However, as stated within NPS EN-1 5.11.34, where schemes are to be sited on the best and most versatile agricultural land, the Secretary of State should take into account the economic and other benefits of that land.<br><br>The Applicant acknowledges the importance of protecting BMV agricultural land and recognises the objectives of the Land Use Framework (Defra, 2026) to support sustainable food production alongside the delivery of environmental outcomes. The Framework recognises that agricultural land use exists on a continuum, balancing food production with other national priorities according to the characteristics and capabilities of the land. It also acknowledges the important role that renewable energy development will play in achieving the UK's net zero ambitions. |

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| | under the Town and Country Planning Act 1990 and a relevant consideration for Nationally Significant Infrastructure Projects.<br><br>This policy position was confirmed in writing by the Minister of State for Energy which stated 'Planning guidance makes clear that, wherever possible, developers should utilise brownfield, industrial, contaminated, or previously developed land. Where the development of agricultural land is shown to be necessary, lower quality land land should be preferred to higher-quality land'. ( Letter from Michael Shanks MP minister of State for Energy toDr Caroline Johnson MP dated 24 April 2026).<br><br>The Land Use Framework published by DEFRA in March 2026, reinforces the need to protect quality land from development. The Framework recognises the importance of renewable energy in the Land Use Framework in setting out the vision for 3030 and 2050. 'By 2050 agricultural land will be managed to prioritise sustainable food production and environmental benefits'. It recognises that " Agricultural land use reflects a continuum of approaches balancing food production and other outcomes according to the strengths of the land.'<br><br>It is vital that the changing direction of land use be protected now if this goal is to be met. The year | **ES Chapter 3: Alternatives and Design Evolution** [APP-054] and **Appendix D: Site Selection Report of the Planning Statement** [APP-264] provide a description of the detailed process and assessment of the alternatives process undertaken by the Applicant. The assessment has considered the locational criteria (environmental, social and economic, electrical and engineering constraints) that geographically influenced the areas of search.<br><br>**ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) provides a detailed assessment of the impact of the Scheme on the land. Ensuring that any necessary mitigation requirements are secured and confirmed within the **Environmental Mitigation and Commitments Register** (Doc Ref. 7.7 Rev 1).<br><br>The Cumulative Effects section within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 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.<br><br>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 |

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| | 2050 is is just 24 years away. The milestone date identified in the Framework is 2030 when it is anticipated that famers and land managers will have clarity on the long-term opportunities for their land and policy on food production. In contrast the Meridian Solar project is anticipated, subject to Consent, to commence construction in 2029 and operate for 40 Years from 2033 plus time for decommissioning, meaning that some 1100 hectares of the best agricultural land in England will be lost to quality food production for around 45 years.<br><br>Food security is increasingly of importance to the UK, but we are less than 50% self-sufficient. Thus even a small (quoted less than 1%) reduction of agricultural land is not warranted when alternative options exist for solar electricity production e.g. roof tops, land which is not classed as BMV. As the recent wars in Ukraine and the Middle East have demonstrated the necessity and benefit of better food security, any future defence strategies should include these as an important consideration.<br><br>In terms of food security, It is interesting to note that in World War 2 Lincolnshire became known as Bomber County with over 40 airfields yet at the same time the South Holland area did not have any | that solar farms do not in any way present a risk to the UK's food security; and solar farms contribute to addressing the biggest medium to long term risk to the UK's domestic food production: climate change.<br><br>While noting the above, the Scheme 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>Regarding paragraph 5.8.2, this relates to the siting of infrastructure which will be positioned on hardstanding. 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 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 Rev 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 Rev 1). Further information is provided within **ES Chapter 3: Alternatives and Design Evolution** [APP-054]. |

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| | such airfields. The reason: to protect agricultural farmland.<br><br>2.3 In deciding an application for an order granting development consent, the Secretary of State "should ensure that applicants do not site their scheme on BMV land without justification. Where schemes are to be sited on BMV agricultural land the Secretary of State should take into account the economic and other benefit of that land" Para. 5.11.34 of EN-1)<br><br>2.8 Currently solar farms are regarded as a temporary use of land since they are predicted to have a life span of 40-60 years after which they may return to their original use ie agriculture. Clearly this is nonsense both by virtue of the timeframe and the actual industrialisation of the rural countryside. Such an interpretation of temporary is misleading and threatens food security.<br><br>2.9 It was understood that the BMV land would be reinstated. However Meridian's submission makes clear that this may not be be feasible ' professional judgement has been applied with respect Grade 1 & Grade 2 land where it might not be possible to re-establish that standard of BMV land, (ES Chapter 5: Agriculture and Soils March 2026 Para 5.8.2). | |

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| | 2.10 In summary we believe that the loss of BMV agricultural land should not be assessed in isolation but within the context of the impact caused to the local economy. Given its significant importance locally and nationally is to send the wrong message about the importance the UK gives to food security.<br><br>In short, the project should have its focus on non-BMV land and be reduced in scale and size as accordingly be developed elsewhere on land of lower quality. | |
| Site Selection | The number of applications to develop solar farms on Lincolnshire is immense. The Meridian Solar proposal is at the cost of the loss of BMV land. It is driven by availably and easy access to the National Grid sub-station at Weston Marsh and related infrastructure. There is no evidence that there has been a site selection process outside the site that was selected at the outset with scant regard for site options elsewhere. As such It is the easy option, not one that meets the spirit of Government guidance on site selection. We ask for information on what and where, if any, other sites were identified and assessed. In the absence of this information, we believe that the site selection process to be flawed Meridian chose the proposed grid connection at Weston Marsh and have fully evaluated the land | As set out in the Planning Statement: Appendix D: Site Selection Report [APP-264], the Applicant considered a range of environmental, technical and planning constraints when identifying the Solar Development Area. Given the nature and distribution of these constraints, there are no obvious alternative combinations of smaller unconstrained land parcels capable of accommodating the proposed development at a similar scale whilst demonstrably reducing environmental effects.<br><br>Furthermore, a key principle underpinning the land assembly strategy has been to secure land through voluntary agreement and therefore reduce reliance on compulsory acquisition powers. Whilst the Applicant has engaged with a number of landowners, increasing the number of separate parcels and land interests would have added complexity to |

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| | identified in their submission. They pay lip service to identification and evaluation of only one other site: at Bourne<br><br>By choosing just one alternative site which by nature does not lend itself solar development and then selecting a site which is largely BMV, Meridian Solar have deliberately chosen a site which in principle should to be avoided from solar development. This might be described as evasion of the legal requirements.<br><br>Meridian state repeatedly throughout their submission that it is not possible to avoid the use BMV on this land given the very high proportion of BMV in the area. This is a flawed argument. It could be avoided through the selection of a project site elsewhere particularly given that Downing Renewables (Meridian Solar) are a large nationwide an international company.<br><br>They are driven by the convenience of a connection point to the National Grid close to 1100 hectares of flat developable land, a small number of willing large landowners and complete disregard for the amount of BMV which will be lost to one of the most valuable agricultural economies in the country. | the negotiation process and likely increased the number of affected landowners and the need to rely on powers of compulsory acquisition, which could in turn adversely affect the deliverability and programme of the Scheme.<br><br>Paragraph 4.3.9 of EN-1 establishes there is no "*general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change requirements in relation to compulsory acquisition and habitats sites*". Where the Applicant has considered alternatives, these are described in ES Chapter 3: Alternatives and Site Selection and the Planning Statement: Appendix D: Site Selection Report [APP-264].<br><br>While, paragraph 2.10.21 of EN-3 gives preference to the development of solar PV generation on poor quality land in order to avoid the use of BMV land where possible, is explicit that "*land type should not be predominating factor in determining the suitability of the site*".<br><br>Given the high variability of soils as presented in ES Chapter 5: Agriculture and Soils (Doc Ref. 6.1 Rev 1) and illustrated on ES Figure 5-1 and ES Figure 5-2 [APP-088 and APP-089], it is not possible to site the Scheme wholly on land of poorer land quality without substantial fragmentation. Therefore, land type has not been a predominating factor in determining the suitability of the site for hosting the Scheme more |

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| | Meridian Solar selectively interprets the planning guidance on land by stating that it does not restrict developing solar on BMV land but should it choose to develop solar on that land it would minimises its use. Where land is largely BMV it should be disregarded for solar development at the outset of the evaluation. There are other areas/regions where the predominant land is of lesser quality.<br><br>There are issues with the calculation of the area of BMV land to be taken by the proposes project:<br><br>The proportion of BMV land to be lost is is calculated by Meridian as 418.6 hectares or 39% of the area. This based on overall solar development area as being 1067.7 hectares. However 3.3 non-agricultural ha and 122.1 ha which have not been surveyed are included in the total. Once these irrelevant areas are excluded the total area is reduced to 941.6 hectares. This produces a revised proportion of BMV land which will be lost to 44.42% (Table 5-10 ALC Classification). In addition there is a further loss of BMV land due to the Inter Array Connections - and the Grid Connection Route. This totals 509.6 hectares of primarily Grade 1 with all of the land taken being BMV. The submission provides only limited information on the loss of BMV land since there is a lack of information on the land take | generally. Consideration has been given to the siting of more impactful infrastructure (such as the On-Site Substations and BESS Compound) on land of the highest ALC grades, but consideration is also given to other constraints that must be addressed to ensure the safe and efficient operation of the Scheme, e.g. flood risk. These constraints which need to be balanced are described in more detail within the Design Approach Document [APP-268].<br><br>The cumulative impact on agricultural land and soils is considered within Section 5.11 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1). Based on previous reporting as part of other NSIPs in Lincolnshire and the extrapolation of available mapping, the proportion of BMV land in the county is estimated to be in the order of 71%. It is estimated that the cumulative impact of solar schemes will account for approximately 3% of all BMV land in Lincolnshire. 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.<br><br>The Applicant has worked hard to avoid, reduce and mitigate adverse effects through application of the mitigation hierarchy and consideration of good design, but appreciates that the Scheme would still give rise to significant adverse effects on agricultural land and soils. However, the strength of the needs case established through the NPSs and the CNP |

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| | developed for sub-stations and the BESS compound and other infrastructure However at minimum the total loss of BMV land to the solar project amounts to a minimum of 928.2 hectares Additionally there would be further loss of BMV land through the development of the National Grid Sub-station B at Weston Marsh. Although not part of the DOC application it is critical to the the Meridian Solar Farm development.. The use of this land is not regarded as temporary.<br><br>Lincolnshire bears a disproportionate number of solar farm consents/applications. Five have been granted consent and eight are in the pipeline. Site selection should not involve the loss of BMV land, including not only Grade 1 but also Grades 2 & 3a. | infrastructure status that applies to the Scheme, outweighs the residual adverse effects. |
| Impact on the local community | Meridian Solar's application for DOC underplays the significance of the project to the local area and its cumulative impact on the local community. The focus on the impact of the individual matters which together constitute the solar project as a whole mean that the overall impact is not holistically taken into account. The proposed project is one of the largest solar farms in the country. It covers an area of 1100 hectares comprising a solar generating station with associated infrastructure, including a co-located BESS, inter-array connection to link four | Impacts on surrounding residents and businesses during construction, operation and decommissioning have been considered in the following technical chapters of the ES:<br><br>ES Chapter 6: Air Quality [APP-057];<br><br>ES Chapter 10: Human Health [APP-061];<br><br>ES Chapter 12: Landscape and Visual [APP-063];<br><br>ES Chapter 13: Noise and Vibration [APP-064];<br><br>ES Chapter 14: Socio-economics and Land Use [APP-065]; |

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| | parcels of land that form the Solar Development Area, and an up to 13 km overhead line Grid Connection running north towards point of connection at the planned Weston Marsh National Grid Electricity Transmission sub-station.<br><br>The area of quasi-industrial development spreads across a number of towns and villages including: Crowland Postland Shepeau Stow Whaplode Drove Holbeach St Johns Holbeach Drove Gedney Hill Fleet Cowbit Weston Hills Weston Moulton Moulton Seas End.<br><br>It is a rural area of flat fenland characterised by open views and big skies. The land use is predominantly agriculture on some of the richest high quality land in the country. With the exception of the town of Crowland residential dwellings largely have pattern of linear development in smaller villages and communities. Other dwellings are at more remote locations around the villages.<br><br>Public transport is extremely poor with a high reliance on cars. The road infrastructure is significantly poor (see next section). It is a quiet peaceful environment appreciated by local residents. A construction period of 4 years would have an | ES Chapter 15: Traffic and Access [APP-066]; and<br><br>ES Chapter 17: Effect Interactions [APP-068].<br><br>These chapters also consider cumulative effects with other projects within the study area. Measures have been set out within the OCEMP (Doc Ref. 7.10 Rev 2), OOEMP (Doc Ref. 7.11 Rev 1), ODEMP (Doc Ref. 7.12 Rev 1) and oCTMP [APP-278] which would limit disruption to the local community, as far as practicable.<br><br>The Applicant notes the comments regarding the landscape character effects of the Scheme. The submitted LVIA provides a detailed assessment of landscape effects during construction, operation and decommissioning, including the identification of significant residual effects where these are predicted to occur. The assessment also recognises that, due to the scale and nature of certain permanent infrastructure, significant adverse effects remain for some landscape receptors following the implementation of mitigation. These conclusions are clearly set out in **ES Chapter 12: Landscape and Visual** [APP-063], together with its supporting appendices. The Applicant recognises the significant adverse landscape and visual effects and has taken these into account in its planning balance set out within the Planning Statement [APP-260]. The Applicant has developed the Scheme proposals to avoid, reduce and mitigate adverse |

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| | adverse impact with a continuing impact over the 40 years of operation.<br><br>The impact on local residents due significant increased construction traffic, noise, visual impacts, wildlife disruption etc should not be underestimated. Most residents in the area value peace and quiet highly, hence choosing the area to live.<br><br>Rural communities should not disproportionately bear the environmental and social burdens of large infrastructure projects that primarily/exclusively benefit urban areas or large corporations. | effects through application of the mitigation hierarchy and consideration of good design, but such is the nature of large-scale infrastructure projects. The status of the Scheme as a Critical National Priority (CNP) infrastructure means that residual impacts, including landscape and visual, should not outweigh the urgent need for the Scheme in the planning balance. There are no residual impacts on any of the exceptions listed at paragraph 4.2.98 of EN-1 nor are any exceptional circumstances present that would reverse this presumption. The Applicant maintains its view, that while the significant adverse landscape and visual effects reported will attribute some negative weight in the planning balance, the substantial benefits and urgent need for the Scheme outweigh these adverse impacts.<br><br>Furthermore, the Applicant considers that the Scheme will provide a number of benefits to the local community, including:<br><br>- Provision of local employment, apprenticeships, skills training, supply chain opportunities and increased spend in the local area;<br><br>- While it does not form part of the DCO Application, the Applicant is committing to a Community Benefit Fund of approximately £500,000 per year of operation of the Scheme (up to £20 million in total assuming a 40-year operational period), should the Scheme gain consent. The fund is not linked to the effects reported within the |

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| | | Environmental Statement as it is not considered mitigation or compensation (which are separately provided and secured as part of the DCO Application). The Applicant will work with the local authorities and parish councils to further develop its Community Benefit Fund proposals;<br><br>- Provision of a permissive path connecting Public Rights of Way between Queens Bank and Shepeau Stow, following the boundary of the Settlement W of Cate's Cove Corner Scheduled Monument ;<br><br>- Provision of biodiversity net gain, as set out within the Biodiversity Net Gain Report (Doc Ref. 7.9 Rev 1). |
| Socio-Economics and Land Use | The Table in ES Chapter 14 Socio-Economics and Land Use identifies 8 areas where there is a residual impact. Of these one: land take and disruption affecting farm holdings and production is deemed to have a residual impact as Negligible to Minor Adverse (Not Significant) Given the size and scale of the project this appears to be a gross under calculation.<br><br>Particular areas of concern include: the severance of agricultural land holdings - the submission appears to treat land availability as a readily available asset, easily traded severance of roads - this will to cause disruption on what is already poor infrastructure the impact of a significant temporary labour force - | **ES Chapter 14: Socio-Economics and Land Use** [APP-065] has assessed effects on severance of agricultural land holdings. This has concluded that effects on directly impacted agricultural land holdings would not be significant during construction, operation and decommissioning based on the small temporal and spatial scale (as well as planned reinstatement measures of any farmland required) of any construction and decommissioning impacts, and the limited permanent land take for operation further to that required for the Solar Development Area (which would be subject to voluntary land take from co-operating relevant landowners) not expected to materially alter any agricultural land holding's utility. Access to agricultural land not directly impacted by the Scheme would be managed through |

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| | during the construction phase there will be on average 207 total net jobs per annum.The peak construction workforce is estimated at 855 FTE staff per day. Of these 40% would be recruited locally with 60% coming from a 60 minute drive time. There is little information of how this impact would be managed for instance travel, co-ordinated arrival and departure on site, demand for local services, individual choice to depart from project management plans impact on visitor accommodation - the scale of the migrant workforce adversely effects the availability of visitor accommodation. In the 7 months of the year the availability of accommodation in major hotels within a 60 minutes falls to under 12% of the total such accommodation. The impact falls not only on South Holland but on the wider region. This would have an adverse affect on the tourism sector. | individual agreements with the relevant landowners such that there would be no significant effects on relevant agricultural land holdings.<br><br>**ES Chapter 15: Traffic and Access** [APP-066] outlines the assessment of severance on local roads. The assessment finds that based on the low and very low sensitivity of the screened-in local roads and junctions, driven by the absence of sensitive receptors and rural setting (further justified within Table 15-23), no significant severance effects are expected. Eight road links and four junctions are likely to experience minor adverse effects (not significant) as a result of construction, with all other assessed road links and junctions expected to experience negligible effects.<br><br>In respect of travel arrangements for the temporary construction workforce during construction, as outlined within the **OCTMP** [APP-278], a shuttle service will be operated to transport up to 470 workers from 'staff clusters' in larger settlements in the region, such as Peterborough, Grantham, Boston, Wellingborough, Huntingdon, and St Neots. These shuttles would be able to transport the vast majority of the non-local workforce to and from these settlements. The plan also outlines that all staff would be expected to arrive in the hour before the start of their shift and depart in the hour after their shift; on weekdays, the proposed working hours are from 7am to 7pm, meaning workforce travel would take place outside of typical peak |

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| | | network hours. As detailed above, workers are expected to be accommodated in 'staff clusters' in larger settlements, and the number of workers staying within smaller local settlements is likely to be minimised. As outlined within **ES Chapter 10: Human Health** [APP-061], non-local workers would be unlikely to access primary healthcare facilities in the vicinity of the Scheme as it is anticipated that these workers will remain registered with the GP surgery near their permanent home or utilise health services near to their place of temporary accommodation which, as set out above, is likely to be in larger settlements away from the immediate local area. Additionally, any on-site incidents requiring emergency treatment would likely be provided at the nearest hospitals with Accident and Emergency units, Pilgrim Hospital Boston and Peterborough City Hospital. Therefore, no significant effects on service provision such as local primary healthcare would be expected to arise.<br><br>In **ES Chapter 14: Socio-Economics and Land Use** [APP-065], Table 14-22 includes an assessment of potential effects on local accommodation supply within a 60-minute Drive Time from the Scheme during construction. In a worst-case scenario where the peak construction workforce aligned with peak seasonal demand (in July), there would be a remaining availability of 7%. This is an 8 percentage point difference from the typical availability in July of 15% indicating that roughly half the usual available |

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| | | accommodation would still be unused when the potential impact on capacity from worker demand is at its highest. Further, the assessment only considers large hotels within large urban settlements, meaning that the overall availability of rooms across all hotels, private rented accommodation, and other accommodation types within 60-minutes drive is likely to be substantially larger. |
| Likely Significant Environmental Effects | A summary of the identified likely significant residual effects ( ie moderate and major, adverse and beneficial effects is presented in Table 18-1 for the construction phase &Table 18-2 for the operational phase. With regard to the Residual Effects 36 are identified as having a moderate adverse effect (Significant) . Additionally one has a moderate/major adverse residual effect and two have a major adverse residual effect.<br><br>For the operational phase there will be a residual effect on the views of the landscape due to visibility of infrastructure at 39 view points. With one exception which is described ad major adverse (significant) the remainder are classed as having a residual effect which is moderate adverse (significant). These findings are not dissimilar to the residual effects from the decommissioning process. | **ES Chapter 12: Landscape and Visual** [APP-063] and associated figures and appendices provide a detailed assessment of residual landscape and visual effects and their significance.<br><br>The iterative design process and evaluation on the feasibility of underground cables and overhead transmission lines is described in **ES Chapter 3: Alternatives and Design Evolution** [APP-054]. Table 3-2 compares the potential environmental effects from the construction of an underground cable and an overhead line for the Grid Connection, stating that "*for both landscape and visual receptors an underground cable would largely avoid the presence of permanent above ground infrastructure and is therefore expected to give rise primarily to effects associated with construction, and these would be temporary and localised in nature*". Paragraph 3.5.28 states that "*With due regard to the environmental effects, the receptors that may experience likely residual significant effects from an overhead line are landscape and visual receptors, and designated heritage assets* |

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| | This demonstrates that the proposed project will completely transform the unique Fenland landscape with a effect lasting 40-50 years. This fundamental change means to loss of distant views and big skies through the development of a quasi industrial landscape. | *due to changes to their setting. In relation to an underground cable solution, potential effects on buried archaeological deposits may be extensive depending on the location of the trenching. 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*". Further, the adoption of overhead lines aligns with the presumption from the government in support that they should be the preferred technology for electricity networks as set out at paragraph 2.9.21 of the NPS for electricity networks infrastructure (EN-5). |
| Human Impact | The following aspects of human health potential due to impact of the scheme are considered in Chapter 10:<br><br>Air Quality, dust & odour; Electric & Magnetic Fields (EMF) Employment and training opportunities<br><br>More generally, many residents have resided in the area for many years enjoying life in the rural countryside. Other have moved to area more recently attached to the peace and quiet of the rural countryside. The open landscape, together with the associated bird and wildlife, is much valued by the local community.<br><br>The project will bring a fundamental change to this environment. The quasi industrialisation of this quiet | **ES Chapter 10: Human Health** [APP-061] provides an assessment of potential impacts and likely significant effects during construction, operation and decommissioning of the Scheme on health and wellbeing, including physical and mental health.<br><br>The assessment concludes that with measures set out within the management plans submitted with the DCO Application, no significant effects on health and wellbeing are considered likely.<br><br>Specifically, measures to minimise effects are set out within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1). All construction activities will be undertaken in accordance with relevant Health and Safety legislation and industry guidance. |

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| | rural setting surrounded by so many settlements will only harm those communities with an impact on mental and physical health. | **ES Chapter 15: Traffic and Access** [APP-066] details the Applicant's consideration of the effects of increased traffic levels during construction and proposed mitigation measures.<br><br>Specifically, measures to manage construction traffic and protect road user safety are set out within the oCTMP [APP-278], which identifies how traffic impacts from the Scheme will be minimised. |
| Cumulative Effects of NISP Projects | There is potential impact from other NISP projects being planned/constructed in the locality. In addition to the Meridian Solar project itself, in their submission Meridian Solar identify 11 NISP projects within a 25km radius which overlap at time with the construction of Meridian Solar. (Ref.EN010169). As such there is potential impact on the cross-development area described as environmental impact. These vary in nature from project to project but the following areas are commonly identified: Potential for significant environmental effects that merit consideration within the Cumulative Effects Assessment (CEA)<br><br>Topics considered:<br><br>• Agriculture & Soils Air Quality Cultural Heritage Ecology and Biodiversity Human Health Hydrology and Flood Risk Landscape | A cumulative assessment has been undertaken for all environmental topics considered within the ES and is provided within the technical ES chapters. As summarised within Section 6 of **ES Non-Technical Summary** [APP-070], significant cumulative effects have been identified with regards to the change to the setting of adjacent heritage assets and historic landscape from, landscape character and visual amenity, and cumulative construction traffic on A151 Holbeach Road, A16 South of Crowland, A16 North of Peterborough, Hull's Drove (East) (albeit this is largely attributed to the traffic generated by the cumulative schemes).. |

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| | and Visual Noise and Vibration Socio-Economics and Land Use Traffic and Access Electric and Magnetic Fields.<br><br>These effects will vary from project to project.<br><br>Similarly the potential cumulative effect of traffic is identified in Meridian Solar's application. It is expected that the Planning Inspectorate will carry out a thorough review the cumulative impact of NISP projects. | |
| 6.0 Traffic & Access | Of particular concern to the local community is the large increase in heavy and frequent traffic causing significant and prolonged disturbance. The road network is poor and inadequate for such use. We also draw attention to the busy harvest period.<br><br>The project site and the surrounding area comprise the Fens an area historically claimed from the sea being drained by Dutch drainage engineers in the 17th Century. This forms a unique landscape characterised flat open countryside subject to regular subsidence. This is reflected in the nature of the land. | The Applicant has given consideration to the forecast increase in construction traffic and the ability of the existing highway network to accommodate these movements. The effects of construction traffic associated with the Scheme have been assessed in **ES Chapter 15: Traffic and Access** [APP-066], which considered forecast construction vehicle movements, the characteristics and capacity of the local highway network, and the potential effects on local communities and road users. The assessment concludes that, with the implementation of the proposed mitigation measures, the Scheme would not give rise to any significant traffic and transport effects during construction.<br><br>The mitigation measures are set out within the oCTMP [APP-278 and APP-279], which establishes the framework for managing construction traffic throughout the construction phase. As detailed within the oCTMP, no |

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| | | construction traffic would travel during the local AM network peak period (08:00 to 09:00), and only limited HGV movements are anticipated during the PM peak period (16:00 to 17:00). In addition, the Scheme has been designed with multiple access points to distribute construction traffic across the highway network, thereby reducing the potential for concentrated impacts on any individual route.<br><br>As set out within the oCTMP, the Delivery Management System (DMS) will be implemented from the commencement of construction to manage HGV deliveries. The DMS will regulate vehicle arrivals through timed delivery slots and will also be used to monitor compliance with approved HGV routing arrangements, which will be communicated to all suppliers. Measures will also be implemented to ensure that no queuing associated with construction traffic extends from site accesses onto the surrounding highway network.<br><br>The Applicant acknowledges that certain sections of the local highway network may be more sensitive to construction traffic. Accordingly, and as secured through the oCTMP, highway condition surveys will be undertaken before, during and after construction along agreed construction traffic routes to establish baseline conditions, and monitor any deterioration attributable to the Scheme.<br><br>The Applicant also recognises concerns relating to agricultural activities, including during the harvest period. While harvesting typically takes place between July and |

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| | | October, construction traffic associated with the Scheme would be temporary in nature and managed through measures secured by the oCTMP and subsequent Detailed CTMP. These measures would include controls on construction traffic routing, timing and phasing to minimise disruption to local residents, farming operations and other road users, as far as reasonably practicable.<br><br>Temporary road closures are anticipated to be required only on minor unclassified roads with relatively low traffic flows. It is not expected that multiple closures would occur simultaneously or in close proximity to one another. Such works would be carefully planned to minimise impacts on local residents and road users and may be required where access construction activities need to complete tie-ins with the existing carriageway. Appropriate traffic management measures would be implemented throughout these activities to maintain safe and efficient operation of the surrounding highway network.<br><br>While some temporary disruption may occur during certain stages of the construction programme, any effects would be short-term and limited to the duration of the construction phase. The Applicant therefore considers that the potential effects on local roads, agricultural operations and the wider community have been appropriately assessed and that suitable mitigation measures have been identified to minimise impacts throughout construction. |

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| | Many of the roads designated as transport links for the project are narrow and/or single carriageway roads, commonly bordered by dykes (ditches/drains), not suitable for heavy vehicles and machinery. Road condition is generally poor with many potholes and cracks, soft grass verges and shifting road surfaces leading to cracked and uneven surfaces. The area is subject to continuous subsidence and roads commonly break. Due to uneven road surfaces, vehicle damage is common, both to vehicle suspension and vehicles running into adjacent ditches (dykes) and drainage systems. Road Traffic Accidents are common particularly on Hulls Drove which acts as one of the main spines providing access to the solar panel areas. Another, the Barrier Bank to Crowland Road(former A1073( proposed to be used for access to land Area 1 and to the BESS site has been closed to traffic due to cracking and subsidence, deemed to be unsafe for traffic. It has been closed for 10 months at May 2026 with no indication of when it will reopen with neither a plan or budget. There is also concern locally about the significant number of vehicles particularly HGVs and Large Indivisible Loads. | The Applicant has considered the suitability of the local highway network throughout the construction, operation and decommissioning phases of the Scheme, including narrow rural roads, passing places (strategy and design currently under consultation with LHA), traffic routing, access arrangements and road safety. A detailed assessment of traffic and transport effects is presented in **ES Chapter 15: Traffic and Access** [APP-066], which concludes that no significant effects are anticipated following implementation of the mitigation measures secured through the oCTMP [APP-278 and APP-279].<br><br>The assessment includes consideration of HGV and AIL movements, road user safety, and the sensitivity of rural roads within the study area. HGV and AIL routes are shown in **ES Figures 15-3 and 15-4** [APP-161 and APP-162], with further traffic management measures secured through the oCTMP. Construction access arrangements have been developed to minimise impacts on local communities and sensitive receptors, including avoiding construction traffic routing past South View Primary School and Shepeau Stow Primary School, avoiding the village of Crowland as well as Dowsdale Bank and Cox's Drove.<br><br>The Applicant acknowledges concerns regarding the condition of local roads, including subsidence, surface deterioration, soft verges and roadside drainage ditches. To address this, the oCTMP commits to highway condition |

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| | | surveys before, during and after construction on agreed construction traffic routes. Any defects to highway assets or verges attributable to the Scheme would be identified in consultation with the relevant Highway Authority.<br><br>Road safety has also been considered as part of the assessment. Analysis of Personal Injury Collision data on Hulls Drove identified an above-average collision rate on a section between Martins Road and Holbeach Drove Gate. Consequently, the sensitivity of this route was increased within the assessment; however, due to the low forecast volume of Scheme traffic using the route during peak construction, no significant road safety effects were identified as a result of the Scheme.<br><br>With regard to Barrier Bank, the Applicant will continue to engage with Lincolnshire County Council regarding its status and any future reopening programme. As construction is not anticipated to commence before 2029, should Barrier Bank remain closed at that time, Scheme traffic would not be routed through Crowland.<br><br>The Applicant has also assessed potential effects on drainage features in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1), which concludes that no significant effects are expected following implementation of mitigation measures secured through the **OCEMP** (Doc Ref. 7.10 Rev 2). |

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| | | The Applicant therefore considers that the condition and suitability of the local highway network, including routes such as Hulls Drove, Langary Gate Road and Barrier Bank, have been appropriately assessed and that robust mitigation measures will be in place to ensure construction traffic, including HGVs and AILs, can be accommodated safely while minimising impacts on local residents, businesses and road users. |
| | The narrow roads proposed as transport routes are commonly bounded by deep drainage ditches which make the construction of passing places not feasible. Additionally heavy traffic can cause damage to drainage channels, leading to flooding and disruption of the Internal Drainage Board's work. Passing places are suggested as a mitigating measure, for example at Queens Bank. Given the silt soils, it is questioned whether this is technically feasible. Cloot Drove and Langary Gate Road present similar difficulties.<br><br>Hulls Drove, which is a main route from the A16 to Holbeach and Gedney Hill and beyond, has been subject to numerous closures for major repairs in the last couple of years which then have only lasted a few months. Statistics for Hulls Drove also demonstrate a high incidence of road traffic accidents. Cloot Drove is narrow and undulating with little room for traffic passing, let alone for heavy | The Applicant acknowledges the concerns raised regarding the suitability of local roads for construction traffic, including the presence of narrow carriageways, roadside drainage ditches, highway condition, road safety, and the potential effects of increased traffic on rural roads.<br><br>A detailed assessment of traffic and transport effects has been undertaken within **ES Chapter 15: Traffic and Access** [APP-066]. The assessment considers the potential impacts of construction traffic on the local highway network and is supported by the **oCTMP** [APP-278 and APP-279], which sets out measures to minimise disruption and manage construction traffic safely.<br><br>As part of the ongoing development of the Scheme, the Applicant is preparing a Temporary Passing Place Strategy in consultation with the Local Highway Authority. This strategy will identify the location and extent of any temporary passing places required and will take account of site-specific constraints, including highway geometry, drainage ditches, |

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| | goods vehicles. Similarly, the A16 Crowland bypass is of poor quality, despite only being a relative recent addition to the road network. Recently it has been subject to an 8 week regrading and resurfacing works programme, since it has undergone a programme of patch repair. Some of the minor roads suggested as transport routes such as Langary Gate Road, and Queens Bank currently receive very little traffic, often only a hundred or so vehicles a day, thus the peace and quiet of these rural backwaters will be lost. | ground conditions, vegetation, utilities, highway boundaries and third-party land interests. The design process will seek to minimise environmental effects while ensuring the safe passage of construction traffic. The completed strategy will be shared with Lincolnshire County Council prior to submission during Examination.<br><br>The Applicant recognises concerns regarding potential impacts on roadside drainage infrastructure. Existing drainage features and flood risk have been assessed in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1), which concludes that no significant effects are expected following implementation of the mitigation measures secured through the **OCEMP** (Doc Ref. 7.10 Rev 2). Any temporary highway works, including passing places, will be designed with due regard to existing drainage features and relevant stakeholder requirements.<br><br>The Applicant also recognises concerns regarding the condition of local roads such as Hulls Drove, Langary Gate Road, Cloot Drove and Queens Bank. In accordance with the oCTMP, pre-construction, during-construction and post-construction highway condition surveys will be undertaken along agreed construction traffic routes. Any damage attributable to Scheme construction traffic will be identified in consultation with the relevant Highway Authority.<br><br>In relation to road safety, collision data for Hulls Drove was assessed within **ES Appendix 15-4: Transport Assessment** |

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| | | **Note** [APP-251]. While the eastern section of Hulls Drove was identified as having a higher-than-average collision rate compared with equivalent rural roads, no common causation factors were identified which would indicate an inherent highway safety issue. The assessment concluded that, due to the relatively low volume of construction traffic forecast to use this route, no significant road safety effects are anticipated during the peak construction period.<br><br>Construction traffic routes have been carefully selected and are shown within **ES Figures 15-3** [APP-161] and **15-4** [APP-162]. The routing strategy has been designed to distribute traffic across the network and, where practicable, avoid sensitive locations, including village centres and school routes. In addition, the majority of construction traffic movements will occur outside peak highway periods as a result of the measures set out in the oCTMP.<br><br>The potential effects of construction traffic on local communities, including severance, delay, driver stress, fear and intimidation, and user amenity, have been assessed within **ES Chapter 15: Traffic and Access** [APP-066]. The assessment concluded that there would be no significant effects on roads including Langary Gate Road and Queens Bank, or elsewhere on the construction traffic network, following implementation of the proposed mitigation measures. |

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| | | The Applicant therefore considers that the suitability of the local highway network, the need for temporary passing places, road safety considerations and potential construction traffic impacts have been appropriately assessed. Appropriate mitigation and management measures are secured through the oCTMP and subsequent Construction Traffic Management Plan process to ensure that construction traffic can be accommodated safely while minimising effects on local residents, road users and the surrounding rural environment. |
| | Because the minor roads are so quiet, they are regularly used by cyclists, walkers, horse riders etc. There are few pedestrian pathways or pavements, thus any suggestion of passing places is likely to affect pedestrian traffic and human safety. There is concern at increased traffic on the small local roads which generally have no pedestrian walkways. Traffic is generally very low, whilst livestock and wild animals, especially deer often cause accidents since they either escape onto roads or cross without warning. | The Applicant notes the stakeholder's concerns regarding the use of local roads by pedestrians, cyclists, horse riders and other non-motorised users, together with concerns regarding livestock and wildlife on the local road network.<br><br>The Applicant has given consideration to the impact of construction traffic on all road users. An assessment is presented in **ES Chapter 15: Traffic and Access** [APP-066], which considered the potential impacts and likely significant effects of the Scheme, including road user and pedestrian safety. The assessment concluded that, with the implementation of mitigation measures secured through the **oCTMP** [APP-278 and APP-279], no significant effects are anticipated.<br><br>The impact of construction traffic on non-motorised users (NMUs) was specifically assessed in ES Chapter 15 [APP-066]. This assessment considered severance, delay, user |

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| | | amenity, and fear and intimidation for pedestrians, cyclists and equestrians using routes affected by construction traffic. The assessment concluded that there would be no significant effects on NMUs during the construction phase.<br><br>The Applicant acknowledges that many of the local roads are rural in character, have limited pedestrian infrastructure and are regularly used by walkers, cyclists, horse riders and other vulnerable road users. These characteristics have informed both the assessment and the mitigation measures incorporated within the oCTMP. Measures such as traffic marshals at site accesses and crossing locations, together with traffic management and monitoring measures, are included to support the safe interaction of construction traffic with other road users.<br><br>The Applicant is currently developing a Temporary Passing Place Strategy to support the movement of construction traffic along the surrounding road network. This document will be submitted during Examination following further engagement with the Local Highway Authority. The strategy will identify the location and extent of any temporary passing places required and will take account of existing constraints, including highway geometry, drainage features, vegetation, utilities, boundary features and third-party land interests. It will also seek to minimise vegetation loss and ensure suitable visibility between passing places to facilitate the safe movement of vehicles. Details of the strategy will be |

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| | | shared with Lincolnshire County Council for review prior to submission into the Examination.<br><br>The Applicant does not consider that temporary passing places would adversely affect pedestrian safety or NMU amenity. Instead, by providing suitable opportunities for vehicles to pass on narrow sections of road, passing places would reduce the need for vehicles to reverse or undertake difficult manoeuvres, thereby supporting the safe operation of the local road network for all users.<br><br>The Applicant also notes concerns regarding livestock and wildlife, including deer, using or crossing local roads. The presence of livestock and wildlife on the highway network is an existing characteristic of the area and has been considered as part of the wider road safety assessment. **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) concluded that no significant effects on wildlife are likely, including effects associated with construction traffic, taking account of the forecast number of construction vehicle movements, proposed traffic routes and mitigation measures.<br><br>In addition, the road safety assessment presented in **ES Chapter 15** [APP-066], which included a review of five years of Personal Injury Collision data, concluded that construction traffic associated with the Scheme would not result in significant road safety effects. The collision analysis did not identify evidence that the forecast increase in traffic would |

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| | | materially increase the risk of collisions involving wildlife, livestock or other road users. It is noted that, of the 11 recorded collisions on Hull's Drove during the assessed five-year period, only one involved a deer entering the carriageway, and this collision was recorded as slight in severity.<br><br>The Scheme has also been designed with multiple construction access points to distribute traffic across the network and avoid significant effects at any single location. Furthermore, the core construction working hours are arranged so that the majority of construction traffic movements occur outside peak traffic periods, as set out in the **oCTMP** [APP-278 and APP-279].<br><br>The Applicant therefore considers that the potential effects of the Scheme on pedestrians, cyclists, horse riders, livestock, wildlife and other users of the local road network have been appropriately assessed. Suitable mitigation and management measures are secured through the oCTMP and subsequent CTMP process to ensure that construction traffic can be accommodated safely while minimising impacts on local communities and all users of the road network. |
| | In terms of traffic numbers and types of vehicles the will be a significant increase due to the solar farm development. The peak daily number of construction | The Applicant has given consideration to increased volumes of traffic. **ES Chapter 15: Traffic and Access** [APP-066] assesses the potential impact and likely significant effect of the Scheme on traffic levels during construction. The assessment concludes no significant effects are expected |

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| | staff, HGV deliveries and LGV for the whole scheme is shown o the table below:<br><br>Applying the split between 55% using the shuttle bus and 45% using cars (driver & passengers), the daily peak construction staff figures is shown in the table below:<br><br>Source: Outline Construction Traffic Management Plan (Meridian Solar Farm)<br><br>This represents a significant increase in traffic across the local area creating much disturbance to the local community. | with the implementation of mitigation measures included within the **OCTMP** [APP-278 & APP-279].<br><br>The Applicant notes the stakeholder's concerns regarding the forecast construction traffic associated with the Scheme and the potential for disturbance to local communities.<br><br>The Applicant acknowledges that construction of the Scheme will result in a temporary increase in traffic on parts of the local highway network. However, the likely traffic effects of the Scheme have been comprehensively assessed within ES **Chapter 15** [APP-066], including the forecast numbers of construction workers, HGVs and LGVs during the peak construction period. The assessment considered the magnitude of traffic increases, the characteristics of affected roads and receptors, and the resulting effects on road users and local communities.<br><br>Whilst the construction workforce and delivery requirements will generate additional traffic movements, the assessment concluded that there would be no significant effects on receptors within the study area with respect to severance, delay, pedestrian and cyclist amenity, or fear and intimidation as a result of construction traffic.<br><br>The Applicant also notes that the construction traffic forecasts presented within the oCTMP incorporate a number of mitigation measures, including shuttle bus services to accommodate55% of construction workers, thereby |

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| | | reducing the number of private vehicle trips on the local road network. The detailed arrangements for workforce transport will be secured through the CTMP and Construction Worker Travel Plan prior to construction commencing.<br><br>In addition, the Scheme has been designed with multiple access points to distribute construction traffic across the road network and avoid significant effects. The core working hours during construction are also timed so that the majority of traffic movements occur outside local road network peak periods, as set out in the **OCTMP** [APP-278 and APP-279].<br><br>Traffic management measures, including controls on construction traffic routing, timing and phasing, a Delivery Management System, workforce shuttle bus provision and compliance monitoring, are also secured through the **oCTMP** [APP-278 and APP-279] and would be implemented through the detailed CTMP secured by Requirement 15 of the **Draft DCO** (Doc Ref. 3.1 Rev 2).<br><br>The Applicant acknowledges that some temporary disturbances may occur during the construction phase as a result of increased traffic movements. However, these effects are temporary in nature, limited to the construction period and have been assessed within **ES Chapter 15** [APP-066]. The assessment concludes that, with the embedded and secured mitigation measures in place, the Scheme would |

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| | | not result in significant traffic and transport effects on local communities or the surrounding highway network. |
| | The proposal states that much construction work will take place during the drier months. This coincides with the harvest period. Annually over four months from July to October the harvest takes place. It covers maize, oil seed rape, vegetables, wheat and barley, and potatoes, onions, and sugar beet. The impact on traffic is immense. The increased traffic includes heavy farm vehicles including combines, tractors and trailers, much of it being contract farming. Time is frequently of the essence with work often extending into the early hours. This in an increase in the HGV traffic already using the roads. There is no indication in Meridian Solar's appreciation of the impact of the harvest on traffic movement. It is not to be under-estimated. | The Applicant has given consideration to increased traffic volumes and the suitability of the existing highway network throughout the construction period, including during seasonal agricultural activities. Measures to manage construction traffic are set out within the **oCTMP** [APP-278 and APP-279].<br><br>A Delivery Management System (DMS) will be implemented from the start of construction to regulate HGV arrivals through timed delivery slots, monitor compliance with approved routing arrangements and minimise the potential for congestion. Measures will also be implemented to ensure that construction vehicles do not queue back onto the surrounding highway network.<br><br>The Applicant acknowledges the stakeholder's concerns regarding the interaction between construction traffic and agricultural traffic during the harvest period. Agricultural activities within the local area can generate increased traffic movements between July and October, including combines, tractors, trailers, HGVs and other vehicles associated with harvesting operations.<br><br>The traffic surveys used to inform the **ES Chapter 15: Traffic and Transport** [APP-066] were undertaken during July, which falls within the harvest season. The baseline traffic |

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| | | data therefore reflects traffic conditions during a period when agricultural activity and associated vehicle movements were already present on the local highway network. Seasonal agricultural traffic has therefore been captured within the baseline conditions used to inform the assessment.<br><br>The effects of construction traffic have been assessed in **ES Chapter 15: Traffic and Transport** [APP-066]. The assessment concluded that the temporary increase in traffic associated with the construction of the Scheme would not result in significant effects on the local highway network.<br><br>In addition, the oCTMP includes measures to manage construction traffic routing, timing and phasing. The Scheme has also been designed with multiple access points to distribute construction traffic across the network and reduce pressure on individual routes. Temporary road closures, where required, are anticipated to be limited to minor unclassified roads with relatively low traffic flows and would be carefully managed to minimise disruption.<br><br>The Applicant therefore considers that seasonal agricultural traffic has been appropriately reflected within the baseline conditions and that the assessment conclusions remain robust. Through the detailed CTMP process, the Applicant will continue to engage with the highway authorities and relevant stakeholders to minimise interactions between |

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| | | construction traffic and agricultural operations wherever reasonably practicable. |
| | Case Study of Langary Gate Road The scale of the project overwhelms the transport infrastructure typical of the local Fenland landscape. Here a case study of Langary Gate Road which provides access to the solar development on Parcel D which illustrates the impact that the project proposes. Langary Gate Road is a narrow rural lane serving private residences, smallholdings and farm operations together with field access.<br><br>Traffic levels are low. For example, the 18 hour weekday flow is predicted to rise from 97 vehicles 236, a % increase of 243.2% (Table 15 Construction Traffic Impact page 90). Increased traffic will include vehicles for workers as well as HGVs and construction machinery. This is in addition to local traffic and agricultural vehicles and machinery.<br><br>There are 12 new field accesses proposed along the length of Langary Gate giving access to the solar development area which includes a substation, access roads and vehicle parking. Their construction will include highways work including passing places. | The Applicant has given consideration to narrow rural roads, passing points, traffic routing, access points, and passing places required for the Scheme during the construction, operational, and decommissioning phases. **ES Chapter 15: Traffic and Access** [APP-066] assesses the potential impact and likely significant effect of the Scheme on traffic levels during construction. The assessment concludes no significant effects are expected with the implementation of mitigation measures included within the **OCTMP** [APP-278 & APP-279].<br><br>**ES Chapter 15: Traffic and Access** [APP-066] assesses the potential impact and likely significant effect of the Scheme on traffic levels during construction. In terms of managing construction traffic, the **OCTMP** [APP-278 & APP-279] includes mitigation measures to limit the impact of the Scheme on the local highway network. This includes incorporating passing places where vehicles have a risk of interacting with Local Road Users on sections of carriageway which are not wide enough to permit two-way traffic. The Applicant anticipates temporary passing places will be required on Martins Road (see APP-014 Sheets 5&6) and Langary Gate Road (see APP-014 Sheets 9-12). A temporary passing place strategy is to be agreed with LCC. |

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| | There will also be the need to reconfigure the junction of Langary Gate and the B1166 (J14). to allow access to Langary Gate Road.<br><br>At Langary Gate Road there will numerous closures (each for a maximum of 6 weeks) together with temporary partial closure (i.e. one lane closed, two-way movements retained but managed), for the width of the street to facilitate the alteration of layout and street works. This will cause much disruption to local residents and other road users over the prolonged period of construction.<br><br>There are two villages close to Langary Gate Road: Holbeach Drove and Gedney Hill. Meridian's submission states that no construction traffic will route through villages. This is not true with regard to Holbeach Drove. The designated route from the A16 comes through J13 B1168 Holbeach Drove Gate/B1166 Drove Road Junction which is in the centre of Holbeach Drove. The submission also states that no HGVs for construction will pass through Gedney Hill. There is no information of how this will be managed. | The Applicant acknowledges concerns regarding the potential impacts and likely significant effects of construction traffic on local roads. A full and detailed assessment of traffic and transport effects, with particular regard to the construction phase, has been undertaken and is reported in **ES Chapter 15: Traffic and Access** [APP-066]. Traffic management and mitigation measures including construction traffic routing, timing, access arrangements and controls to minimize effects on the local highway network are detailed in the **OCTMP** [APP-278 & APP-279], which provides the comprehensive management framework requested.<br><br>Annex A – Access Design Information Table within the **OCTMP** [APP-278 & APP-279] provides further detailed information on the types of vehicles used and any proposed traffic management measures. The **OCTMP** [APP-278 & APP-279] assesses the junction between Langary Gate Road and the B1166, which will be used by a 6-axle Transformer (19.324m) AIL vehicle to transport construction equipment to the Scheme. The **OCTMP** [APP-278 & APP-279] concludes that potential traffic management measures may be implemented at the South of Langary Gate Road on the junction with B1166 to help facilitate AIL movements, but no reconfiguration of the junction will be required.<br><br>The Applicant will provide mitigation measures through the development of a Passing Place Strategy. Several of the |

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| | | access routes serving the site are existing single-track roads that currently accommodate very low traffic volumes. However, during the construction phase, traffic movements are expected to increase, particularly due to HGVs and other construction-related vehicles. This will require a strategic and safe approach to managing vehicle movements, ensuring safe passing opportunities and mitigating potential constraints associated with the existing road capacity. The strategy will consider routes including Back Bank, Martins Road, Langary Gate Road and Holbeach Drove Gate, ensuring that construction traffic can be accommodated without compromising road safety, local accessibility, or the operation of the surrounding highway network.<br><br>The Applicant acknowledges the concerns raised by MAG regarding increased traffic flows on Langary Gate Road. However, it should be noted that the high percentage increase in flows on this road expected as a result of the construction phase of the Scheme is primarily a consequence of the relatively low base traffic flows observed on the road during the traffic surveys undertaken in July 2025 (during the harvest season).<br><br>The baseline traffic flow on Langary Gate Road was recorded as 97 vehicle movements over an 18-hour period is equivalent to approximately 5 vehicles an hour. The forecast increase of 236 vehicle movements associated with the peak construction period equates to approximately 13 vehicles |

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| | | per hour. Consequently, the total forecast traffic flow on Langary Gate Road during the peak of the construction phase would be approximately 18 vehicles per hour, which is fewer than one vehicle every three minutes on average.<br><br>The Applicant acknowledges the concerns regarding the temporary partial closures on Langary Gate Road which would be required to complete the works associated with the Scheme. However, these temporary traffic management measures would be limited in duration, with individual closures lasting no more than six weeks. Throughout such periods, one lane would remain open to maintain managed two-way vehicle movements and preserve access for local road users. Given the low baseline traffic flows recorded on Langary Gate Road, the Applicant considers that disruption to local residents and businesses would be of an appropriately limited and temporary nature.<br><br>The impact of road traffic on Langary Gate Road has been assessed within **ES Chapter 15** [APP-066). The assessment concluded that there would be no significant effects on the road or its users during the construction phase with respect to severance, delay, pedestrian and cyclist amenity, or fear and intimidation.<br><br>In relation to Holbeach Drove, the Applicant notes the stakeholder's observation that traffic travelling from the A16 towards Langary Gate Road would pass through the B1168 Holbeach Drove Gate / B1166 Drove Road junction. This |

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| | | routing has been reflected in the Traffic and Access Assessment and the associated HGV routing strategy. The assessment concluded that the forecast traffic associated with the Scheme would not result in significant traffic and transport effects on the local highway network.<br><br>With regard to Gedney Hill, **Figure 15-3: HGV Routing Plan** [APP-161] shows the HGV routing plan and confirms that no construction HGV traffic is proposed to pass through Gedney Hill. Mitigation measures, including HGV routing controls, are outlined in the **OCTMP** [APP-278 and APP-279] and would be secured through the Detailed CTMP prior to the commencement of construction. These measures would include route management, driver inductions, monitoring and compliance procedures to ensure that construction traffic follows the approved routes.<br><br>The Applicant therefore considers that the effects of construction traffic on Langary Gate Road and surrounding communities have been appropriately assessed and that suitable mitigation measures are secured through the **OCTMP** [APP-278 and APP-279] and subsequent CTMP process to minimise disruption during the construction phase. |
| | Similar issues relate to Martins Road, Cloot Drove & Queens Bank. Also there are concerns about Hull's Drove including its condition and high accident rate. | The Applicant has given consideration to narrow rural roads, passing points, traffic routing, access points, and passing |

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| | Due to its poor condition Hull Drove has been closes to traffic twice in the past 2 years and is due to be closed again shortly due to resurfacing. This is in addition to adhoc repairs to cracks and potholes. The proposal to use Hulls Drove as a significant route for construction traffic. In MAG's view this presents an increased safety risk as compared to that which already exists. | places required for the Scheme during the construction, operational, and decommissioning phases.<br><br>The potential effects of construction traffic on the local highway network, including road safety, have been assessed in **ES Chapter 15: Traffic and Access** [APP-066]. This assessment considered traffic flows, road characteristics, existing collision data and the sensitivity of affected routes. As part of the Collision Data Analysis presented within **ES Appendix 15-4: Transport Assessment Note** [APP-251], the eastern section of Hull's Drove (between Martins Road and Holbeach Drove Gate) was identified as having a higher-than-average collision rate compared with national averages for rural roads and was therefore assessed as a high-sensitivity receptor for road safety purposes.<br><br>Notwithstanding this, the assessment concluded that the forecast volume of construction traffic associated with the Scheme would not give rise to significant effects on road safety or the operation of the local highway network. The assessment also concluded that, with the implementation of appropriate mitigation measures, construction traffic could be accommodated safely.<br><br>The Applicant acknowledges that Hull's Drove has been subject to maintenance works, temporary closures, and repairs in recent years. To address concerns regarding road condition, the **OCTMP** [APP-278 and APP-279] includes commitments to undertake pre-construction, during- |

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| | | construction and post-construction highway condition surveys on roads used by construction traffic. Any damage attributable to the construction phase would be identified in consultation with the relevant Highway Authority.<br><br>In addition, the **OCTMP** [APP-278 and APP-279] establishes measures to manage construction traffic, including HGV routing arrangements, traffic management measures, driver requirements, monitoring procedures, and controls on the timing and movement of vehicles. These measures are intended to minimise potential effects on local communities and highway users.<br><br>The Applicant therefore considers that the condition of Hull's Drove, its existing collision history, and the potential implications of construction traffic have been appropriately assessed. Suitable mitigation, monitoring and reinstatement measures are secured through the **OCTMP** [APP-278 and APP-279] to ensure that construction traffic can be accommodated safely during the construction phase.. |
| Road Condition Survey | Meridian Solar's submission proposes that some individual roads will be surveyed prior to the construction. It is our view that all roads in the construction area should be surveyed with maintenance plans specified in advance for the period of construction. The importance go this need is illustrated by the fact that Hull's Drove has been | The Applicant has given consideration to road surface conditions for the Scheme during the construction, operation, and decommissioning phases. As set out in the **OCTMP** [APP-278 & APP-279], road condition surveys will be carried out pre-construction, during construction and post-construction to identify any defects to highways assets |

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| | repaired several times in the past 2 years including road closure for lengthy periods. | and verges arising from the Scheme, with any necessary reinstatement works carried out accordingly.<br><br>The Applicant notes the stakeholder's comments regarding highway condition surveys and the maintenance of roads used by construction traffic.<br><br>The **OCTMP** [APP-278 and APP-279] sets out details regarding road condition surveys which would be undertaken prior to, during, and following construction on roads directly serving as access points to the Scheme and routes to be used by HGV or abnormal vehicles (AIL) during the construction phase. The scope of these surveys will be confirmed with the LHA prior to being undertaken. Where the post-condition surveys identify upgrades needed to remediate the construction phase then these works will be undertaken.<br><br>The Applicant acknowledges that some sections of the local highway network may be more sensitive to construction traffic due to existing road conditions, maintenance requirements or their rural nature. Consequently, the purpose of the pre-construction surveys is to establish a robust baseline of highway conditions and identify any existing defects or constraints. Ongoing monitoring during construction, together with post-construction surveys, will provide a mechanism to identify any deterioration attributable to Scheme traffic and ensure that appropriate |

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| | | remedial measures are implemented where required in consultation with the relevant Highway Authority.<br><br>The Applicant notes the stakeholder's reference to Hull's Drove and the maintenance works that have recently been undertaken on that route. The Applicant recognises that parts of the local highway network are subject to existing maintenance and repair requirements. However, these are existing highway conditions and are not attributable to the Scheme. Nevertheless, roads used by construction traffic, including Hull's Drove where relevant, would be subject to the survey and monitoring provisions set out within the oCTMP.<br><br>The Applicant therefore considers that the proposed programme of pre-construction, during-construction and post-construction highway condition surveys, together with the commitment to undertake any necessary remedial works, provides an appropriate mechanism to identify, monitor and address any construction-related effects on roads used by the Scheme. Detailed arrangements will be agreed through the CTMP, which is secured through the **Draft DCO** (Doc Ref. 3.1 Rev 2). |
| BESS | There is concern about fire risk, noise. visual appearance, flood risk and potential contamination to the water courses and aquifer in the event of a fire. It is essential that the guidance of the UK | The Applicant notes the comment. The location of the BESS has been informed by technical, environmental and safety considerations as part of the Scheme design process, as set out in **ES Chapter 3: Alternatives and Design Evolution** |

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| | National Fire Chiefs, or equivalent, is followed at the outset of construction, operation and decommissioning. There should be close liaison with the Lincolnshire Fire Brigade. It should be borne in mind that local fire stations as sparsely dispersed experienced in dealing with lower risk incidents. In particular it should be noted that Crowland fire station comprises a volunteer brigade. | [APP-054]. A band of scattered trees and scrubs is proposed around the BESS and 400kV substation to soften the visual impact of this infrastructure. This can be viewed in the **OLEMP** (Doc Ref. 7.16 Rev 1). The maximum height of the BESS is 20m, and is secured by the **Design Parameters** (Doc Ref. 7.4 Rev 2).<br><br>The appropriate management of fire risk remains a serious consideration for the Applicant and so the Applicant has instructed an **OBSMP** [APP-284] to minimise and manage this risk. The **OBSMP** [APP-284] 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 Rev 2) ) to be submitted at Deadline 1.<br><br>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 and impacts on flood risk are presented in Section 11.7 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1) and within **ES Appendix 11-4 Outline Drainage Strategy** [APP-227].<br><br>In response to statutory consultation feedback, the locations of substation compounds, BESS and other noise generating |

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| | | plant have been moved to minimise the operational noise effects identified in the PEIR. The assessment of operational noise effects is presented in Section 13.8 and Section 13.10 of **ES Chapter 13: Noise and Vibration** [APP-064].<br><br>Commitment to operational noise limits is presented in Section 13.9 of ES Chapter 13: Noise and Vibration [APP-064] and secured by requirements in the **Draft DCO** (Doc. Ref. 3.1 Rev 2). With these measures in place, no significant residual operational noise effects have been identified. |
| Pylon Corridor & Inter-Arrays | These are regarded as a visual intrusion on the landscape. This is particularly the case where the pylons are close the proposed NG Sub Station B where the overhead lines meet and cross. The Grid Connection introduces a typology that is out of scale and character with the flat, expansive and predominately horizontal qualities of the area. This concern is shared by Lincolnshire County Council and South Holland District Council. We believe that consideration should be given to under grounding both of overhead lines and inter-array connections. With regard to the overhead lines particular regard should paid to bird safety through collision particularly along the routes which are used by swans. | The concern regarding the potential for significant adverse landscape and visual effects is noted. **ES Chapter 12: Landscape and Visual** [APP-063] and associated figures and appendices provide a detailed assessment of residual landscape and visual effects and their significance.<br><br>The iterative design process and evaluation on the feasibility of underground cables and overhead transmission lines is described in **ES Chapter 3: Alternatives and Design Evolution** [APP-054]. Table 3-2 Comparison of potential environmental effects from the construction of an underground cable and an overhead line for the Grid Connection, states that "*for both landscape and visual receptors an underground cable would largely avoid the presence of permanent above ground infrastructure and is therefore expected to give rise primarily to effects associated with construction, and these would be temporary and localised* |

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| | | *in nature*". Paragraph 3.5.28 states that "*With due regard to the environmental effects, the receptors that may experience likely residual significant effects from an overhead line are landscape and visual receptors, and designated heritage assets due to changes to their setting. In relation to an underground cable solution, potential effects on buried archaeological deposits may be extensive depending on the location of the trenching. 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>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 Rev 1) to mitigate collision risk, in order to avoid significant adverse effects on bird populations associated with the Wash SPA / Ramsar using the area and this is secured in the **Design Parameters** (Doc Ref. 7.4 Rev 2) and the **OOEMP** (Doc Ref. 7.11 Rev 1). 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 Rev 1) and **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1). Further, the adoption of overhead lines aligns with the presumption from the government in support that they should be the preferred technology for electricity networks |

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| | | as set out at paragraph 2.9.21 of the NPS for Electricity Networks Infrastructure (EN-5). |
| Flood Risk | It is noted that the Environment Agency have yet to review the flood risk assessment. Aside from the direct impact on the solar farm itself, the indirect impact on the surrounding land and community should be assessed including the modelling of the potential impact of climate change. | The impact of the Scheme, including allowance for climate change, has been undertaken and is presented in **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3 Rev 2). |
| Summary | The Meridian Action Group is a local community group with over 730 members. Our membership is largely drawn from the locality of the proposed project. Our objective is to object to the proposed Meridian Solar Farm.<br><br>In doing so we have focused on three main subject areas: Loss of BMV land and the consequent threat to food security the impact on the local community impact on already poor infrastructure, particularly roads These are not the only areas of importance to us but for ease of research we have focused on our main areas of concern.<br><br>Loss of BMV land and the consequent threat to food security Our main objection to the proposed Scheme is the use of prime agricultural land recognised as Best and Most Versatile (BMV) for solar energy development. The land in South Holland is | This response is a summary of the points raised within the representation. Please see the Applicant's detailed responses to these matters in the rows above. |

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| | recognised as some of the highest quality in the Country. The local economy is based on agriculture and food production. As such the proposed scheme is detrimental to local community and economy. Nationally it threatens our food security.<br><br>In deciding an application for an order granting development consent, the Secretary of State "should ensure that applicants do not site their scheme on BMV land without justification. Where schemes are to be sited on BMV agricultural land the Secretary of State should take into account the economic and other benefit of that land" Para. 5.11.34 of EN-1)<br><br>It is our view that the site selection is flawed and is driven by the convenience of the proposed connection to the National Grid at Weston Marsh without regard to the loss of BMV land. Scant regard is given to the consideration of more suitable alternative locations. This is evidenced by the continued statement by Meridian Solar that it is not appropriate to avoid all BMV land given their proposals. This is only due to the fact that this particular site has been chosen in preference to other locations where the the planning guidance on BMV can be more readily met. | |

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| | The submission makes little or no reference to the importance of agriculture and related services to South Holland locally, nationally and internationally.<br><br>Food security is increasingly of importance to the UK, but we are less than 50% self-sufficient. Thus even a small (quoted less than 1%) reduction of agricultural land is not warranted when alternative options exist for solar electricity production e.g. roof tops, land which is not classed as BMV. As the recent wars in Ukraine and the Middle East have demonstrated the necessity and benefit of better food security, any future defence strategies should include these as an important consideration.<br><br>The Land Use Framework published by DEFRA in March 2026, reinforces the need to protect quality land from development: " Agricultural land use reflects a continuum of approaches balancing food production and other outcomes according to the strengths of the land.'<br><br>Meridian Solar acknowledge that Development of BMV Land is one of the Potential Main Issues for Examination (7.2). It is flagged red. It is the view of MAG that it is the most important issue before the Examination. It is our view that the Meridian Solar | |

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| | submission fails on the issue of site selection and the consequent loss of BMV land.<br><br>8.4 IMPACT ON THE LOCAL COMMUNITY<br>Meridian Solar's application for DOC underplays the significance of the project to the local area and its cumulative impact on the local community. The focus on the impact of the individual matters which together constitute the solar project as a whole mean that the overall impact is not holistically taken into account. The proposed project is one of the largest solar farms in the country. It covers an area of 1100 hectares comprising a solar generating station with associated infrastructure, including a co-located BESS, inter-array connection to link four parcels of land that form the Solar Development Area, and an up to 13 km overhead line Grid Connection running north towards point of connection at the planned Weston Marsh National Grid Electricity Transmission sub-station.<br><br>The area of quasi-industrial development spreads across thirteen towns and villages including: Crowland Postland Shepeau Stow Whaplode Drove Holbeach St Johns Holbeach Drove Gedney Hill Fleet Cowbit Weston Hills Weston Moulton Moulton Seas End | |

| Topic | Matter Raised | Applicant's Response |
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| | There is also impact on the surrounding area. For example workers travel routes extend to a 60 minutes travel distance<br><br>8.2 It is a rural area of flat fenland characterised by open views and big skies. The land use is predominantly agriculture on some of the richest high quality land in the country. Public transport is extremely poor with a high reliance on cars. The road infrastructure is significantly poor and has a backlog of repair need<br><br>This quiet peaceful environment is appreciated by local residents. A construction period of 4 years would have an adverse impact on the residents and the rural area, with a continuing impact over the 40 years of operation.<br><br>The impact on local residents due significant increased construction traffic, noise, visual impacts, wildlife disruption etc over a lengthy period during construction should not be underestimated. Most residents in the area value peace and quiet highly, hence choosing the area to live. The operational period of 40 years fundamentally transforms the topology of this rural area, bringing industrial characteristics. | |

| Topic | Matter Raised | Applicant's Response |
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| | 8.3 Also rural communities should not disproportionately bear the environmental and social burdens of large infrastructure projects that primarily/exclusively benefit urban areas or large corporations.<br><br>8.4 TRAFFIC & ACCESS Of particular concern to the local community is the large increase in heavy and frequent traffic causing significant and prolonged disturbance. The road network is poor and inadequate for such use. We also draw attention to the busy harvest period.<br><br>8.5 Many of the roads designated as transport links for the project are narrow and/or single carriageway roads, commonly bordered by dykes (ditches/drains, not suitable for heavy vehicles and machinery. Road condition is generally poor with many potholes and cracks, soft grass verges and shifting road surfaces leading to cracked and uneven surfaces. The area is subject to continuous subsidence and roads commonly break. Due to uneven road surfaces, vehicle damage is common, both to vehicle suspension and vehicles running into adjacent ditches (dykes) and drainage systems. Road Traffic Accidents are common particularly on Hulls Drove which acts as one of the main spines providing access to the solar panel areas. Another, the Barrier | |

| Topic | Matter Raised | Applicant's Response |
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| | Bank to Crowland Road(former A1073( proposed to be used for access to land Area 1 and to the BESS site has been closed to traffic due to cracking and subsidence, deemed to be unsafe for traffic. It has been closed for 10 months at May 2026 with no indication of when it will reopen with neither a plan or budget.<br><br>8.6 There is also concern locally about the significant number of vehicles particularly HGVs and Large Indivisible Loads. Together with regular temporary road closures the increase in traffic will cause prolonged disturbance to local residents. For instance Parcel D will effectively become a large building site for the duration of construction. Its location, at the extreme distance from the main transport link of the A16 means that the disturbance to the many rural settlements based on the poor road infrastructure is intensified.<br><br>8.7 in short the road infrastructure is to totally unsuited to the the traffic needs of the Meridian Solar project.<br><br>CONCLUSION Meridian Solar is a massive quasi industrial project totally unsuited to the Fens primarily due to the loss of BMV land so threatening food security the adverse impact on residents, the Fen landscape and wildlife the inadequate road | |

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| | infrastructure which is totally unsuited to the significant increase in amount and type of traffic related the construction of solar farm. Not only does this impact on the local community and area it also threatens road safety. | |

## 5.8. Outer Dowsing Offshore Wind

5.8.1. Table 5-8 below sets out the Applicant's response to the issues raised within the Relevant Representations from Outer Dowsing Offshore Wind [RR-147] including signposting to the relevant sections of the DCO Application.

**Table 5-8: Outer Dowsing Offshore Wind**

| Topic | Matter Raised | Applicant's Response |
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| General | I write on behalf of GT R4 Limited, developer Outer Dowsing Offshore Wind (the Project). The Project is a consented offshore wind farm with an onshore grid connection and associated cable corridor.<br><br>The Project will be one of the UK's largest offshore wind farms upon completion, generating renewable electricity equivalent to the annual electricity consumption of over 1.6 million households, playing a critical role in bolstering UK energy security and independence, reducing emissions and creating thousands of skilled UK-based jobs during the construction phase and hundreds of jobs for the Project's 30+ years of operations. The Project has been identified as Critical National Priority infrastructure, for which there is an urgent need.<br><br>The Project's grid connection point into the National Electricity Transmission System is in close proximity to that proposed by the Meridian Solar project and therefore the Project is registering as an Interested Party.<br><br>The Project does not object to the proposal but wishes to ensure that it has the ability to comment and identify any | Noted. The Applicant will continue to engage with Outer Dowsing Offshore Wind regarding potential interfaces and cumulative impacts. |

| Topic | Matter Raised | Applicant's Response |
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| | potential interfaces for which it may require appropriate protection. It is also possible that the proposed development gives rise to potential cumulative impacts that need to be managed. | |

## 5.9. R Longstaff & Co LLP Rural Ltd

5.9.1. Table 5-9 below sets out the Applicant's response to the issues raised within the Relevant Representations from R Longstaff & Co LLP Rural Ltd who represent a number of affected landowners and have submitted the same relevant representation for multiple landowners and occupiers (see (RR-041, RR-046, RR-062, RR-099, RR-104, RR-119, RR-121, RR-124, RR-145, RR-153, RR-160), including signposting to the relevant sections of the DCO Application.

**Table 5-9: R Longstaff & Co LLP Rural Ltd Example Table**

| Topic | Matter Raised | Applicant's Response |
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| 1. Obstruction of watercourses | It is a legal responsibility for owners, or Internal Drainage Boards to ensure that watercourses are free to flow whether this be by way of maintenance of individual and privately owned watercourses, or by way of an Internal Drainage Board responsible for multiple Board Assets and this is a legal obligation as such it needs to be ensured that no works or development undertaken inhibit this responsibility and legal requirement. | 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 Rev 2), in accordance with the Planning Act 2008 regime.<br><br>The Applicant is engaging with the IDBs 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. |
| 2. 9m by-law zone | An Internal Drainage Board has the legal right to a 9m by-law zone on either side of a designated IDB watercourse and as such any development or works must not inhibit | The Applicant recognises that the Scheme is located within the districts of South Holland IDB and North Levels IDB, and that the Boards' byelaws and consenting regimes apply unless otherwise disapplied. |

| Topic | Matter Raised | Applicant's Response |
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| | the ability to maintain or pass with machinery over the 9m zone | 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 Rev 2), in accordance with the Planning Act 2008 regime.<br><br>The Applicant is engaging with the IDBs 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.<br><br>The **OCEMP** (Doc Ref. 7.10 Rev 2) requires the implementation of a 10m stand-off distance for all works, where reasonably practicable. Where this is not possible (e.g. in the case of watercourse crossings or drainage outfalls), prior approval from the IDBs would be sought in accordance with the Protective Provisions.<br><br>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><br>The FRA is included as **ES Appendix 11-3** (Doc Ref 6.3 Rev 2), and the Outline Drainage Strategy is included as **ES Appendix 11-4** [APP-227]. |

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| | | The Applicant can confirm that it has produced an OCEMP (Doc Ref. 7.10 Rev 2), OOEMP (Doc Ref. 7.11 Rev 1), ODEMP (Doc Ref. 7.12 Rev 1), and an Outline Drainage Strategy [APP-227], which would be secured under of the requirements within the **Draft DCO** (Doc Ref. 3.1 Rev 2), to minimise effects on watercourses. Further, the above documents will require the implementation of:<br>• Sediment management;<br>• Sustainable Drainage Systems (SuDS);<br>• Pollution control measures. |
| 3. Haul roads | The construction of any haul roads or access roads mut be in a suitable and agreed locations agreed with the land owner and/or occupier. It is essential that and roadways do not sever land or inhibit agricultural practices.<br><br>The construction of any haul roads or crossing points over watercourses must be constructed in agreement and in consultation with the owner and/or occupier.<br><br>It is noted that there are to be haul roads over the occupied land, full details of the construction of these will need to be agreed and robust procedures put in place whereby if stone is being used it does not contaminate the Land at any point including the removal as stone contaminated soil will not be compatible with the cropping and have a large impact on the land value. | Construction access has been identified from the public highway network into land where the Project will be constructed, via temporary site access points (bellmouths). The accesses have been designed to minimise their length where possible, to route adjacent to the proposed OHL to allow for continued offline access and to cross watercourses as perpendicular as possible in order to reduce the width of any crossings and therefore disruption to watercourses. Within the Grid Connection Route, internal construction accesses will typically be 4m in width, increasing to 8m at passing places and consist of stone surfacing, all located within a 21m swathe which allows flexibility for siting the construction access route. Further information can be found in **ES Chapter 15: Traffic and Access** [APP-066] and **OCTMP** [APP-278 to APP-279], and a typical layout of a site |

| Topic | Matter Raised | Applicant's Response |
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| | If topsoil stripping was to be undertaken for the haul road, it will need to be ensured that soil handling protocol and procedures are followed and the top soil is stored is separately from subsoils and is able to be reinstated in a suitable way. | access point and stone haul road can be found in **Indicative and Illustrative Layout Plans and Sections - Section B Grid Connection** [APP-019]. Indicative access designs for each of the proposed access points are also appended to the **OCTMP** [APP-278 to APP-279]. All construction accesses will be determined and refined during the detailed design phase. Following completion of the works, all site access points and construction haul roads would be reinstated, returning land back to its previous use. New culverts would be reinstated and any existing culverts upgraded for the works would be left in place to enable the landowner to continue to access their adjacent land parcels.<br><br>The Applicant notes the stakeholder's concerns regarding construction traffic, road access, potential effects on neighbouring land and businesses, and the risk of land severance during construction.<br><br>The Applicant agrees that unnecessary severance should be avoided. Temporary working areas, construction accesses, haul routes and traffic management measures will be designed to minimise disruption to existing landholdings and farming operations as far as reasonably practicable. Where temporary effects cannot be avoided, appropriate mitigation measures will be implemented to maintain access and connectivity during construction.<br><br>In relation to effects on neighbouring businesses, retained land and farming operations, the Applicant recognises the |

| Topic | Matter Raised | Applicant's Response |
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| | | importance of maintaining reasonable access throughout construction. Detailed construction planning will seek to maintain access wherever reasonably practicable and will continue to be informed by engagement with affected landowners and occupiers.<br><br>The **OSMP** (Doc Ref. 7.14 Rev 1) 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 Rev 1), 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>Haul roads are set out in the Scheme design, but discussions will take place between landowners and their agents in regard to the positioning of haul roads within the Order Limits, in order to limit the impact of the Scheme, as far as practicable. The Applicant will be discussing accommodation works with Agents and Landowners as appropriate. Losses |

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| | | will be reimbursed subject to appropriate evidence in accordance with the Compensation Code.<br><br>In regard to construction of the haul roads, the need to confine the stone will be fed to the EPC contractor and the Scheme's land agency team will work with the landowner, their agent and contractor. A Record of Condition will be taken prior to any works, and the land will be reinstated in conjunction with this record. Any losses incurred will be reimbursed subject to appropriate evidence in accordance with the Compensation Code. The **OSMP** (Doc Ref. 7.14 Rev 1) has also been updated at Deadline 1 to clarify that once temporary working areas and haul roads are no longer required, the land will be reinstated including removal of any stones. Alternative methods of soil stabilisation to avoid stoning of soils will be considered and, if adopted, appropriate methods of reinstatement will be included in the detailed Soil Management Plan and applied. |
| 4. Pylons | It is unknown and should be explained why the chosen method of cable placement is by way of overhead lines as opposed to below ground. It is noted that whilst the project may be designated as an NSIP, it is a private 'for profit' scheme, as opposed to a scheme being developed by a utility provider such as National Grid Electricity Transmissions.<br><br>Above ground cables, by way of pylons inhibit the landscape, and create practical issues with farming, to | The adoption of overhead lines aligns with the presumption from the government in support that they should be the preferred technology for electricity networks as set out at paragraph 2.9.21 of the NPS for electricity networks infrastructure (EN-5).<br><br>The iterative design process and evaluation on the feasibility of underground cables and overhead transmission lines is described in **ES Chapter 3: Alternatives and Design** |

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| | include, infield obstructions, issues with irrigation, issues with safety with large vehicles passing under (particularly in hot weather). The full extent of the reasoning for over ground cabling needs to be identified and reasoned, and this should not be acceptable due to the cost saving of above ground, versus below ground installations | **Evolution** [APP-054]. Table 3-2 Comparison of potential environmental effects from the construction of an underground cable and an overhead line for the Grid Connection, states that "*for both landscape and visual receptors an underground cable would largely avoid the presence of permanent above ground infrastructure and is therefore expected to give rise primarily to effects associated with construction, and these would be temporary and localised in nature*". Paragraph 3.5.28 states that "*With due regard to the environmental effects, the receptors that may experience likely residual significant effects from an overhead line are landscape and visual receptors, and designated heritage assets due to changes to their setting. In relation to an underground cable solution, potential effects on buried archaeological deposits may be extensive depending on the location of the trenching. 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>The overhead line has been designed to a minimum clearance of 8.5m from the conductors to the ground; a value of which exceeds the minimum statutory requirements as set out in the 'The Electricity Safety, Quality and Continuity Regulations 2002 (ESQCR 2002)' and by the 'ENA Technical Specification 43-8' (due to the absence of LIDAR data), which allow for the passage of high-sided vehicles |

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| | | underneath. As per ENA Technical Specification 43-8, safe systems of work are expected to be implemented by third parties whenever they intend to work near overhead lines, including passage of plant or vehicles exceeding the basis of the overhead line design and also use of irrigators, slurry guns and high-pressure hoses in the vicinity of an overhead line. In most clearance, OHL clearances to ground would be even greater due to variations in ground level and because the minimum clearance is typically towards the middle of the span and increases closer to the pylons on either side. |
| 5. Location of pylons | The proposed location of pylons must not interfere with protected internal drainage board areas. | **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1), Table 11-10 lists out eight locations where temporary works for pylons would encroach within a 10m buffer of SHIDB watercourses (and therefore also the 9m buffer stated within the IDB's byelaws), in addition to any works associated with watercourse crossings. However, any encroachment would only be required for temporary works, and would be agreed with the IDB following detail design in accordance with the Protective Provisions. No permanent pylon structures are proposed within 9m of an IDB watercourse. |
| 6. Pylon Distance from Edge of Field | If the Scheme is to utilise above ground cabling the location of any pylons needs to be fully considered to ensure that there placement is as such on the edge of fields to allow agricultural activities around them to prevent severance of fields and creating unfarmable areas, | During development of the design of the overhead line, consideration was given to the siting of pylons in agricultural fields whilst balancing overhead line span lengths and keeping pylon heights to a minimum. Where possible, pylons were sited more than 30m away from field boundaries to |

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| | or place in such a way to minimise impacts to the remaining farmed agricultural area. | allow farm machinery to pass between the field edge and the pylon legs, or were sited as close to the field boundary as possible to minimise any sterilisation of land between the pylon and the boundary if requested. The pylon locations were presented at the Statutory Consultation events held during the design development phase of the Scheme. Feedback was received by certain landowners requesting for some pylons to move in order to reduce impacts on farming practices. These change requests were reviewed and incorporated into the design.<br><br>The siting of pylons within the illustrative design has been carefully considered to minimise impacts on landowners with regards to the severance of agricultural land. Pylons have been located sensitively to minimise vegetation loss, retain hedgerows, have stand-off from field drains and to reduce the potential impact on agricultural practices. Further information on the design is provided within the **Design Approach Document** [APP-268]. |
| 7. Pylon foundations | We are unaware as to the extent of the pylon foundations both in terms of horizontal size and vertical depth and whether this will interfere with land drainage. | Each leg of the pylon would be supported by foundations that will be designed according to ground conditions, soil types and following intrusive ground investigations during the detailed design stage. During this and the construction phase, pylons could move laterally within 50m of the proposed centreline, or longitudinally (on the centreline), therefore, the pylons designs may be subject to change which will impact foundation design and footprint in which |

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| | | the occupy below ground, and the above ground area between the pylon legs.<br><br>Paragraph 2.8.3 of **ES Chapter 2: The Scheme** [AS-017] provides worst-case design assumptions used to inform the preparation of the ES with regards to the requirements for pylon foundations.<br><br>Furthermore, the **OCEMP** (Doc Ref. 7.10 Rev 2), Table 3-6 outlines the following measures for the protection of existing land drainage:<br><br>• Any subsurface land drainage encountered during construction will be avoided or rerouted where reasonably practicable or an alternative drainage solution provided if required. Where any subsurface land drainage is crossed by Scheme's infrastructure, the Applicant will use the relevant best-practice construction methodology to ensure the integrity and functionality of the land drainage is protected. In the event of damage, it will be reinstated or an alternative drainage solution will be provided.<br><br>With these measures in place, no significant effects on existing land drainage are considered likely. |
| 8. Underground Cables | It is noted that there is to be underground cables. It must be ensured that any invasive work requiring disturbance to soil will require a soil handling and reinstatement | Any losses incurred will be reimbursed subject to appropriate evidence in accordance with the Compensation Code. Please refer to **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 |

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| | protocol with onward compensation where there is damage to soil, soil structures and drainage. | Rev 1) and the **OSMP** (Doc Ref. 7.14 Rev 1) for further information in regard to soil handling . |
| 9. Width of Permeant Easement | We are informed that the permanent easement is to be 50 meters wide as at the pylons. Due to the large with of the easement, confirmation as to prohibited actions within eh easement need to be identified and ratifies, and also, the easement size reduced to a minimum required width. | In terms of the OHL easement, currently the proposed 400kV OHL has a 50m lateral limits of deviation (LoD) which allows flexibility for offline movement during the detailed design and construction phase. Once the OHL has been constructed, the final easement and thus rights to be obtained for the OHL will be refined based on the as-built configuration. |
| 10. Landowner Crossing Rights | Landowners need to be given assurance that there will be no prohibition on crossing rights of any form to include other schemes cables and assets over or under Meridian easement as this could negatively affect land and land values as well as future schemes. | The Applicant is engaged with individual landowners and/or their Agents on this point. |
| 11. Layout Plan and Details for Connection to Weston Marsh Substation | No firm detail has been received, or seen to be published as to how Merdian Scheme is to connect into Weston Marsh substation. Therefore no certainty as to who will be affected and how. | The Weston Marsh B Substation would be developed and delivered by National Grid Electricity Transmission (NGET), who recently consulted on its proposals for the substation in late 2025 as part of its Grimsby to Walpole project. As this design is subject to refinement, the Applicant does not have confirmation of exactly how it would connect into the Weston Marsh B Substation and, as a result, has sought an appropriate degree of flexibility near the substation to allow for the overhead line to be routed into the ultimate point of connection, this could include undergrounding if necessary. |

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| | | The Applicant has provided a worst-case assessment within its Environmental Statement. |
| 12. Land Drainage | No details has been seen or method statement as to how affects to land drainage schemes is to be treated and mitigated. Also no detail seen as to proposed land drainage to deal with effects of developed scheme. It is critical to protect affected agricultural land that this is agreed and fully addresses.<br><br>It is noted that there are several points where there is to be apparatus into the sub-soil such as the permanent cable as well as temporary assets such as the sustainable drainage system basins, the land benefits from a land drainage scheme and it is therefore important that any equipment which severs or interferes with land drainage, there is a full and approved system designed to ensure suitable future onward drainage of the land. | The **OCEMP** (Doc Ref. 7.10 Rev 2), Table 3-6 outlines the following measures for the protection of existing land drainage:<br><br>• Any subsurface land drainage encountered during construction will be avoided or rerouted where reasonably practicable or an alternative drainage solution provided if required. Where any subsurface land drainage is crossed by Scheme's infrastructure, the Applicant will use the relevant best-practice construction methodology to ensure the integrity and functionality of the land drainage is protected. In the event of damage, it will be reinstated or an alternative drainage solution will be provided.<br><br>With these measures in place, no significant effects on existing land drainage are considered likely. |
| 13. Access Tracks (Temporary and/or Permanent) | Full and agrees details of the material and methods for laying and use of any temporary or permanent tracks need to be provided and agreed, to include reinstatement of temporary tracks after construction. | The Applicant is engaged with individual landowners and/or their Agents on this point. |

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| 14. Road Access during Construction | It is noted that access to sites is via are narrow country roads. There needs to be a defined and approved vehicle management plan to address the number of construction vehicles that will be imposed upon the roads and also mitigation put in place as to how we ensure that there is not detrimental effects to neighbours, their businesses and retained land.<br><br>It is informed that there will be a vast increase in car movements and construction traffic during the construction period and as such mitigation needs to be demonstrated and there will be effects on the business. | See response to 3. Haul Roads. |
| 15. Severed Area During Construction | Measures need to be adopted at the design stage to ensure land is not severed, either by any working corridor, or tracks at construction. | See response to 3. Haul Roads.<br><br>All endeavours will be made wherever possible to ensure access to severed areas and we will agree accommodation works with agent and landowners wherever possible. Any losses will be reimbursed subject to appropriate evidence in accordance with the Compensation Code. |
| 16. Environmental screening and landscaping | Details of the landscaping works are required as landscaping such as trees and hedgerows harbour vermin such as pigeons and rabbits which can affect growing crops on the remaining agricultural land. | The concern regarding the potential for the proposed landscape mitigation to harbour vermin and adversely affect adjoining agricultural land is noted. The proposed bands of shrubs and trees are intended to provide visual screening and support landscape integration of the Scheme and would |

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| | | be designed and maintained as described in the **OLEMP** (Doc Ref. 7.16 Rev 1) throughout the lifetime of the Scheme. The landscape mitigation planting would not become an unmanaged or overgrown vegetation. While proposed vegetation may provide additional habitat for wildlife and increase biodiversity, there is no basis to conclude that the proposed planting would result in an unacceptable increase in pigeons, rabbits or other vermin, or cause a material adverse impact on crop production. The proposed landscape mitigation is therefore not anticipated to adversely affect adjoining agricultural operations in this regard. |
| 17. Surveys | As at the time of writing there has been no consultation, or information provided as to intrusive surveys, to include:<br>• What surveys are required<br>• When they will be undertaken<br>• How occupation will be recoded<br>• Draft agreement<br>This information needs to be provided wholesale and as soon as possible. | Intrusive surveys will be required, however, plans for such will be available post determination. Intrusive surveys may comprise archaeological investigation works, soil sampling, and ground investigations, including trial pits, boreholes, dynamic cone penetration testing (for haul roads) and infiltration testing. The Applicant would confirm the exact scope of the surveys for each land parcel and their timing during detailed design development post-DCO consent. It is intended as part of the negotiations with Affected Person(s) that this information is shared to agents and landowners directly and where required discussed with the Land Interest Group. |

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| 18. Crop loss and effects on agricultural practices and property | During works crop loss will need to be compensated details to mitigate injurious affection and disturbance will need to be provided prior to works and agreed.<br><br>Any effects on land drainage schemes will need to be presented and agreed as will repairing and reinstatement of the same.<br><br>Any residual reduction in value to the asset will need to be compensated for. | Any crop loss and other losses will be reimbursed subject to appropriate evidence in accordance with the Compensation Code. Prior to works being undertaken the land agency team will agree accommodation works with Landowners and their Agents. |
| 19. Soil structure | Any invasive work requiring disturbance to soil will require a soil handling and reinstatement protocol with onward compensation where there is damage to soil and soil structures. | The **OSMP** (Doc Ref. 7.14 Rev 1) 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 Rev 1), 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. |
| 20. Drainage Basins and/or | • It is presumed that there may be are to be sustainable drainage system basins which may be | The Applicant notes that attenuation features will be lined with an impermeable membrane, with regards to the 400kV |

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| Attenuation Ponds | stone lined. Further details of these are required and we would raise comment that lining with stone will decrease water storage capacity and precautions will need to be put in place to ensure that the good quality arable land does not become contaminated with stone which will be impossible to remove in totality and if not removed, have a large impact on land value.<br>• It will also be necessary to consider and provide a resolution as to how compaction created by way of water and stone is to be alleviated from the bottom and surrounding subsoil areas of the ponds.<br>• It is presently unknown how deep the ponds will be and whether these are going to interfere with land drainage systems and if so, how this issue will be mitigated | Substation and BESS attenuation. The attenuation feature will not include gravel, the BESS areas and substation areas are currently assumed to contain gravel in the build-up. The impermeable lining for SuDS will typically be overlain by a geotextile layer around 100mm depth which in turn will be overlain by approximately 300mm of topsoil. The build-up to the topsoil will be at the design invert of the basin, there will be no loss of designed attenuation within SuDS features.<br>Swale membranes that can withstand potential pollution incidents from fire water runoff are typically HDPE, which are generally joined by heat welding, or EDPM membranes which are tape sealed. They can be easily repaired if removal is required due to contamination after a fire.<br>Where gravel is used within substation or BESS areas following an incident, the gravel will be tested and hand dug to remove all contaminated gravel, and reinstated with clean, inert gravel. If the liner is damaged beneath the gravel it will be patch repaired in line with the proprietary manufacture requirements, to prevent any future risk of contamination to ground.<br>Any gravel used will be when a liner is also present with no risk of gravels passing through the liner and being lodged in subsoil during operation or decommissioning.<br>The **OSMP** (Doc Ref. 7.14 Rev 1) has also been updated at Deadline 1 to clarify that land will be reinstated including |

| Topic | Matter Raised | Applicant's Response |
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| | | removal of any stones. Alternative methods of soil stabilisation to avoid stoning of soils will be considered and, if adopted, appropriate methods of reinstatement will be included in the detailed Soil Management Plan and applied.<br><br>Regarding compaction in bullet point 2, the detailed design and construction methodology for the SuDS basins and substation and BESS Areas will be developed post-DCO consent. The detailed design will ensure that construction activities associated with the formation of the basins and platforms, including the placement and compaction of stone and other materials, do not result in adverse compaction of the underlying or surrounding subsoil that could affect the long-term performance of land drainage.<br><br>Appropriate construction methods, sequencing and measures to protect the subsoil will be specified at detailed design stage, including consideration of plant access, working platforms and the required treatment of the basin base and side slopes. Where necessary, measures to alleviate any localised construction-related compaction will also be incorporated into the construction methodology.<br><br>Regarding the final bullet point, paragraph 5.8.7 of **ES Appendix 11-4: Outline Drainage Strategy** [APP-227], confirms the firewater / attenuation basin will be 0.9m deep, including a freeboard allowance of 0.3m (i.e. an attenuation depth of 0.6m). Swale features will have a depth of 600mm. |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | | If land drainage is encountered during construction of the SuDS features, it will be locally remediated to ensure existing land drainage within the area of swales and attenuation SuDS is not adversely impacted. |
| 21. Land drainage | The land being crossed benefits from a comprehensive land drainage scheme, any construction work will need to ensure that any effects to land drainage schemes are mitigated and will need to be presented and agreed as will repairing and reinstatement of the same | The Applicant is engaging with IDBs 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.<br><br>If land drainage is encountered during construction of the SuDS features, it will be locally remediated to ensure existing land drainage within the area of swales and attenuation SuDS is not adversely impacted. During decommissioning, if any land drains are damaged during this phase, they will be reinstated, to best endeavours, to the original layout and operation. |
| Conclusion | As per the comments at the beginning of this letter, we are frustrated by the lack of engagement regarding the outstanding queries and therefore, submit this letter by way of a holding representation until further information can be provided.<br><br>The overriding issue which needs to be given sound reason, and not just financial or economic reason it the | Noted. The Applicant has been regularly engaging with R Longstaff & Co LLP Rural Ltd on land and compulsory acquisition matters, including the points raised within this relevant representation. The status of negotiations with individual landowners will be captured within the **Land Rights Tracker** (Doc Ref. 4.4 Rev 2).<br><br>The Applicant has set out its justification for the use of overhead lines within **ES Chapter 3: Alternatives and Design** |

| Topic | Matter Raised | Applicant's Response |
|---|---|---|
| | application to install overhead power lines as opposed to underground. | **Evolution** [APP-054], the **Design Approach Document** [APP-268] and the **Planning Statement** [APP-260].<br><br>A guiding principle of the Applicant's design for the transmission infrastructure is the "*government's position that overhead lines should be the strong starting presumption for electricity networks developments in general*" as stipulated within paragraph 2.9.21 of EN-5. This presumption is reversed when a proposed development will cross part of a nationally designated landscape. The Scheme does not cross part of a nationally designated landscape, and therefore this strong starting presumption in favour of overhead lines remains applicable. In any case, **ES Chapter 3: Alternatives and Design Evolution** [APP-054] considers alternatives in line with paragraph 2.9.14 and 2.9.15 of EN-5 and concludes that an overhead line remains appropriate. |

# 6. Applicant's Response to Thematic Issues Raised by Members of the Public, Landowners and Businesses

## 6.1. Overview

6.1.1. The tables below set out the thematic issues raised in the Relevant Representations from members of the public, landowners and businesses and the response from the Applicant.

## 6.2. Agricultural Land

6.2.1. Table 6-2 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Agricultural Land including signposting to the relevant sections of the DCO Application.

**Table 6-2: Agricultural Land**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern about Food Security | The UK Government Food Security Report, 2024, identifies that the UK is broadly maintaining its level of total utilised agricultural area. The UK government expects there to be increases in land use change, including to economic infrastructure, specifying the energy sector as an example. The report indicates that food production levels could be maintained or moderately increased alongside this land use change. Climate change is recognised as the greatest medium to long term risk to the UK's domestic food production, and solar farms contribute to addressing this risk.<br><br>In addition, solar farms can continue to support agricultural activities, including grazing, and can support UK farmers in maintaining food production on other parts of their land. Section 5.6 of the **Outline Landscape and Ecology Management Plan (OLEMP)** (Doc Ref. 7.16 Rev |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | 1) recognises the potential for the land around the solar panels to remain in agricultural use for sheep grazing during operation of the Scheme, although this will depend on local availability/expertise in doing so.<br><br>Taken in isolation, the Scheme represents less than 1% of the agricultural land available in Lincolnshire. Furthermore, as set out within Section 5.11 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1), it is estimated that cumulative solar projects in Lincolnshire, together with the Scheme, 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 across the identified solar projects. This is indicative that solar schemes represent a small proportion of agricultural and BMV land in the County.<br><br>On this basis, cumulative effects on agricultural land, food production and food security are assessed as not significant. |
| Agrivoltaic & Vertical Bifacial Panels Suggestion | South-facing fixed-tilt solar panels represent the established and most efficient design for utility-scale solar developments in the UK, maximising annual electricity generation from a given site. By orientating panels towards the south at an optimal tilt angle, the Scheme captures the greatest amount of solar irradiance over the course of the year, resulting in higher energy yields than alternative configurations such as vertical bifacial systems. This enables the Scheme to generate more renewable electricity from the same land area, improving the overall efficiency of the Scheme and making a greater contribution towards national renewable energy and net zero targets. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | The higher energy density achieved by south-facing arrays also reduces the land take required per unit of electricity generated. To achieve the same generating capacity using lower-yield technologies, a larger site or a greater number of panels would typically be required, potentially increasing environmental effects and development costs. Optimising energy output from the Site therefore represents an efficient use of land and infrastructure.<br><br>South-facing arrays also benefit from a long-established design and operational track record within the UK. Their performance characteristics are well understood, enabling robust prediction of energy generation, maintenance requirements and long-term operational performance. Vertical bifacial panels, and agrivoltaics generally, are less well understood and have not been developed at scale in the UK to date.<br><br>While alternative configurations, including vertical bifacial panels, may offer advantages in specific circumstances such as agrivoltaic applications or altered generation profiles, the primary objective of the Scheme is to maximise the generation of low-carbon electricity. In this context, south-facing fixed-tilt panels represent the most appropriate and effective design solution, balancing technical performance, commercial viability and efficient use of land. |
| Concern about Loss of Prime Agricultural Land | The Applicant has undertaken a three-stage approach to site selection for the Solar Development Area, comprising: Stage one: Identifying the opportunity area; Stage two: Consideration of constraints and opportunities; and Stage three: Solar Development Area site selection. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | Further details about the site selection process, including the consideration of reasonable alternatives, can be found in **ES Chapter 3: Alternatives and Design Evolution** [APP-054] and **Appendix D: Site Selection Report** of the **Planning Statement** [APP-264]. As set out within paragraph 3.3.26 of **Appendix D: Site Selection Report** of the **Planning Statement** [APP-264], there is no land of sufficient scale for a 750MW solar farm that is located within proximity to the point of connection, which does not have a high likelihood of BMV land, making complete avoidance of BMV agricultural land near impossible for the Scheme.<br><br>The siting and design of the Scheme infrastructure have avoided BMV land wherever practicable, and where BMV land is adopted for elements of the Scheme, this has been clearly assessed within the ES and weighed as part of the overall planning balance presented in the **Planning Statement** [APP-260]. Temporary and reversible land take has been maximised, and long-term use of BMV land for solar stations, substation, BESS and pylon foundations has been minimised as far as feasible. The Scheme's design was also developed so as to allow areas of BMV land to be retained as farmed areas without infrastructure. Land within the Order Limits to be retained in agricultural production will be farmed with agricultural practices adopted to provide additional ecological enhancement.<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 Rev 1), it is estimated that cumulative solar schemes in Lincolnshire will account for approximately 3% of all agricultural land within Lincolnshire. An |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | estimated 1.1% of BMV land would be temporarily used and 0.02% of BMV land permanently used. Whilst these figures are estimates, they are indicative of the position 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.<br><br>The results of ALC surveys are reported in **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1). Good practice environmental management measures have been set out within the **Outline Construction Environmental Management Plan (OCEMP)** (Doc Ref. 7.10 Rev 2), **Outline Operational Environmental Management Plan (OOEMP)** (Doc Ref. 7.11 Rev 1) and **Outline Decommissioning Environmental Management Plan (ODEMP)** (Doc Ref. 7.12 Rev 1). 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. The **Outline Soil Management Plan (OSMP)** (Doc Ref. 7.14 Rev 1), outlines a comprehensive set of measures across the lifetime of the Scheme for the preservation of the soil resource within the Order Limits, avoiding both the loss of soil material from the Order Limits and the loss of soil functional capacity for soil retained within the Order Limits. |
| Concern that agricultural land would never be returned to agriculture following decommissioning | The operational life of the Scheme is 40 years and decommissioning is estimated to commence in 2073. Decommissioning would be completed within 24 months, providing flexibility to avoid wet periods when soil is |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | most vulnerable to damage. Following decommissioning, land within the Order Limits would be returned to the relevant landowners and capable of being returned to agricultural use. All above-ground physical infrastructure would be dismantled and removed during the Decommissioning phase, including pylons and associated infrastructure. In addition, below ground infrastructure, such as 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><br>Prior to the start of the Decommissioning phase, a detailed DEMP will be prepared, submitted to and approved by the local authority and is secured by the **Draft DCO** (Doc Ref. 3.1 Rev 2). This will be in substantial accordance with the **ODEMP** (Doc Ref. 7.12 Rev 1) and will control decommissioning activities undertaken in relation to the Scheme.<br><br>Mitigation measures are included within the **OSMP** (Doc Ref. 7.14 Rev 1), including measures for soil handling, storage and reinstatement. It includes a commitment to reinstate the Solar Development Area to its original ALC grade. Areas of hardstanding are excluded from this commitment. Whilst they will be decommissioned, there is uncertainty over the ability to reinstate these areas to their current ALC grade. Within **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1) the assessment of effects has been made as if the land use change is permanent. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern regarding damage to soil | The Applicant has assessed the potential impacts of the Scheme on the soil and the results of the soil and ALC surveys undertaken within the Site are reported in **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1). The effects on soil resources identified there would be no discernible loss or reduction of soil function or soil volume for any of the soil types surveyed. Good practice environmental management measures to prevent or reduce damage to soils have been set out within the **OCEMP** (Doc Ref. 7.10 Rev 2), **OOEMP** (Doc Ref. 7.11 Rev 1) and **ODEMP** (Doc Ref. 7.12 Rev 1). 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.<br><br>The **OSMP** (Doc Ref. 7.14 Rev 1), outlines a comprehensive set of measures across the lifetime of the Scheme for the preservation of the soil resource within the Order Limits, avoiding both the loss of soil material from the Order Limits and the loss of soil functional capacity for soil retained within the Order Limits. |

## 6.3. Air Quality

6.3.1. Table 6-3 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Air Quality including signposting to the relevant sections of the DCO Application.

**Table 6-3: Air Quality**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern regarding fumes from BESS fire | Potential air quality impacts from rare and unplanned events such as fire incidents involving Battery Energy Storage System (BESS) or substations have been considered as part of designing the Scheme and preparing the Development Consent Order (DCO) Application. These events are unlikely but could result in short-term emissions that may affect nearby sensitive receptors. This has been assessed within **ES Appendix 16-4 Unplanned Emissions Assessment from Battery Energy Storage Systems (BESS)** [APP-259].<br><br>The assessment demonstrates that after a distance of approximately 200m from the fire, any toxic emissions would reduce to below the acute exposure guideline levels published by Public Health England. Given that the BESS Compound would be sited a minimum of 350m from residential receptors, concentrations will be below relevant health thresholds at any existing residential receptor location. The **Outline Battery Safety Management Plan (OBSMP)** [APP-284] has been prepared for the Scheme to ensure that any fire risks relating to batteries are properly mitigated.<br><br>As set out in Section 2 of the **OBSMP** [APP-284], the BESS will be designed to address prevailing industry standards and good practice, will be located over 350m from the closest residential property and over 450m from the closest Public Rights of Way and will be broken into |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | discrete groups (battery enclosures, inverters, and transformers) which will all reduce fire risk and fire propagation risk. To achieve the identified safety objectives, the Scheme will employ monitoring systems that will help identify any abnormal operation and safely shutdown the system before this develops further. This means that in the event of a fire, the battery system and the transformers serving the BESS would be automatically electrically isolated. |
| Concern regarding construction dust | **ES Chapter 6: Air Quality** [APP-057] assesses the effects of the Scheme on air quality as a result of construction dust emissions, vehicle emissions, and non-road mobile machinery emissions. The assessment concludes that no significant effects are considered likely, with the implementation of mitigation measures set out within Table 6-8 of the **ES Chapter 6: Air Quality** [APP-057] and secured by the **Outline Construction Environmental Management Plan (OCEMP)** (Doc Ref. 7.10 Rev 2).<br><br>These standard good practice mitigation measures to control and minimise dust generation include, but are not limited to, the following:<br>• Preparation and implementation of a Dust Management Plan (DMP) approved by the Local Authority.<br>• Recording and investigation of all dust complaints and incidents, implementing corrective actions where necessary.<br>• Removal of materials that have a potential to produce dust from site as soon as reasonably practicable unless being re-used on site. If they are being re-used on-site, they will be covered as |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | described in **Outline Construction Environmental Management Plan (OCEMP)** (Doc Ref. 7.10 Rev 2).<br>• Planning of the Site layout so that machinery and dust causing activities are located away from receptors, as far as is practical.<br>• Ensuring that sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case appropriate additional control measures will be put in place. Details are set out in the **OCEMP** (Doc Ref. 7.10 Rev 2) and will be implemented during the construction phase through the CEMP, which will be secured by way of Requirement in the DCO.<br>Pursuant to Requirement 12 of the **Draft DCO** (Doc Ref. 3.1 Rev 2), a detailed CEMP must be prepared (substantially in accordance with the OCEMP) and approved prior to development of the Scheme commencing. The detailed CEMP must be implemented as approved. |
| Concern regarding air quality during construction | The impact of construction activities associated with the Scheme on air quality has been assessed within **ES Chapter 6: Air Quality** [APP-057] which concludes no significant effects are expected. Best practice measures to reduce air quality impacts during construction (including dust) (in addition to those mentioned in the row above) such as developing and implementing a Dust Management Plan (DMP), removing materials that have a potential to produce dust from Site as soon as reasonably practicable,:<br>• Ensuring all vehicles switch off engines when stationary, |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | • Avoiding the use of diesel or petrol powered generators, and use of mains electricity or battery powered equipment where reasonably practicable to do so and<br>• Recording all dust and air quality complaints, identifying cause(s), and taking and recording appropriate measures to reduce emissions in a timely manner, and record the measures taken,<br>are included within the Table 6-8 of the **ES Chapter 6: Air Quality** [APP-057] and the **OCEMP** (Doc Ref. 7.10 Rev 2). |
| Concern regarding air pollution at Shepeau Stow Primary School on Dowsdale Bank | The Applicant has carefully considered the potential effects of construction traffic on sensitive receptors in the vicinity of the Scheme. Traffic management measures are secured through the **Outline Construction Traffic Management Plan (OCTMP)** [APP-278] and (Doc Ref. 7.13 Rev 1), which establishes controls on construction vehicle routing and timing. Construction access arrangements have been specifically developed to minimise impacts on local communities and include measures to avoid routing any construction traffic past Shepeau Stow Primary School. The proposed construction traffic strategy does not use Dowsdale Bank for construction traffic movements, thereby reducing the potential for traffic-related air quality effects in the vicinity of the school.<br>The assessment presented in **ES Chapter 15: Traffic and Access** [APP-066] demonstrates that construction traffic would be managed through designated routes and multiple access points to distribute traffic across the network and avoid concentrated impacts on individual locations. As a result, significant adverse effects on air quality at Shepeau Stow |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | Primary School arising from construction traffic are not anticipated. The proposed mitigation measures provide an appropriate framework to protect sensitive receptors, including schools, throughout the construction phase. |

## 6.4. Alternatives and Site Selection

6.4.1. Table 6-4 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Alternatives and Site Selection including signposting to the relevant sections of the DCO Application.

**Table 6-4: Alternatives and Site Selection**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Support for other types of renewable energy development at a smaller scale. | The Applicant notes the support for alternative forms of energy generation. The Applicant has considered alternative energy generation technologies at Section 3.3 of **ES Chapter 3: Alternatives and Design Evolution** [APP-054]. This includes consideration of onshore wind, nuclear, fossil fuels and hydrogen.<br><br>These technology options were discounted as they do not support the objectives of the Scheme or the UK's ambitions to decarbonise the energy, would be inappropriate at this location, are complex or expensive to deploy, and/or would not be suitable for export of electricity directly to the grid. |
| Support for other types of solar development i.e. rooftops, car parks, brownfield, collocated with data centres, instead of utility-scale solar on agricultural land. | While the Applicant agrees that the siting of solar panels on rooftops, car parks, brownfield sites, etc. are beneficial and also contribute to decarbonisation of the energy sector, this typology is not at a scale suitable for the delivery of utility scale energy generation to support decarbonisation of the wider electricity network at a national level.<br><br>Rooftop and urban brownfield sites alone cannot deliver the scale of generation required to meet national renewable energy targets, due to technical constraints such as orientation, shading, structural capacity and fragmented land ownership. Many brownfield sites are also more |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | appropriately reserved for housing, employment or other forms of development in accordance with national planning objectives.<br><br>Large-scale ground-mounted solar developments are therefore an important and necessary component of achieving the UK's solar generation ambitions. The Site has been selected following an assessment of technical, environmental and planning considerations, and the effects of the Scheme have been assessed and mitigated through the scheme design and accompanying Environmental Statement.<br><br>A smaller solar generation development would not deliver the same level of benefits associated with the Scheme in terms of electricity generation, energy security or climate change benefits. |
| Government policy requires applicants to assess alternatives. | Paragraph 4.3.9 of EN-1 establishes that the NPS does not contain any general requirement to consider alternatives or whether a proposed project represents the best option from a policy perspective. However, applicants are required to detail any reasonable alternatives that were studied as part of their ES (paragraph 4.3.15 of EN-1). Further, there are specific circumstances set out within EN-1, EN-3 and EN-5 which do require the Applicant to consider alternatives. These circumstances are detailed at paragraph 5.2.15 of the **Planning Statement** [APP-260].<br><br>The Applicant has assessed alternatives and documented its findings within **ES Chapter 3: Alternatives and Design Evolution** [APP-054] and within **Planning Statement Appendix D: Site Selection Report** [APP-264]. The **Design Approach Document** [APP-269] also provides a narrative regarding alternatives and design development of the Scheme. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Queried the site selection process and decision to locate the Scheme on agricultural land. Requests that the Scheme be located on brownfield, industrial or contaminated land. | The Applicant acknowledges the importance of balancing renewable energy needs with the protection of agricultural land. As set out within **Planning Statement Appendix D: Site Selection Report** [APP-264], the Applicant was unable to identify available brownfield, industrial or contaminated sites within proximity to the Grid Connection that would be suitable for hosting utility scale solar infrastructure.<br><br>Urban brownfield sites alone cannot deliver the scale of generation required to meet national renewable energy targets, due to technical constraints such as orientation, shading, structural capacity and fragmented land ownership. Many brownfield sites are also more appropriately reserved for housing, employment or other forms of development in accordance with national planning objectives.<br><br>Large-scale ground-mounted solar developments are therefore an important and necessary component of achieving the UK's solar generation ambitions. The Site has been selected following an assessment of technical, environmental and planning considerations, and the effects of the Scheme have been assessed and mitigated through the scheme design and accompanying Environmental Statement. |
| EN-1 and EN-3 state that use of BMV agricultural land should be used as a last resort. | This is not a correct interpretation of the policies within EN-1 and EN-3 in relation to the use of BMV agricultural land for renewable energy generation. While paragraph 2.10.21 of EN-3 gives preference to development on poorer quality land, it is clear that "*land type should not be a predominating factor in determining the suitability of the site*". Similarly, paragraph 5.11.34 of EN-1 states that "*the Secretary of State* |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | *should ensure that applicants do not site their scheme on the best and most versatile agricultural land* ***without justification***".<br><br>As detailed within the **Planning Statement Appendix D: Site Selection Report** [APP-264], the Applicant has considered areas of poorer quality land as part of the site selection process, however, no land of sufficient scale for a 750MW solar farm was identified in close proximity to the Point of Connection which does not have a high likelihood of BMV land, making complete avoidance impossible for the Scheme. |

## 6.5. BESS and Fire Safety

6.5.1. Table 6-5 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to the Battery Energy Storage System (BESS) and Fire Safety including signposting to the relevant sections of the DCO Application.

**Table 6-5: BESS and Fire Safety**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Battery fire risk and safety concerns | The Battery Safety Management Plan (BSMP), which will be prepared in accordance with the **Outline Battery Safety Management Plan (OBSMP)** [APP-284] and secured by way of Requirement in the **Draft DCO** (Doc Ref. 3.1 Rev 2), ensures that the final BESS compound will be designed in accordance with prevailing industry standards and good practice at the time of detailed design and implementation.<br><br>The Scheme design and documentation is fully compliant with UK NFCC 'Grid Scale Battery Energy Storage System planning – Guidance for FRS (2026)'.<br><br>The Applicant's **Outline Battery Safety Management Plan** (OBSMP) [APP-284]and design will fully accommodate the latest BESS safety requirements contained in NFPA 855 (Standard for the Installation of Stationary Energy Storage Systems) (2026) ensuring that any credible risks associated with battery storage are either prevented or fully mitigated if a BESS failure occurs. The OBSMP has been prepared for the Scheme using guidance from Lincolnshire Fire and Rescue Service (LFR) and incorporating recommendations of the National Fire Chiefs Council (NFCC). The OBSMP very clearly documents the fire and explosion protection requirements for the illustrative BESS design and the BESS system that will be selected at the detailed design stage. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | The Applicant's OBSMP [APP-284] has been drafted to identify and address credible BESS failure hazards namely thermal (fire), overpressure /deflagration (explosion), and toxic emission (plume) hazards. In addition, the OBSMP addresses potential secondary BESS fire pollution issues i.e. water and soil contamination.<br><br>As stipulated in paragraph 1.2.2 of the **OBSMP** [APP284]: "The design of the BESS and its impact are controlled in several ways. Prior to commencement of construction of the BESS, a BSMP (in accordance with the OBSMP) is required to be submitted to the relevant local planning authority and approved, in consultation with Lincolnshire Fire and Rescue Service (LFR) and the Environment Agency (EA). The Applicant must operate the BESS in accordance with the approved plan."<br><br>As now mandated under NFPA 855 (2026) the Applicant will only be able to select a BESS system that has undertaken Large Scale Fire Testing (LSFT). At the detailed design stage, the selected BESS LSFT data will be leveraged to fully inform inputs for risk assessment tools which will be utilised together with detailed consequence modelling to provide a comprehensive site operations and emergency response safety audit, this is stipulated in the OBSMP pre-construction requirements (Section 5).<br><br>LSFT involves deliberately burning a complete BESS enclosure to evaluate thermal exposure, heat release rates, burn duration, maximum temperatures and, critically, the potential for fire propagation to adjacent BESS or associated equipment. The purpose of this testing is expressly to validate minimum equipment spacing and to demonstrate |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | that cascading or multi- BESS enclosure ignition does not occur where tested layouts and mitigation measures are implemented. These tests therefore explicitly address the type of multi-BESS fire propagation risks, including scenarios observed in real world incidents, by requiring evidence that propagation risk is controlled through design rather than reliance on emergency intervention.<br><br>The implementation of the OBSMP [APP-284] is secured through Requirement 6 in Schedule 2 of the **Draft DCO** (Doc Ref. 3.1 Rev 1). This provides that a detailed Battery Safety Management Plan (BSMP) will be submitted to Lincolnshire County Council for approval following consultation with LFR and the Environment Agency (EA) prior to the commencement of the works for the BESS. The final BSMP plan will be substantially in accordance with this OBSMP.<br><br>Potential fire incidents involving battery energy storage systems (BESS) and substations have also been assessed separately in **ES Appendix 16-4: Unplanned Emissions Assessment from BESS** [APP-259], with a summary of the assessment provided within Section 16.5 Major Accidents and Disasters of **ES Chapter 16: Other Environmental Topics** [APP-067]. The appendix includes modelling of potential emissions from thermal events affecting single or multiple cabinets, addressing the potential health impacts. The assessment demonstrates that after a distance of approximately 200m from a fire, any toxic emissions (hydrogen fluoride used as a proxy) would reduce to below the acute exposure guideline levels published by Public Health England. Given that the BESS Compound would be sited a minimum of 350m from |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | residential receptors, concentrations will be below relevant health thresholds at any existing residential receptor location.<br><br>The BESS Site will have a robust and validated emergency response plan (ERP), developed in consultation with LFR. Where an incident has the potential to affect surface water or groundwater, the ERP will include priority notification and escalation procedures for the Environment Agency (EA) and, where applicable, downstream receptors such as licensed abstractors. All relevant incident response parties, including the EA, the lead local flood authority and the site operator, will be made aware of the ERP and will have immediate access to it. Notification procedures will be activated at the earliest practicable stage of any incident with the potential to affect controlled waters. |

## 6.6. Climate Change and Carbon

6.6.1. Table 6-6 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to the Climate Change and Carbon including signposting to the relevant sections of the DCO Application.

**Table 6-6: Climate Change and Carbon**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern that the project will not reduce CO2 Emissions or lead to carbon savings | The Applicant contests the principle that the Scheme will make no difference to the climate emergency. If approved, the Scheme would contribute a significant amount of energy generated through a clean energy source, which may otherwise have been delivered through more climate-harming means of generation. Paragraph 4.2.2 of National Policy Statement (NPS) EN-1 states that the UK's *"energy security and net zero ambitions will only be delivered if we can enable the development of new low carbon sources of energy at speed and scale"*, and this would include the Scheme.<br><br>As set out in **ES Chapter 7: Climate Change** [APP-056], the lifecycle Greenhouse Gas (GHG) assessment covers all direct emissions from activities during the construction, operation, and decommissioning stages of the Scheme, this includes emissions embedded within the production of construction materials, as well as emissions arising from the transportation of materials, waste and construction workers. This approach aligns with industry best practice and follows methodologies used in comparable solar ESs.<br><br>The significance of a Scheme's emissions is based on its net impact over its lifetime. Without low-carbon energy generation projects such as the Scheme, the average grid GHG intensity will not decrease as is projected, which would adversely affect the UK's ability to meet its |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | carbon reduction targets. The carbon intensity of UK grid electricity is expected to decarbonise in line with Government projections, with a goal of net-zero by 2050.<br><br>These assessments conclude that the construction and decommissioning of the Scheme will not result in a significant effect on the global climate, while the operation of the Scheme will result in a significant beneficial effect on the global climate, due to the clean energy it produces. Therefore, the Scheme will provide a net reduction in GHG emissions, compared to a scenario without the Scheme based on forecast UK grid average energy emissions available from the Department for Energy Security and Net Zero for the beginning of operation (forecast to be 2033). |

## 6.7. Construction Methodology

6.7.1. Table 6-7 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Construction Methodology including signposting to the relevant sections of the DCO Application.

**Table 6-7: Construction Methodology**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Proposed third party access road close to dwellings | Third party accesses have been included within the DCO Application in order to demonstrate how third-party asset owners of existing infrastructure would be able to access their assets in co-existence with the construction, operation and/or decommissioning of the Scheme. Whilst it is likely that the asset owner already has access rights in place, as part of a complete assessment and comprehensive Scheme design, it is necessary to show the potential route that the relevant third-party could take, taking into consideration the wider Scheme works. The third party accesses proposed from the nearest public highway network and have prioritised using existing accesses, however where this is not possible, access has been provided close to field boundaries to minimise disruption to the wider land parcel.<br><br>In all instances, third-party accesses will not be used for construction, operation, maintenance or decommissioning activities associated with the Scheme. Instead, the access has been included in order to allow potential access for relevant third parties to access their assets. This could include construction activities such as mitigation works inclusive of rerouting, removal and undergrounding of this specific asset or installing scaffold protection above the asset, as well as routine maintenance and inspection. Movements along such accesses are assumed to be infrequent and no physical works are envisaged to the relevant route; instead, they would be used in their current state or protected with interlocking panels at ground. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | Access arrangements for third party access may to be refined through ongoing discussions with the relevant third-parties and landowners. |

## 6.8. Consultation and Engagement

6.8.1. Table 6-8 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Consultation and Engagement including signposting to the relevant sections of the DCO Application.

**Table 6-8: Consultation and Engagement**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Consultation feedback has not been listened to | The Applicant is confident in the adequacy of consultation delivered throughout the pre-application phase, as described and evidenced in the **Consultation Report** [APP-037].<br><br>The Applicant had regard to all feedback provided during each stage of consultation. The feedback provided to each stage of consultation was analysed and responded to, as detailed in the **Consultation Report** [APP-037] submitted with the DCO Application.<br><br>The **Design Approach Document** [APP-268] also details how the Applicant continued to refine the Scheme in response to stakeholder and community feedback and to reflect updated technical information emerging from ongoing engagement with NGET. |
| Concern with the quality of consultation undertaken | The Applicant is confident in the adequacy of consultation delivered throughout the pre-application phase, as described and evidenced in the **Consultation Report** [APP-037].<br><br>The Applicant's approach to pre-application consultation was designed to ensure that consultees were given meaningful opportunities to understand the proposals and provide their feedback. A range of engagement methods were employed, supported by accessible materials presented in a variety of formats and at appropriate levels of detail. The |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | Applicant also ensured that the Scheme was widely publicised to reach all those with an interest.<br><br>The Applicant undertook a multi-staged programme of consultation and engagement to help build understanding, encourage greater participation in the development of the Scheme and provide opportunities for local views to influence the proposals. Further information on each stage of consultation and the methods used to advertise the project is detailed within the Consultation Report [APP-037]. |
| Concern local people were not notified about the project proposals | In accordance with Sections 42, 47 and 48 of the PA 2008, the Applicant undertook a programme of pre-application consultation prior to submitting its application for development consent.<br><br>The Applicant ensured the Scheme was widely publicised to reach all those with an interest, and ensured all relevant parties were notified about the proposals throughout the pre-application phase.<br><br>To help facilitate and guide engagement with the local community, the Applicant established a Primary Consultation Zone (PCZ) comprising homes and businesses located within proximity to the proposed Scheme boundary. The Applicant wrote to properties within the PCZ to notify people of the Scheme proposals and different stages of public consultation. The PCZ was agreed with the host local authorities in advance of the Scheme's stage two (statutory) consultation.<br><br>In addition, to maximise awareness and ensure accessibility, the Applicant employed a range of methods to promote engagement during |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | each stage of consultation, including media releases, emails and stakeholder letters, website updates and more.<br><br>Details on how the Applicant promoted each stage of consultation, and which stakeholders were notified, is detailed within the Consultation Report [APP-037]. |
| Concern about the timescales provided to review the DCO application | The Applicant has complied with its duty to publicise under Section 56 of the Planning Act 2008.<br><br>The minimum statutory timescale for the relevant representation period is 28 days, however the Applicant chose to allow six weeks for the relevant representation period. This is in line with industry standard for other NSIP solar schemes.<br><br>Interested Parties will have further opportunities to submit their views and comments on the DCO Application as part of the request for written representations. The examination process will also allow Interested Parties to provide comments on additional submissions entered into the examination at specified deadlines. These deadlines will be confirmed within the Rule 8 letter issued by the Examining Authority following the Preliminary Meeting. |
| Concerns with the quality of the consultation materials/plans, including information presented during consultation was different to what was submitted as part of the DCO application | The Applicant is confident in the adequacy of consultation delivered throughout the pre-application phase, as described and evidenced in the **Consultation Report** [APP-037].<br><br>The Applicant remains confident that the information issued for the consultation was clear, provided adequate time for community involvement, and effectively invited participation. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | Every effort was made to ensure all of the material used for the consultation process was accessible, clear and easy to follow in order to inform the public when taking part in the feedback process.<br><br>The Applicant believes that the consultation materials were of a good quality and of suitable detail to enable consultees to provide feedback on the Scheme proposals at multiple points in the development of the Scheme design. Further information on the Applicant's approach to consultation and details of its consultation materials can be found in the **Consultation Report** [APP-037] and its **Appendices** [APP-038 to APP-050].<br><br>The Applicant has continued to develop its proposals during the pre-application phase. As is typical for nationally significant infrastructure projects, the design of the Scheme has been an iterative process, responding to technical engineering challenges, environmental surveys, and feedback received during each stage of consultation.<br><br>Therefore, the indicative design and Scheme proposals have undergone refinement following each stage of consultation, including between the last stage and submitting the DCO Application. Parties will continue to have the opportunity to comment on the proposals as presented in the DCO Application throughout the Examination stage. For further details on how the Scheme design has evolved see the **Design Approach Document** [APP-268]. |

## 6.9. Cultural Heritage

6.9.1. Table 6-9 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Cultural Heritage including signposting to the relevant sections of the DCO Application.

**Table 6-9: Cultural Heritage**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern over impacts on the historic environment in general | **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) provides an assessment of the potential for physical impacts of all aspects of the Scheme on the significance of recorded and unrecorded heritage assets within the Site and the impacts on the significance of heritage assets as a result of changes to their setting. This includes buried archaeological deposits, built heritage and historic landscapes. The Applicant considers that a reasonable, proportionate and consistent approach has been taken, guided by national and local guidance that has enabled the collection of high-quality reliable data. This has provided an adequate understanding of the archaeological potential and developmental impacts as set out in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) and has been used to inform the **Outline Archaeological Mitigation and Management Strategy (OAMMS)** (Doc Ref 8.7) submitted at Deadline 1. The OAMMS sets out details of further archaeological evaluation to be carried out at the Site together with the archaeological mitigation measures to be employed. The assessment has been undertaken in consultation with the Archaeological Advisor for Lincolnshire County Council (LCC) and Historic England. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern over impacts on buildings including designated and non-designated heritage assets, specifically as a result of increased road traffic. | **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) provides an assessment of the potential for physical impacts of the Scheme on the significance of recorded and unrecorded heritage assets within the Site and the impacts on the significance of heritage assets as a result of changes to their setting. This includes effects on built heritage assets as a result of construction, operation and decommissioning traffic. No significant effects have been identified.<br><br>Potential effects on heritage assets arising from construction traffic would be prevented or managed through the use of defined construction routes, traffic management, speed controls and monitoring, and, where necessary, site-specific mitigation measures in consultation with relevant local authorities. Further details of measures proposed are set out within the **Outline Construction Traffic Management Plan** [APP-278]. |
| Concern over impacts on historic landscape | **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) section 8.9 provides an assessment of the potential for physical impacts of the Scheme on the significance of recorded and unrecorded heritage assets within the Site and the impacts on the significance of heritage assets as a result of changes to their setting. This includes buried archaeological deposits, built heritage and historic landscapes. The assessment is supported by **ES Appendix 8-4: Summary of Heritage Setting Assessment** (Doc Ref. 6.3 Rev 1). The Applicant considers that a reasonable, proportionate and consistent approach has been taken, guided by national and local guidance including Historic England's |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | Historic Environment Good Practice Advice in Planning. Note 3: The Setting of Heritage Assets. |
| Concern over impacts on the heritage setting of Crowland | A large part of Crowland's cultural significance lies in the historic relationship between the abbey, the town and the extent of its monastic lands, its influence over the surrounding landscape and how the monastic lands grew and changed over time in relation to the power and wealth of the abbey. The abbey is a key focal point of the town set back from the town core. However, the main focal point of the town is the Scheduled Monument and Grade I Listed Building Holy Trinity Bridge (1005051, 1064508) located at the junction West Street, North Street and South Street[56]. The tower of Crowland Abbey is a notable monument on the horizon when looking towards Crowland due to its distinctive shape and its height above other structures in the town. The tower appears in the views whilst travelling towards the town. Elements in the wider landscape such as the boundary stones and the ditches and banks would have been practical in design and acted as a physical indicator to people travelling thought the fenland that they were arriving at or leaving at the abbey lands. While these elements contribute to the cultural significance of Crowland, uninterrupted views of the boundary of the precinct from the abbey, and in particular the earthworks at Queen's Bank and St Guthlac's cross, were not intended or a designed part of the |

[56] APS (1998) Archaeological Implications of the Reappraisal of Crowland Conservation Area, Crowland, Lincolnshire (CCA98). p3 and 12. Available at: https://doi.org/10.5284/1009651 [Accessed 06/09/2026]

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | landscape. As a result, the significance of these features, both individual and as a group, had been retained despite changes in the landscape. The assessment presented within **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) has concluded that the Scheme will have an impact on the historic precinct of Crowland Abbey, which includes the towns, due to the introduction of the solar development infrastructure, resulting in a minor adverse direct impact on the medium importance landscape for the operational life of the Scheme.<br><br>The assessment is supported by **ES Appendix 8-4: Heritage Setting Assessment** (Doc Ref. 6.3 Rev 1). The Applicant considers that a reasonable, proportionate and consistent approach has been taken, guided by national and local guidance including Historic England's Historic Environment Good Practice Advice in Planning. Note 3: The Setting of Heritage Assets. An assessment of the effect of the Scheme on the significance of Crowland Abbey and its historic precinct is included in section 8.9. |
| Query whether a Scheduled Monument Consent will be applied for prior to the grant of the DCO Consent | Consultation regarding the Scheduled Monuments has been undertaken with Historic England and is ongoing. As set out in the **OAMMS** (Doc Ref 8.7), no construction, operation or decommissioning works will be undertaken within the boundary of the Scheduled Monuments and provisions will be made within the detailed Archaeological Mitigation and Management Strategy to ensure that the monuments are protected from accidental damage. As a result, Scheduled Monument Consent is not required. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | The commitments made in relation to ecological mitigation for ground nesting birds are not likely to require an alteration to the Class Consent, based on the DCO proposals and consultation with Historic England to date. Any alteration of the agricultural practices currently undertaken under Class Consent will be determined through further consultation with Historic England at detailed design stage. |
| Concern over the impact of tree and shrub planting on archaeology | **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) provides an assessment of the potential for physical impacts of all aspects of the Scheme, including landscape and ecological requirements, on the cultural significance of recorded and unrecorded heritage assets within the Site. Where potential for significant archaeological deposits has been identified a proportionate mitigation strategy has been developed. This strategy would cover areas where tree and shrub planting is proposed.<br><br>The Applicant considers that a reasonable, proportionate and consistent approach has been taken, guided by national and local guidance that has enabled the collection of high-quality reliable data. This has provided an adequate understanding of the archaeological potential and developmental impacts as set out in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) and has been used to inform the **OAMMS** (Doc Ref. 8.7) submitted at Deadline 1. The assessment has been undertaken in consultation with the Archaeological Advisor for Lincolnshire County Council and Historic England. |
| Concern over impacts on historic farmsteads | **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) provides an assessment of the potential for physical impacts from the Scheme on |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | the significance of designated and non-designated heritage assets within the Site and the impacts on the significance of heritage assets as a result of changes to their setting. This assessment has included an assessment of the historic farmsteads and the historic landscape in which they are located. Assessment of individual farmsteads can be found in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1 Rev 1) **ES Appendix 8-4: Heritage Setting Assessment** (Doc Ref. 6.3 Rev 1). No significant effects on the cultural significance of the historic farmsteads have been identified.<br><br>An additional assessment of the potential effect of the Scheme on the group value of the historic farmsteads is to be produced with reference to LCC's Historic Farmsteads Group Value Framework for NSIPs. The assessment is being prepared and will be presented within the **Historic Farmstead Group Value Assessment** to be submitted at Deadline 2. |

## 6.10. Cumulative Effects

6.10.1. Table 6-10 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Cumulative Effects including signposting to the relevant sections of the DCO Application.

**Table 6-10: Cumulative Effects**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern about general cumulative effects Concern regarding the cumulative impact of multiple energy projects across Lincolnshire, including cumulative effects with National Grid's electricity transmission schemes | The Applicant notes this comment. A cumulative assessment has been undertaken for all environmental topics considered within the Environmental Statement and the results are set out in **ES Chapter 6 to ES Chapter 15** [APP-057 to APP-066].<br><br>As set out in Section 4.7 of **ES Chapter 4: Overview of the EIA Process** [APP-055], the Applicant followed a four-stage process in line with the Planning Inspectorate's Advice on Cumulative Effects Assessment. During Stage 1 of this process, a search radius of 30km for Nationally Significant Infrastructure Projects (NSIPs) and 15km for other types of applications was selected to identify a long list of cumulative schemes. The criteria set out in Table 4-10 of **ES Chapter 4: Overview of the EIA Process** [APP-055] was applied to ensure that the search was proportionate and included all committed developments that had the potential to give rise to cumulative effects in combination with the Scheme.<br><br>The long list of cumulative schemes considered is provided within **ES Appendix 4-1: List of Cumulative Schemes** [APP-170]. The long-list of cumulative schemes was shared with LCC and South Holland District Council (SHDC) for comment during the pre-application stage, with comments received considered as part of finalising the list of cumulative schemes for assessment. Further criteria were subsequently applied to |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | identify a short list of cumulative schemes which would then be taken forward for assessment. The short list is included in **ES Appendix 4-1: List of Cumulative Schemes** (Doc Ref. 6.3).<br><br>Each of the technical chapters (ES Chapter 5 to 16) carried out a cumulative effects assessment of the schemes that were included in the short list, and the results are presented within Section 11 of each chapter.<br><br>As set out within **Section 5.11 of ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1 Rev 1), it is estimated that cumulative solar projects in Lincolnshire, together with the Scheme, 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 across the identified solar projects. This is indicative that solar schemes represent a small proportion of agricultural and BMV land in the County. Whilst these figures are estimates, they are indicative of the position 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.<br><br>**ES Chapter 12: Landscape and Visual** [APP-063] has considered the landscape and visual effects of the Scheme on a predominantly rural area and change of use of agricultural land, as set out within **ES** |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | **Appendix 12-4: Landscape Assessment** [App-238] and **ES Appendix 12-6: Visual Assessment** [App-239].<br><br>Cumulative landscape and visual effects with other developments are set out within **ES Appendix 12-7** [APP-241] and summarised within Section 12.11 of **ES Chapter 12: Landscape and Visual** [APP-063].<br><br>Following the construction of the cumulative schemes, the additional cumulative effect introduced by the Scheme is not considered to be significant on landscape and visual receptors across all phases of the Scheme. However, when the totality of the change in the landscape is considered with the Scheme and all of the cumulative schemes together, it is concluded that there will be some significant effects.<br><br>The Scheme design has been developed to take into account the proximity of receptors and to reduce the perceived industrialisation of the area. The Applicant has sought to minimise effects on residential properties, as far as reasonably practicable, through the routeing and design of the overhead lines within the Grid Connection Route and the Inter-Array Connection. During design development, buffers were situated around residential properties in order to align the overhead lines away from them as much as practicable.<br><br>Setbacks are secured within the **Works Plans** [APP-009 & APP-010] and the **OLEMP** (Doc Ref. 7.16 Rev 1) to maintain an appropriate distance between the infrastructure and residential receptors within the Solar Development Areas. Planting and Habitat Management Areas are proposed within the vicinity of residential properties to reduce visual effects. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | Regarding Grimsby to Walpole, an updated landscape and visual assessment from that presented at PEIR has been provided within **ES Chapter 12: Landscape and Visual** [APP-063]. 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><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. **ES Figure 12- 21** [APP-131 to APP-142] and **ES Figure 12-22** [APP-143 to APP-146] show all cumulative infrastructure surrounding the Scheme. |

## 6.11. Decommissioning

6.11.1. Table 6-10 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Decommissioning including signposting to the relevant sections of the DCO Application.

**Table 6-11: Decommissioning**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concerns that infrastructure could be left in place beyond the operation of the Scheme, with requests for funds to be ring-fenced to ensure the Scheme will be fully decommissioned at the end of its operation. | Under the DCO, the undertaker will be legally obliged to decommission the Scheme no later than 40 years following the date of final decommissioning pursuant to Requirement 21 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). Requirement 21 further provides that decommissioning must be undertaken in accordance with an approved Decommissioning Environmental Management Plan, which must be prepared substantially in accordance with the **Outline Decommissioning Environmental Management Plan (ODEMP)** (Doc Ref. 7.12 Rev 1). Failure to comply with the terms of a DCO is a criminal offence.<br><br>The Proceeds of Crime Act 2002 also acts as a further deterrent, and elements of the installed solar PV represent a valuable asset, meaning it would be in the Applicant's interest financially to decommission the site in order to sell or recycle the panels and other components. If the Applicant went into liquidation or receivership, its assets would be sold off to fund the decommissioning of the Scheme that is required pursuant to the legal requirement of the DCO (in this context, it is relevant that the DCO is a piece of legislation, and therefore different to a planning permission).<br><br>A decommissioning bond is not routine for energy DCOs. and while similar arguments have been advanced requesting a decommissioning |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | bond in the Examinations for most other solar DCOs, it is noted that the Secretary of State has not required one for those made to date. |
| Concerns that waste will be left at the Site following decommissioning which could lead to contamination. | The Applicant (or its successor) is legally obliged to decommission the Scheme no later than 40 years following the date of final decommissioning pursuant to Requirement 21 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). Requirement 21 further provides that decommissioning must be undertaken in accordance with an approved Decommissioning Environmental Management Plan, which must be prepared substantially in accordance with the **ODEMP** (Doc Ref. 7.12 Rev 1). Failure to comply with the terms of a DCO is a criminal offence.<br><br>Table 3-6 of the **ODEMP** (Doc Ref. 7.12 Rev 1) provides details of measures that would be implemented as part of decommissioning of the Scheme to ensure contamination of the land across the Order Limits is mitigated as far as practicable. |
| Decommissioning effects will be adverse and would counter any benefits associated with the Scheme. | The Environmental Statement has assessed the effects of decommissioning activities. Decommissioning activities are expected to give rise to equal or lesser adverse effects to the construction phase. Where an ES Chapter identifies mitigation for the decommissioning phase, this has been secured through the **ODEMP** (Doc Ref. 7.12 Rev 1).<br><br>Prior to the start of the Decommissioning phase, a Decommissioning Environmental Management Plan will be prepared (substantially in accordance with the **ODEMP** (Doc Ref. 7.12 Rev 1), submitted to and approved by the local authority. Decommissioning must proceed in accordance with the approved Decommissioning Environmental |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | Management Plan. This is secured by Requirement 21 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). |
| Concerns that decommissioning traffic will generate noise and cause damage to local roads. | The decommissioning phase is anticipated to be shorter in duration and result in fewer road trips and, therefore, its impacts would be less than that experienced during the construction phase.<br><br>**ES Chapter 15: Traffic and Access** [APP-066] confirms that transport and access impacts resulting from decommissioning traffic associated with the Scheme are considered to be negligible to minor (not significant).<br><br>An **ODEMP** (Doc Ref. 7.12 Rev 1) has been prepared as part of the DCO Application. This provides details of traffic mitigation measures that would be implemented through a Decommissioning Traffic Management Plan (DTMP). The DTMP would be developed by the Principal Contractor prior to decommissioning in consultation with the LPAs and adapted from the **Outline CTMP** [APP-278] and (Doc Ref. 7.13 Rev 1) to reflect the circumstances at that time.<br><br>Prior to the start of the Decommissioning phase, a Decommissioning Environmental Management Plan will be prepared (substantially in accordance with the **ODEMP** (Doc Ref. 7.12 Rev 1), submitted to and approved by the local authority. Decommissioning must proceed in accordance with the approved Decommissioning Environmental Management Plan. This is secured by Requirement 21 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| General concerns about decommissioning but no specific details are stated. | An **ODEMP** (Doc Ref. 7.12 Rev 1) has been prepared as part of the DCO Application. This provides details of measures that would be implemented as part of decommissioning of the Scheme to ensure environmental impacts across the Scheme are managed and mitigated as far as practicable.<br><br>The Applicant (or its successor) is legally obliged to decommission the Scheme no later than 40 years following the date of final decommissioning pursuant to Requirement 21 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). Requirement 21 further provides that decommissioning must be undertaken in accordance with an approved Decommissioning Environmental Management Plan, which must be prepared substantially in accordance with the **ODEMP** (Doc Ref. 7.12 Rev 1). Failure to comply with the terms of a DCO is a criminal offence. |
| Requests for further details about decommissioning and restoration. | An **ODEMP** (Doc Ref. 7.12 Rev 1) has been prepared as part of the DCO Application. This provides details of measures that would be implemented as part of decommissioning of the Scheme to ensure environmental impacts across the Scheme are managed and mitigated as far as practicable.<br><br>Under the DCO, the undertaker will be legally obliged to decommission the Scheme no later than 40 years following the date of final decommissioning pursuant to Requirement 21 of the **Draft DCO** (Doc Ref. 3.1 Rev 2).<br><br>Where an ES Chapter identifies mitigation for the decommissioning phase, this has been secured through the **ODEMP** (Doc Ref. 7.12 Rev 1). |

## 6.12. Ecology and Biodiversity

6.12.1. Table 6-12 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Ecology and Biodiversity including signposting to the relevant sections of the DCO Application.

**Table 6-12: Ecology and Biodiversity**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concerns on the loss of local wildlife habitats, which would have an overall net negative ecological impact. | The Scheme would not result in the loss of local wildlife habitats. The impact of the Scheme on wildlife is assessed within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1 Rev 1) which concludes no significant residual adverse effects are expected. Construction is focused on arable fields which provide limited value to wildlife whilst more suitable habitat is buffered from construction activities. This will be overseen by Ecological Clerk of Works (ECoW) during construction safeguarding more valuable habitat. Significant habitat will also be created resulting from the development thereby increasing and not losing habitat for local wildlife.<br><br>As part of the landscape design for the Scheme, new habitats would be provided to increase biodiversity compared to the existing baseline. This will include field margins and habitat management areas which have been set aside and species monitoring and adaptive management responsibilities secured through the **Outline Landscape and Ecology Management Plan (OLEMP)** (Doc Ref 7.16 Rev 1). Requirement 8 of the **Draft DCO** (Doc Ref 3.1 Rev 2) secures 10% biodiversity net gain for habitat units, a minimum of 400% biodiversity net gain for hedgerow units and a minimum of 10% biodiversity net gain for watercourse units. This would include converting areas of agricultural land around and beneath the solar PV |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | panels into species rich grassland, providing new tree and shrub planting along field boundaries, and enhancing habitats next to watercourses. In doing so, reducing herbicide use and runoff into watercourses.<br><br>The Solar Development Area incorporates approximately 174ha of habitat management areas where no physical infrastructure is proposed. Out of this, over 150ha have been specifically set aside for the enhancement of habitats for farmland birds, such as skylark. The creation and subsequent management of habitats is set out within the **OLEMP** (Doc Ref. 7.16 Rev 1), included as part of the DCO Application. A moderate beneficial (significant) effect with embedded controls and habitat establishment is resultantly identified on protected species, **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1 Rev 1). |
| Concerns that construction of the development would have a negative impact on the environment and biodiversity | A full Environmental Statement has been submitted as part of the DCO Application. This includes **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1 Rev 1) which assesses the impact of the Scheme on biodiversity and wildlife. The assessment concludes that no significant residual adverse effects are expected during the construction phase, with the implementation of construction mitigation measures set out within the **Outline Construction Environmental Management Plan (OCEMP)** (Doc Ref. 7.10 Rev 2). Examples of mitigation measures include: micro-siting of infrastructure alongside establishing buffers from key habitat features (including but not limited to, woodlands, trees with bat roost potential, watercourses, hedgerows etc); provision of an Ecological |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | Clerk of Works (ECoW) to supervise vegetation clearance where necessary; and sensitive lighting strategy to limit adverse effect on nocturnal species. |
| Concerns that the operation of the development would have a negative impact on the environment and biodiversity | A full Environmental Statement has been submitted as part of the DCO Application. This includes **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1 Rev 1) which assesses the impact of the Scheme during operation on biodiversity and wildlife. The assessment concludes that no significant residual adverse effects are expected, with the implementation of mitigation measures set out within the **OCEMP** (Doc Ref. 7.10 Rev 2), **Outline Operational Environmental Management Plan (OOEMP)** (Doc Ref 7.11 Rev 1) and the **OLEMP** (Doc Ref. 7.16 Rev 1). During operation of the Scheme, a moderate beneficial (significant) effect with embedded controls and habitat establishment is resultantly identified on protected species and a minor beneficial (Significant at a local scale) effect for hedgerows and line of trees has been concluded in Table 9-15 of, **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1 Rev 1). Requirement 8 of the **Draft DCO** (Doc Ref 3.1 Rev 2) secures 10% biodiversity net gain for habitat units, a minimum of 400% biodiversity net gain for hedgerow units and a minimum of 10% biodiversity net gain for watercourse units. |
| Concerns that fences would have a negative impact on wildlife | A comprehensive assessment of the impacts of the Scheme on biodiversity and wildlife is presented in **ES Chapter 9: Ecology and Biodiversity (**Doc Ref 6.1 Rev 1), which concludes that there are no |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | significant residual adverse significant effects as a result of the Scheme following implementation of mitigation.<br><br>A security fence will be implemented early in the construction phase to prevent disturbance from construction activity in proximity to peripheral habitats and retained habitats within the Order Limits. As set out within the **Outline Construction Environmental Management Plan (OCEMP**) (Doc Ref. 7.10 Rev 2), the specification of the fencing will be determined at detailed design. This will include assessment of including wildlife gates to allow mammals that may use woodland habitats, including small deer, Badger, Brown Hare and Hedgehog, to pass underneath at strategic locations, so as not to avoid creating barriers to dispersal. Fencing will be regularly inspected and maintained and removed as part of the demobilisation unless otherwise specified.<br><br>During operation, a security fence will enclose the operational areas of the Solar Development Area. The fence will be a 'deer fence' type, of approximately 2m in height measured from the ground. |
| Concerns that biodiversity would not return post-decommissioning | Biodiversity net gain will be provided over the operational lifetime of the Scheme, as set out within the **Biodiversity Net Gain Report** (Doc Ref. 7.9 Rev 1) and secured through Requirement 8 of the **Draft DCO** (Doc Ref. 3.1 Rev 2). Any habitat creation and enhancement will remain for the lifespan of the Scheme. Upon decommissioning all physical infrastructure within the Order limits will be removed and the land returned to its former condition and land use. Some areas of |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | habitat and biodiversity mitigation and enhancement may be left for species protection, but this will be up to the landowners at the time.<br><br>An **ODEMP** (Doc Ref. 7.12 Rev 1) has been prepared as part of the DCO Application and includes that pre-decommissioning ecological surveys would be undertaken to inform the decommissioning strategy. Prior to the start of the Decommissioning phase, a detailed DEMP will be prepared, submitted to and approved by the local authority and is secured by the **Draft DCO** (Doc Ref. 3.1 Rev 2). This will be in substantial accordance with the **ODEMP** (Doc Ref. 7.12 Rev 1). |
| Concerns that the ornithological surveys do not accurately reflect the true abundance of farmland birds present within the Study Area. | The Applicant does not agree that the ornithological surveys underestimate the abundance of farmland bird species within the Study Area.<br><br>The breeding bird surveys (**ES Appendix 9-3: Breeding Bird Survey Report** [APP-206] were conducted using six pre-defined transects and six visits between March and July 2023, with winter surveys, **ES Appendix 9-4: Wintering Bird Survey Report 2022-2023** (Doc Ref. 6.3 Rev 1), **ES Appendix 9-5 Wintering Bird Survey Report 2023-2024** (Doc Ref. 6.3 Rev 1) and **ES Appendix 9-6 GCC Wintering Bird Survey Report 2023-2024** (Doc Ref. 6.1 Rev 1) comprising six and five pre-defined transects and six visits between October and March (respectively) following standard British Trust for Ornithology (BTO) and Bird Survey Guidelines, (2023) methods. Standards and proportionality were based on current guidance, with transects designed for visibility in open fenland and consultation with Natural |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | England on survey scope. Each transect route was walked slowly and methodically and all birds seen within or adjacent to the Study Area were recorded using standard British Trust for Ornithology (BTO) species codes. The assessments were compiled by a Principal Ecologist and full member of CIEEM, with over 40 years ornithological experience. All surveyors are proficient in bird identification and survey technique.<br><br>The Applicant considers that the survey effort was proportionate to the characteristics of the Site and sufficient to identify the presence and distribution of overwintering and breeding bird species, including farmland birds such as skylark. The findings presented within the Environmental Statement are therefore considered to provide a robust baseline against which potential impacts have been assessed. |
| Concerns that the development would have a detrimental impact on the Fenland's ecology and unique environment | The impact of the Scheme on ecology is assessed within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1 Rev 1). The chapter concludes no significant residual effects are expected with solar infrastructure restricted to actively farmed arable land only. Good practice measures relevant to managing impacts on ecological receptors during construction, operation and decommissioning are set out in the **OCEMP** (Doc Ref. 7.10 Rev 2), the **OOEMP** (Doc Ref 7.11 Rev 1), and the **ODEMP** (Doc Ref. 7.12 Rev 1). |
| Concerns around the validity of the Applicant's claim that the development would lead to a net biodiversity gain | As part of the landscape design for the Scheme, new habitats would be provided to increase biodiversity compared to the existing baseline. This would include converting areas of agricultural land around and beneath the solar PV panels into species rich grassland, |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | providing new tree and shrub planting along field boundaries, and enhancing habitats next to watercourses. The Solar Development Area incorporates approximately 174ha of habitat management areas where no physical infrastructure is proposed. Out of this, over 150ha have been specifically set aside for the enhancement of habitats for farmland birds, such as skylark. The creation and subsequent management of habitats is detailed within the **OLEMP** (Doc Ref. 7.16 Rev 1), included as part of the DCO Application. Requirement 8 of the **Draft DCO** (Doc Ref 3.1 Rev 2) secures 10% biodiversity net gain for habitat units, a minimum of 400% biodiversity net gain for hedgerow units and a minimum of 10% biodiversity net gain for watercourse units. |

## 6.13. Effect Interactions

6.13.1. Table 6-13 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Effect Interactions including signposting to the relevant sections of the DCO Application.

**Table 6-13: Effect Interactions**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern over impacts on local communities | Impacts on surrounding residents and businesses during construction, operation and decommissioning have been considered in the following technical chapters of the ES:<br>• ES Chapter 6: Air Quality [APP-057];<br>• ES Chapter 10: Human Health [APP-061];<br>• ES Chapter 12: Landscape and Visual [APP-063];<br>• ES Chapter 13: Noise and Vibration [APP-064];<br>• ES Chapter 14: Socio-economics and Land Use [APP-065];<br>• ES Chapter 15: Traffic and Access [APP-066]; and<br>• ES Chapter 17: Effect Interactions [APP-068].<br>These chapters also consider cumulative effects with other projects within the study area. Measures have been set out within the **Outline Construction Environmental Management Plan (OCEMP)** (Doc Ref. 7.10 Rev 2), **Outline Operational Environmental Management Plan (OOEMP)** (Doc Ref. 7.11 Rev 1), **Outline Decommissioning Environmental Management Plan (ODEMP)** (Doc Ref. 7.12 Rev 1) and **Outline Construction Traffic Management Plan (OCTMP)** [APP-278] and (Doc Ref. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | 7.13 Rev 1) which would limit disruption to the local community, as far as practicable.<br><br>Furthermore, the Applicant considers that the Scheme will provide a number of benefits to the local community, including:<br><br>• Provision of local employment, apprenticeships, skills training, supply chain opportunities and increased spend in the local area;<br>• Provision of a permissive path connecting Public Rights of Way between Queens Bank and Shepeau Stow, following the boundary of the Settlement W of Cate's Cove Corner Scheduled Monument;<br>• Provision of biodiversity net gain, as set out within the **Biodiversity Net Gain Report** (Doc Ref. 7.9 Rev 1) and secured via Requirement 8 of the **Draft DCO** (Doc Ref 3.1 Rev 2). |

## 6.14. Electric and Magnetic Fields

6.14.1. Table 6-14 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Electric and Magnetic Fields including signposting to the relevant sections of the DCO Application.

**Table 6-14: Electric and Magnetic Fields**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| General concern around EMF emissions | Electric and magnetic fields (EMF) are produced whenever electricity is used or transmitted. Background EMFs are present in most homes, produced from household wiring and electrical appliances. Examples of these are presented in Section 16.3 of **ES Chapter 16: Other Environmental Topics** [APP-067].<br><br>The Applicant confirms that EMFs are assessed in **ES Chapter 16: Other Environmental Topics** [APP-067] and within the **EMF Compliance Assessment** [APP-273]. The **EMF Compliance Assessment** includes an assessment of the potential EMFs from the Scheme against the exposure limits developed by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and includes evidence on potential impacts from exposure to radiation. The approach has been agreed with UK Health Security Agency ( UKHSA) following the inclusion of Department of Energy & Climate Change (DECC) (2012) 'Power Lines: Demonstrating compliance with EMF public exposure guidelines A voluntary Code of Practice' guidance.<br><br>As set out in Section 16.3 of **ES Chapter 16: Other Environmental Topics** [APP-067], the UK policy on public exposure limits to EMF radiation is designed to comply with the 1998 ICNIRP. No significant effects were identified in the EMF assessment, and levels of electromagnetic radiation from the Scheme are predicted to be well |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | below 1998 ICNIRP reference levels at all surrounding locations where public exposure levels are relevant. |
| Concerns about the overhead line interfering with satellite and internet connections | Radiofrequency emissions from overhead lines are limited, as they are designed in line with the British Standards for minimising the generation of radio interference. All the equipment used will meet the requirements in these standards and will be in place to prevent interference issues. These are the same good engineering practices that are applied to the existing National Grid transmission system assets, including existing 400 kV overhead lines, which cause no interference issues for electrical equipment, telecommunication, Wi-Fi and broadcast equipment under normal operating conditions. Therefore the Applicant does not expect any interference issues as a result of the Scheme. |

## 6.15. Glint and Glare

6.15.1. Table 6-15 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Glint and Glare including signposting to the relevant sections of the DCO Application.

**Table 6-15: Glint and Glare**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern on the impact of glint and glare to residential properties and road users | The Applicant notes that a Glint and Glare assessment is presented in **ES Chapter 16: Other Environmental Topics** [APP-067], which considers the impact of the Scheme on receptors, including residential, road, bridleway, and aviation. The assessment takes into account the orientation, height and surface characteristics of the solar PV panels, which are specifically designed to absorb light rather than reflect it. The assessment concludes no significant glint and glare effects on the basis of the design parameters fixed by the **Works Plans** [APP-009] and [APP-010] and the **Design Parameters** (Doc Ref. 7.4 Rev 2). |
| Concern on increase collision risk for airfield users | This is considered in **ES Chapter 16: Other Environmental Topics** [APP-067] and **ES Appendix 16-2: Glint and Glare Assessment** [APP-255 - APP-257). The chapter concludes that effects upon the runway approach path to Crowland Airfield and Fenland Airfield from the Scheme would be low and acceptable (not significant).<br><br>Suitable buffers have been incorporated into the Scheme design to ensure infrastructure is outside a theoretical Obstacle Limited Surface of airfields, and therefore does not impact the operation of the airfield. Solar PV panels are designed to absorb, not reflect, irradiation. A general consensus in relevant studies is that there is potential for glint and glare from PV panels to cause a hazard or nuisance for surrounding |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | receptors, but that the intensity of such reflections is similar to that emanating from still water. |

## 6.16. Grid Connection and OHL

6.16.1. Table 6-16 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Grid Connection and OHL including signposting to the relevant sections of the DCO Application.

**Table 6-16: Grid Connection and OHL**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Proximity of the overhead line to residential properties. | The Applicant has sought to maximise the separation between residential properties as far as technically possible. Pylon locations have been identified along the alignment taking into account site-specific constraints, such as environmental features, existing infrastructure and land use, as well as the technical and engineering requirements of the overhead line. Technical requirements include maintaining appropriate and balanced span lengths between pylons to avoid taller pylon structures, achieving the necessary statutory minimum conductor clearances to ground level and accommodating changes in land topography. As a result, while the locations shown represent the current design, they may be subject to refinement within the limits of deviation as the project progresses.<br><br>When navigating the routeing between two properties or constraints, the alignment has been designed looked to pass equidistant where possible, to give both parties maximum stand-off from proposed infrastructure. In certain areas the alignment requires a change in direction, which means certain properties may be affected on more than one aspect. The Applicant has tried to position angle pylons and associated overhead lines as far away from residential receptors as possible. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | |
| The siting of pylons within agricultural fields | During development of the design of the overhead line, consideration was given to the siting of pylons in agricultural fields whilst balancing overhead line span lengths and keeping pylon heights to a minimum. Where possible, pylons were sited more than 30m away from field boundaries to allow farm machinery to pass between the field edge and the pylon legs, or were sited as close to the field boundary as possible to minimise any sterilisation of land between the pylon and the boundary if requested.<br><br>Pylons are located based on balancing multiple factors as detailed above, as well as proximity to drains and other ecological and cultural heritage features. |
| The use of pylons in though residential areas | During the early stages of the Project, the Grid Connection Corridor (GCC) was developed to avoid major settlements and areas of housing, whilst also attempting to maximise stand-off from scattered residential properties. Following identification of the preferred GGC, the proposed 400kV OHL has been designed in accordance with the Holford Rules, avoiding areas of amenity value whilst minimising changes in direction thus introducing fewer angle pylons.<br><br>In addition, the OHL has been designed through balancing a variety of localised constraints such as ecology, vegetation impacts, land use, topography, major crossings (e.g., roads, existing electricity lines). Inclusive of the aforementioned constraints, although the OHL is representative of the current design, the alignment may be subject to final refinement as the project progresses due to a number of technical |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | factors including but not limited to; maintaining appropriate and balanced span lengths between pylons, accommodating changes in land topography and achieving the necessary statutory minimum conductor clearances within the Limits of Deviation.<br><br>Where residential properties exist, the OHL has been designed to maximise stand-off, and where properties exist on both sides, it has been routed to manage the stand-off distances to residential receptors on either side of the alignment. As a result, the OHL proposed in the design maintains a minimum 50m offset from residential properties. |
| The potential for pylons to be made taller at detailed design. | The pylons heights have been designed to be the minimum required to meet the statutory ground clearance for each overhead line span across the route.<br><br>The overhead line has been designed to a minimum clearance of 8.5m from the conductors to the ground, a value of which exceeds the minimum statutory requirements as set out in the 'The Electricity Safety, Quality and Continuity Regulations 2002 (ESQCR 2002)' and by the 'ENA Technical Specification 43-8' (due to the absence of LiDAR data).<br><br>To ensure statutory ground clearances are maintained should pylons moves, the pylons have a +7.4m vertical LoD, allowing an increase in height by 7.4m beyond what's currently proposed in the design. This allows clearances to be maintained due to changes in ground level and topography. A value of 7.4m has been determined from the standard designs of the proposed suite of pylons. These designs include extension panels which are used to make pylons taller and come with |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | set heights. A 7.4m vertical LoD allows the options of two extensions to be added to pylons. |
| Concerns that the design is premature as the Weston Marsh B substation has not been consented. | The Applicant holds a Gate 1 offer from National Energy System Operator in respect of the connection of the Scheme to the National Grid. This Gate 1 offer indicates that Weston Marsh is the indicative point of connection for the Scheme and the Applicant considers that this is an appropriate basis to progress the design and consent of the Scheme.<br><br>The Applicant has also engaged with and continues to try to engage with NGET in respect of the design and consent to align the Scheme with the Grimsby to Walpole proposed Weston Marsh Substation. |

## 6.17. Hearings and Procedures

6.17.1. Table 6-17 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Hearings and Procedures including signposting to the relevant sections of the DCO Application.

**Table 6-17: Hearings and Procedures**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Request to be kept informed and involved throughout the examination period. | By registering as an Interested Party through the submission of a relevant representation, parties will be kept informed throughout the examination process, including opportunities to attend hearings. |
| Requests for further opportunities to comment on the DCO Application documents. | Interested Parties will have further opportunities to submit their views and comments on the DCO Application as part of the request for written representations. The examination process will also allow Interested Parties to provide comments on additional submissions entered into the examination at specified deadlines. These deadlines will be confirmed within the Rule 8 letter issued by the Examining Authority following the Preliminary Meeting. |
| Request to attend Open Floor Hearings and Issue Specific Hearings. | Interested Parties will have an opportunity to register to attend or speak at Open Floor Hearings, Compulsory Acquisition Hearings and Issue Specific Hearings. The Examining Authority will publish details of how to register to attend any hearings on the Project website. |
| Concern that the registration and response timescales for the relevant representation period are too short. Longer time should be provided to review all the DCO Application documents. | The minimum statutory timescale for the relevant representation period is 28 days, however the Applicant chose to allow six weeks for the relevant representation period. This is in line with industry standard for other NSIP solar schemes.<br><br>Interested Parties will have further opportunities to submit their views and comments on the DCO Application as part of the request for |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | written representations. The examination process will also allow Interested Parties to provide comments on additional submissions entered into the examination at specified deadlines. These deadlines will be confirmed within the Rule 8 letter issued by the Examining Authority following the Preliminary Meeting. |

## 6.18. Human Health

6.18.1. Table 6-18 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Human Health including signposting to the relevant sections of the DCO Application.

**Table 6-18: Human Health**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern over impacts on physical and mental health and wellbeing and quality of life | The Applicant confirms that the impact of the Scheme on physical and mental wellbeing of local residents during the construction, operation and decommissioning phases has been considered in **ES Chapter 10: Human Health** [APP-061]. 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 and concludes that there are no significant effects expected during the construction, operation and decommissioning phases, with the implementation of mitigation measures committed to in the management plans submitted with the DCO Application. The management plans relevant to the human health assessment include: **Outline Construction Environmental Management Plan (OCEMP)** (Doc Ref. 7.10 Rev 2), **Outline Operational Environmental Management Plan (OOEMP)** (Doc Ref. 7.11 Rev 1); **Outline Decommissioning Environmental Management Plan (ODEMP)** (Doc Ref. 7.12 Rev 1); **Outline Construction Traffic Management Plan (OCTMP)** [APP-278] and (Doc Ref. 7.13 Rev 1); **Outline Public Rights of Way Management Plan (OPRoW-MP)** [APP-281]; and **Outline Landscape and Ecology Management Plan (LEMP)** (Doc Ref. 7.16 Rev 1). |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern that it will prevent residents enjoying the environment | 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 assessment methodology for human health follows a single consistent framework based on the Institute of Environmental Management and Assessment (IEMA) Guide to Determining Significance for Human Health in Environmental Impact Assessment.<br><br>It is also acknowledged that temporary closures and diversions to PRoW during the construction phase could influence physical activity levels and recreational opportunities for the local population. As outlined in **ES Chapter 15: Traffic and Access** [APP-066], impacts on PRoW receptors during the construction of the Scheme have been determined through consideration of severance, pedestrian delay, pedestrian and cyclist amenity, and fear and intimidation. **ES Chapter 15: Traffic and Access** [APP-066] sets out that no PRoW will be subject to permanent diversions or closures. Two PRoWs (PRoW Wstn/3/1 and PRoW Crow/12/1) will require temporary closure during the construction period. Whilst temporary closure on these routes will be required for 4-6 weeks, the assessment concluded that overall effect on PRoW and active travel routes as a result of the Scheme is considered not significant.<br><br>The Applicant confirms that the impact of the Scheme on mental wellbeing of local residents has been considered in **ES Chapter 10: Human Health** [APP-061] and concludes that no significant effects are |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | expected, with the implementation of the mitigation measures set out within the management plans submitted with the DCO Application. |
| Concern about quality of life deterioration | The Applicant notes that **ES Chapter 10: Human Health** [APP-066] assesses potential effects of the Scheme on the health and wellbeing of local residents during the construction, operation and decommissioning phases. 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 not anticipated that the Scheme would impact quality of life in the construction, operation and decommissioning phases, with no significant effects identified for the general population with the implementation of the mitigation measures committed through the DCO Application. |

## 6.19. Hydrology and Flood Risk

6.19.1. Table 6-19 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Hydrology and Flood Risk including signposting to the relevant sections of the DCO Application.

**Table 6-19: Hydrology and Flood Risk**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concerns that water supply to the Scheme could aggravate existing water pressure issues experienced by local residents. | Consultation and engagement with Anglian Water Services (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>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 or decommissioning of the Scheme.<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. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | 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 Rev 1). |
| Concerns that the Scheme may negatively impact the existing fenland drainage system which consists of a large number of dykes, and increase flood risk due to potential increase in impermeable surfaces. | The potential impact of the Scheme on flooding and drainage, including interactions with existing ditches and dykes, is assessed in **ES Appendix 11-3: Flood Risk Assessment (FRA)** (Doc Ref. 6.3 Rev 2) and **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1 Rev 1). The FRA recognises the presence of dykes within and surrounding the Order Limits and notes that these form part of the existing drainage network which is subject to regular inspection and maintenance regime by the relevant operators (Internal Drainage Boards). **ES Appendix 11-3: FRA** (Doc Ref. 6.3 Rev 2) concludes that, with the implementation of proposed mitigation, the Scheme would not materially increase flood risk with the Order Limits or in the surrounding areas, nor would it compromise the function or integrity of existing drainage features. As such, no increased risk to local infrastructure arising from flooding is anticipated as a result of the Scheme.<br><br>**ES Appendix 11-4: Outline Drainage Strategy** [APP-227] has been prepared to support the DCO Application. This considers runoff from the Scheme and proposes sustainable drainage techniques that will be implemented to manage this. This will be developed into a detailed Drainage Strategy post consent, following the detailed design of the Battery Energy Storage System (BESS) and On-Site Substations Compounds. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| BESS Fires | The Battery Safety Management Plan (BSMP), which will be prepared in accordance with the **OBSMP** [APP-284] and secured by way of Requirement 6 in the **Draft DCO** (Doc Ref. 3.1 Rev 2), sets out the controls in place to ensure that, in the unlikely event a fire did occur, any impacts arising from the fire and/or the actions implemented to control it (such as contaminated fumes and/or water run off) are managed appropriately so there are minimal impacts from contamination on the surrounding communities and environment.<br><br>The BESS Enclosures would have automatic fire detection systems in place along with fire suppression systems. Water storage tanks and hydrants would be provided to have a storage volume up to approximately 360,000 litres to allow a discharge rate of approximately 1,500 litres per minute over a 4-hour period. In the case of an incident, fire water would be contained within the lined attenuation basin by an automated penstock valve, with a manual override, to be pumped out and disposed of off-site by a specialist contractor to ensure the surrounding area is not polluted. |

## 6.20. Land and Compulsory Acquisition

6.20.1. Table 6-20 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Land and Compulsory Acquisition including signposting to the relevant sections of the DCO Application.

**Table 6-20: Land and Compulsory Acquisition**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Property Market Impacts<br><br>Concerns around the use of compulsory purchase powers on residential properties | The Applicant confirms that the DCO does not seek powers to compulsorily acquire any residential properties, nor to subject any homes to compulsory acquisition powers, within the Solar Development Area, Inter-Array Connections or Grid Connection Route. |
| Concerns around the impact on property prices | The Applicant does not consider that the Scheme will result in any loss of value to neighbouring properties. Impacts on property prices are not a material consideration under section 104 of the Planning Act 2008, which sets out the matters the Secretary of State must have regard to, which includes the relevant National Policy Statements (NPS), which in this case are NPS EN-1 (Ref 1-17), NPS EN-3 (Ref 1-18) and NPS EN 5. None of these policy documents consider property prices, and this therefore should not be a factor which is considered by the Secretary of State when determining the Application. |

## 6.21. Landscape and Visual

6.21.1. Table 6-21 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Landscape and Visual matters including signposting to the relevant sections of the DCO Application.

**Table 6-21: Landscape and Visual**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concerns with pylons destroying countryside views | The Applicant acknowledges the concerns around the impact of the proposed pylons to countryside views.<br><br>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** [APP-238]) and **ES Appendix 12-6: Visual Assessment** [APP-240], with a summary provided within Section 12.8 of **ES Chapter 12: Landscape and Visual** [APP-063]. The assessments were supported by visualisations, contained within **ES Figures 12-21** [APP-131-APP-142] and **ES Figure 12-22** [APP-143-APP-146], which provide a realistic representation of the scale, form and visibility of the overhead line infrastructure within the existing landscape.<br><br>The Environmental Statement concludes that, whilst significant effects will arise beyond Operation Year 15 for representative views that relate to the Grid Connection Route, these effects would not be of a magnitude that would result in major adverse effects on residential visual amenity during any phase of the development. |
| Concerns with overhead line visual impact and suggestion to go underground instead. | The selection of an overhead line as the preferred technology for the grid connection is guided by national policy contained in the National Policy Statement for Electricity Networks, EN-5, which states that it is |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | the Government's position that outside of nationally designated landscapes, overhead lines should be the strong starting presumption for electricity networks in general unless these would give rise to particularly significant landscape and visual effects.<br><br>The potential landscape and visual effects of the proposed overhead line infrastructure have been assessed in detail within **ES Chapter 12: Landscape and Visual** [APP-063] and the associated technical appendices. This assessment considers the character and sensitivity of the receiving landscape, and informs the conclusions on the significance of effects.<br><br>All landscape and visual effects reported with respect to Grid Connection Route infrastructure are moderate adverse effects. The cumulative effects assessment does not report an increase in the significance of the adverse effects as a result of additional overhead line infrastructure associated with the Grimsby to Walpole and Weston Marsh to East Leicestershire overhead line projects.<br><br>While there is no definition within EN-5 as to what may be deemed 'particularly significant', the Applicant has understood this to be those effects that exceed moderate adverse significance, which is not the case for the overhead line infrastructure, including in the cumulative effects assessment. Additionally, there is no specific segment of the Grid Connection Route where greater landscape or visual effects are reported.<br><br>The Applicant has therefore adopted an approach that is consistent with national policy, taking into account the balance between visual effects, |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | technical feasibility, environmental considerations and the urgent national need to deliver new electricity network infrastructure to support decarbonisation and energy security. |
| Concerns with solar panels destroying countryside views | Potential impacts and likely significant effects on landscape character and visual amenity are assessed within **ES Chapter 12: Landscape and Visual** [APP-063] with mitigation embedded into the design of the Scheme. The assessment recognises that significant visual effects would remain at Year 15, following the establishment of mitigation planting, from locations where there are direct views into the Site.<br><br>The LVIA and the landscape design presented within the **OLEMP** (Doc Ref. 7.16 Rev 1) have considered the character, sensitivity and distinctiveness of the local area. The proposed mitigation measures including planting, habitat management areas and careful siting of infrastructure, have been designed to reduce visual effects over time and to respond to the local landscape context.<br><br>In some areas, advanced planting is proposed to be undertaken during the first available planting season prior to the commencement of construction. Where planting intended to mitigate adverse effects on people's views cannot be carried out during this planting season, it would be implemented at the start of the construction phase. This approach would enable vegetation to establish at an earlier stage, helping to provide visual screening sooner and thereby reducing the duration and extent of adverse effects on views.<br><br>The **Design Approach Document** [APP-268] demonstrates how the principles of 'good design' have been applied to the Scheme, including |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | the layout, height and orientation of the solar PV panels with the aim of minimising visual intrusion while maintaining technical viability. The height of the panels has been considered as part of the design process and has been assessed within the landscape assessment presented in **ES Chapter 12: Landscape and Visual** [APP-063].<br><br>In addition, **ES Chapter 3: Alternatives and Design Evolution** [APP-054] also provides further information on the alternative options considered and explains how alternative layouts and design options were considered and refined in response to environmental constraints and consultation feedback. |
| Concerns with the Scheme destroying countryside views and landscape character (General) | The concerns regarding the visual impact of the Scheme on the landscape character and visual amenity are acknowledged.<br><br>The Scheme design has evolved to take into account the proximity of receptors and to reduce the perceived industrialisation of the area.<br><br>The LVIA and landscape design presented within the **OLEMP** (Doc Ref. 7.16 Rev 1) have considered the character and distinctiveness of the local area. The **Design Approach Document** [APP-268] demonstrates how the principles of 'good design' have been applied to the Scheme, including the layout, height and orientation of the solar PV panels with the aim of minimising visual intrusion while maintaining technical viability. The height of the panels has been considered as part of the design process and has been assessed within the landscape assessment presented in **ES Chapter 12: Landscape and Visual** [APP-063].<br><br>The Applicant has sought to mitigate landscape and visual impacts through screening with bands of native scattered trees and shrubs |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | throughout the Solar Development Area. The **OLEMP** (Doc Ref. 7.16 Rev 1) and its accompanying Outline Landscape Masterplan set out the planting proposals for the Scheme.<br><br>**ES Chapter 3: Alternatives and Design Evolution** [APP-054] also provides further information on the alternative options considered. |
| Concerns with industrialisation of the rural landscape & cumulative impact alongside other major energy schemes | **ES Chapter 12: Landscape and Visual** [APP-063] has considered the landscape and visual effects of the Scheme in a predominantly rural area and change of use of agricultural land, as set out within **ES Appendix 12-4: Landscape Assessment** [APP-238] and **ES Appendix 12-6: Visual Assessment** [APP-240].<br><br>Cumulative landscape and visual effects with other developments are set out within **ES Appendix 12-7** [APP-241] and summarised within Section 12.11 of **ES Chapter 12: Landscape and Visual** [APP-063]. It is concluded that when the landscape and visual effects from the Scheme are considered in addition to the landscape and visual effects of the identified cumulative schemes,<br><br>The Scheme design has been developed to take into account the proximity of receptors and to reduce the perceived industrialisation of the area. The Applicant has sought to minimise effects on residential properties, as far as reasonably practicable, through the routeing and design of the overhead lines within the Grid Connection Route and the Inter-Array Connection. During design development, buffers were situated around residential properties in order to align the overhead lines away from them as much as practicable. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | Setbacks are secured within the **Works Plans** [APP-009] and [APP-010] and the **OLEMP** (Doc Ref. 7.16 Rev 1) to maintain an appropriate distance between the infrastructure and residential receptors within the Solar Development Areas. Planting and Habitat Management Areas are proposed within the vicinity of residential properties to reduce visual effects. |
| Concerns that Habitat Management Areas are not fixed, and may not come forward. | The **OLEMP** (Doc Ref. 7.16 Rev 1) outlines the proposed landscape strategy for the Scheme. 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 Rev 1) and illustrated on **Figure 1 Outline Landscape Masterplan** of the **OLEMP** (Doc Ref. 7.16 Rev1).<br><br>The **OLEMP** (Doc Ref. 7.16 Rev 1) defines Habitat Management Areas and their purpose. These areas have also been included within the **Works Plans** [APP-009] and [APP-010], and are identified as falling under Works Number 7. The draft DCO restricts the use of Work No. 7 areas to landscape, biodiversity and habitat management purposes, including planting, habitat creation, drainage, access tracks, permissive paths and associated fencing. The land cannot be used for other purposes.<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 Rev 1). This includes measures for long-term management of planting up until the decommissioning of the Scheme. The **OLEMP** (Doc Ref. 7.16 Rev 1) also includes a minimum five-year |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | establishment period for planting, during which plant replacement will be undertaken where necessary to ensure successful establishment of the mitigation planting. |
| Concern that Grimsby to Walpole is not considered in the cumulative assessment. | An updated landscape and visual assessment from that presented at PEIR has been provided within **ES Chapter 12: Landscape and Visual** [APP-063]. 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><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. **ES Figure 12- 21** [APP-131 to APP-142] and **ES Figure 12-22** [APP-143 to APP-146] show all cumulative infrastructure surrounding the Scheme. |

## 6.22. Major Accidents and Disasters

6.22.1. Table 6-22 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Major Accidents and Disasters including signposting to the relevant sections of the DCO Application.

**Table 6-22: Major Accidents and Disasters**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concerns over fire risk in relation to the BESS | The Applicant recognises the importance of appropriately managing fire risk associated with the BESS. An **OBSMP** [APP-284] has been prepared to identify, manage and mitigate fire risk associated with the design, construction, operation and decommissioning of the BESS. **The OBSMP** [APP-284] sets out the proposed battery safety measures, emergency response procedures and firefighting requirements.<br><br>The **OBSMP** [APP-284] has been developed in consultation with the Lincolnshire Fire & Rescue Service, and in accordance with the requirements of the **Draft DCO** (Doc Ref 3.1 Rev 2), the relevant planning authority must consult with Lincolnshire Fire and Rescue and the Environment Agency before determining an application for approval of the battery safety management plan. The OBSMP will therefore be further developed and finalised through consultation with those bodies at the detailed design stage prior to implementation. |
| Concerns on increase in incident risk to aviation | The Applicant notes the concerns raised regarding aviation safety. Crowland Airfield and Fenland Airfield have were both assessed in **ES Chapter 16: Other Environmental Topics** [APP-067] within both the Glint and Glare and Major Accidents and Disasters sections. The chapter concludes that effects upon the runway approach paths to both airfields from the Scheme would be low and acceptable (not significant). |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | Suitable buffers have been incorporated into the Scheme design to ensure infrastructure is outside a theoretical Obstacle Limited Surface of the airfields, and would not adversely affect the operation of the airfield. A full assessment of glint and glare from the Scheme is provided in **ES Appendix 16-2: Glint and Glare Assessment** [APP-255] & [APP-256] & [APP-257].<br><br>The applicant also notes that, following statutory consultation, the proposed Inter-Array Connection between Land Parcels A and B was changed from an overhead to an underground connection in response to aviation safety concerns associated with Crowland Airfield. This design change removed the potential interaction between that element of the Scheme and aviation activities at the airfield. |
| General health and safety concerns in relation to the high voltage pylons | The Applicant acknowledges these concerns raised regarding health and safety in relation to the proposed high voltage overhead line infrastructure.<br><br>The Applicant confirms that a full assessment of the likely significant effects of the Scheme on human health is set out in **ES Chapter 10: Human Health** [APP-061], which concludes that no significant effects on human health are expected. The assessment considers elements of the Scheme which could affect human health, including air quality, landscape and visual, noise and vibration, traffic and access, social infrastructure and impacts on mental health and wellbeing.<br><br>Electric and Magnetic Fields (EMF) are produced whenever electricity is used or transmitted. Background EMFs are present in most homes, produced from household wiring and electrical appliances. Examples of |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | these are presented in Section 16.3 of **ES Chapter 16: Other Environmental Topics** [APP-067].<br><br>EMFs are assessed in **ES Chapter 16: Other Environmental Topics** [APP-067] and within the **EMF Compliance Assessment** [APP-273]. The **EMF Compliance Assessment** [APP-273] includes an assessment of the potential EMFs from the Scheme against the exposure limits developed by ICNIRP and includes evidence on potential impacts from exposure to radiation. The approach has been agreed with UKHSA following the inclusion of DECC (2012) 'Power Lines: Demonstrating compliance with EMF public exposure guidelines A voluntary Code of Practice' guidance.<br><br>The Applicant confirms that, as set out in Section 16.3 of **ES Chapter 16: Other Environmental Topics** [APP-067], the UK policy on public exposure limits to EMF radiation is designed to comply with the 1998 International Commission on the Non-Ionizing Radiation Protection (ICNIRP) guidelines. No significant effects were identified in the EMF assessment, and levels of electromagnetic radiation from the Scheme are predicted to be well below 1998 ICNIRP reference levels at all surrounding locations where public exposure levels are relevant. |

## 6.23. Materials and Waste

6.23.1. Table 6-23 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Materials and Waste including signposting to the relevant sections of the DCO Application.

**Table 6-23: Materials and Waste**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern regarding the management of solar panels at the end of their operational life | The Applicant notes the concerns raised regarding the management of solar panels at the end of their operational life.<br><br>Solar panels typically have an indicative design life of approximately 25 to 40 years and will be maintained, inspected and replaced where required during the 40-year operational life of the Scheme, as described in **ES Chapter 2: The Scheme** [AS-017]. Any replacement of equipment during operation would be undertaken in accordance with the **Outline Operational Environmental Management Plan (OOEMP)** (Doc Ref. 7.11 Rev 1).<br><br>The potential impacts and likely significant effects on materials and waste are assessed in Section 16.5 of **ES Chapter 16: Other Environmental Topics** [APP-067] which confirms the Scheme will apply the waste hierarchy, prioritising waste prevention, followed by preparing for reuse, recycling and recovery, with disposal to landfill only as a last resort.<br><br>The potential for recycled content within the main construction materials is outlined in Table 16-24, and Table 16-26 provides estimates of the quantities of construction and decommissioning waste which are expected to be recyclable/recoverable by the Scheme. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | Recycling routes are currently available for component replacement waste, the assessment recognizes that recycling opportunities are likely to increase over time as the solar PV recycling market continues to develop in response to growing demand. For the purposes of the assessment. A recovery rate of 70% has been assumed to be achievable for decommissioning waste.<br><br>At the end of the operational life of the Scheme, the solar panels and associated infrastructure would be removed and managed in accordance with the relevant legislative requirements and good practice applicable at that time, with materials reused, recycled or recovered wherever reasonably practicable. |

## 6.24. Noise and Vibration

6.24.1. Table 6-24 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Noise and Vibration including signposting to the relevant sections of the DCO Application.

**Table 6-24: Noise and Vibration**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concerns about traffic noise | **ES Chapter 13: Noise and Vibration** [APP-064] assesses the effects of construction, maintenance and decommissioning traffic noise as a result of the Scheme. The assessment concludes that temporary significant residual traffic noise effects are predicted only at properties along Langary Gate Road during construction and decommissioning phases of the Scheme.<br><br>To minimise traffic-related noise and disturbance, construction traffic will access Langary Gate Road via B1166 Long Lane and restrictions on HGV deliveries will be managed through a Delivery Management System (DMS), implemented in accordance with the provisions of the **Outline Construction Traffic Management Plan** (**OCTMP**) [APP-278] and (Doc Ref. 7.13 Rev 1). The **OCTMP** [APP-278] will control vehicle routing, timing and scheduling of vehicle movements to avoid network peak hours, minimise congestion, and reduce associated noise and disturbance at sensitive receptors.<br><br>While temporary significant traffic noise effects have been identified, the Applicant has incorporated mitigation measures into the Scheme design and construction management strategy to reduce noise impacts on nearby communities so far as reasonably practicable, in line with best practice. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concerns about construction noise | **ES Chapter 13: Noise and Vibration** [APP-064] assesses the effects of construction noise as a result of the Scheme. Noise impacts will be reduced through a combination of good site management and the use of quieter construction techniques. Mitigation measures include selecting low-noise and low-vibration plant where practicable, reviewing construction methods and programmes to identify quieter approaches, and carefully locating equipment and controlling working hours. Material drop heights will be minimised to reduce impact noise, and plant and vehicles will be started sequentially rather than simultaneously. Off-site prefabrication will be used where feasible to reduce on-site activities, while temporary acoustic screening will be installed around particularly noisy plant and operations to further limit noise emissions.<br><br>Following the implementation of mitigation measures which are set out within the **Outline Construction Environmental Management Plan (OCEMP)** (Doc Ref. 7.10 Rev 2), the assessment concludes that the only significant construction noise effect is identified at Receptor Group 53 (RG53) (presented in **ES Figure 13-5 Study Area, Receptor and Noise Monitoring Positions** [APP-151]), as a result of potential night-time Horizontal Directional Drilling (HDD) activities required for trenchless crossings.<br><br>The exact approach to trenchless crossing techniques would not be confirmed until post-consent when a principal contractor is appointed. As such, a conservative worst-case approach has been applied that is likely to overestimate construction noise effects. Furthermore, subject to detailed design, it may be possible for elements of the Grid |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | Connection to oversail certain third-party assets, reducing or removing the need for trenchless crossings.<br><br>Whilst the assessment identifies the potential for significant adverse noise effects due to potential HDD activities at night, the Applicant has incorporated mitigation measures and construction controls in accordance with best practice to minimise noise effects on nearby receptors so far as reasonably practicable. Mitigation may include avoiding works within 100 m of a property, temporary acoustic fencing to fully screen noise-generating plant and loading and unloading of vehicles, dismantling of site equipment or moving equipment or materials around the Order Limits to be conducted in such a manner as to minimise noise generation, as far as reasonably practicable. |
| Concerns regarding vibration | **ES Chapter 13: Noise and Vibration** [APP-064] assesses the effects of construction vibration as a result of the Scheme. The construction vibration assessment considered the nature of the proposed works and the distance to the nearest identified sensitive receptors. Based on these factors, no significant construction vibration effects are predicted. During operation, the Scheme does not comprise plant or equipment capable of generating significant ground-borne vibration, and therefore operational vibration was scoped out of the Environmental Impact Assessment (EIA). |
| Concerns about operational noise | **ES Chapter 13: Noise and Vibration** [APP-064] assesses the effects of operational noise as a result of the proposed overhead line, substation, BESS and solar farm infrastructure. Although effects at Receptor Group 04 (RG04) and RG05 prior to mitigation were considered to be |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | significant, use of low-noise conductors and applying noise reduction measures such as spacing of subconductors, spacing of conductors and use of hydrophilic coating, residual operational noise would not have a significant effect on health and quality of life.<br><br>There is a commitment to achieve the post-mitigation rating noise levels (presented in Table 13-29 of **ES Chapter 13: Noise and Vibration** [APP-064] to provide confidence that significant effects on health and quality of life would be avoided. This commitment is secured through Requirement 18 of the **Draft DCO** Doc Ref 3.1 Rev 2). |

## 6.25. Operation and Maintenance

6.25.1. Table 6-25 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Operation and Maintenance including signposting to the relevant sections of the DCO Application.

**Table 6-25: Operation and Maintenance**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concerns that maintenance and replacement activities associated with the panels could cause disruption and damage to the community. | **ES Chapter 2: The Scheme** [AS-017] provides the indicative design life for each component of the Scheme. The Solar PV Panels are assumed to have an indicative design life of 25 to 40 years. On this basis, the ES assumes that the Solar PV Panels would be replaced once during the Scheme's operational life, over a 12-to-24-month period with a small proportion requiring ad hoc replacement taking place outside of this period as part of routine maintenance.<br><br>Each ES Chapter takes into consideration the replacement of solar panel infrastructure as part of maintenance activities.<br><br>Replacement of infrastructure is expected to generate up to a maximum of 40 HGVs (or 80 two-way HGV movements) per day, and up to 75 staff car trips (150 two-way movements) per day. This is considerably lower than the level of vehicle trips generated during the peak construction phase, equating to approximately 20% of both the HGV and LGV/car movements generated during peak construction of the Solar Development Area and Grid Connection Route.<br><br>As set out within **ES Chapter 15: Traffic and Access** [APP-066], due to the low level of operational traffic to be generated by the Scheme, no significant effects are likely to occur. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| Concerns the operation of the Scheme will use a substantial amount of water and electricity. | The water supply for the office facilities at the On-Site Substation Compounds will either be tankered in or come from the mains supply. Whether it comes from the mains supply or tankered in, grey water will be disposed to a tank emptied by specialist licenced contractor. It is assumed that the Scheme will require 90 litres of water per person per day for up to 10 employees. Up to $3m^3$ of water will be required for every 1000 panels, with an estimated water requirement per year of $3,386m^3$ . Water supply for more extensive operational activities (e.g. panel cleaning) will be delivered to the Site from third party suppliers, so as not to put stress on local water supply.<br><br>The Applicant has considered electricity usage as part of its lifecycle greenhouse gases assessment within **ES Chapter 7: Climate Change** [APP-058]. It is assumed that the annual grid energy requirement for operations will equate to 7.94 GWh per year, which is equivalent to 1% of the expected annual energy generation. The carbon intensity of UK grid electricity is expected to decarbonise in line with Government projections, with a goal of net-zero by 2050. Therefore, operational energy emissions will therefore be highest in the first year of operation, and decrease thereafter, with minimal operational energy emissions occurring after 2050. |
| View that solar development does not generate enough electricity to save money on electric bills. | The Scheme is designed to contribute to the wider decarbonisation of the energy system and improve energy security across the county. While it does not offer individual bill reduction, it supports long-term environmental economic benefits, including stabilising energy prices and reducing reliance on fossil fuels. The Applicant remains committed to |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | exploring ways the local community can benefit from the Scheme, including through its proposed Community Benefit Fund. |
| Concerns that there could be contamination associated with broken glass and cleaning products. | The panels will be cleaned using clean water, with no added chemicals, and therefore will not damage the surrounding environment. This commitment is secured within the **Outline OEMP** (Doc Ref. 7.11 Rev 1). Any broken glass or damaged panels would be managed in line with the recovery, recycling and disposal of waste protocols which will be developed in accordance with those set out in Section 2.9 of the **Outline OEMP** (Doc Ref. 7.11 Rev 1). |
| Concerns that maintenance activities would have impacts on local roads and residences. | During the operational phase, it is anticipated that the Scheme would be manned by a nominal number of staff across the Solar Development Area (10 full time equivalent (FTE) staff), predominantly undertaking maintenance tasks. In addition, there is expected to be approximately 5 visitors per week (equating to 1 per day) for deliveries. As a worst-case scenario, this would generate up to 11 vehicles (22 two-way movements) per day. These may be four-wheel drive vehicles, HGVs or transit vans for maintenance.<br><br>Replacement of infrastructure is expected to generate up to a maximum of 40 HGVs (or 80 two-way HGV movements) per day, and up to 75 staff car trips (150 two-way movements) per day. This is considerably lower than the level of vehicle trips generated during the peak construction phase, equating to approximately 20% of both the HGV and LGV/car movements generated during peak construction of the Solar Development Area and Grid Connection Route. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | As set out within **ES Chapter 15: Traffic and Access** [APP-066], due to the low level of operational traffic to be generated by the Scheme, no significant effects are likely to occur. |
| Concern that the Scheme would be sold to another operator. | The Applicant's approach is to own, develop and manage these projects throughout their full lifecycle, rather than selling to a third-party operator once development consent has been granted.<br><br>Any change in ownership, whether in the UK or from overseas would not alter the requirements placed upon the Applicant through the DCO.<br><br>Matters relating to the nationality of ownership or control of a development are not material planning considerations for the purposes of determining an application for development consent under the PA 2008. The Scheme would be constructed, operated and decommissioned in accordance with UK planning law, the requirements of the DCO, and all relevant regulatory and statutory controls, regardless of ownership structure. |
| Concerns that water use for operational and maintenance activities would have an impact on water security. | The water supply for the office facilities at the On-Site Substation Compounds will either be tankered in or come from the mains supply. Whether it comes from the mains supply or tankered in, grey water will be disposed to a tank emptied by specialist licenced contractor. Up to $3m^3$ of water will be required for every 1000 panels, with an estimated water requirement per year of $3,386m^3$ . This water will be sourced from commercial third party local water suppliers, and not from the main supply or abstracted from a local source. This commitment is secured through the **Outline OEMP** (Doc Ref. 7.11 Rev 1). |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| Concerns that PRoW users will hear a constant hum from electricity network infrastructure. | The potential for noise to affect the amenity and wellbeing of PRoW users has been considered in **ES Chapter 13: Noise and Vibration** [APP-064]. Given their linear nature, ambient noise environment, transient usage, and the range of noise impacts expected, significant effects to the experience, health, and quality of life of users of PRoW as a result of noise emissions from the Scheme are not anticipated. |

## 6.26. Ornithology and Birds

6.26.1. Table 6-26 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Ornithology and Birds including signposting to the relevant sections of the DCO Application.

**Table 6-26: Ornithology and Birds**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern over impacts on birds in general | The impact of the Scheme on wildlife including birds is assessed within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1). The chapter concludes no significant residual adverse effects are expected.<br><br>Potential collision risk impacts have been assessed in the **ES Chapter 9 Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1) and the **ES Appendix 9-14: Habitats Regulations Assessment Report** (HRA) (Doc Ref 6.3 Rev 1), which conclude no significant residual effects with the inclusion of line markers at locations of increased risk.<br><br>As part of the landscape design for the Scheme, new habitats would be provided to increase biodiversity compared to the existing baseline. The Solar Development Area incorporates approximately 174ha of habitat management areas where no physical infrastructure is proposed. Out of this, over 150ha have been specifically set aside for the enhancement of habitats for farmland birds, such as skylark.<br><br>The creation and subsequent management of habitats is set out within the **OLEMP** (Doc Ref. 7.16 Rev 1), included as part of the DCO Application. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| Concern around the impact on the loss of foraging habitat within the Order Limits | The impact of the Scheme on wildlife including bird habitats is assessed within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1). The chapter concludes no significant residual adverse effects are expected.<br><br>As part of the landscape design for the Scheme, new habitats would be provided to increase biodiversity, and therefore foraging habitat, compared to the existing baseline. This would include converting areas of agricultural land around and beneath the solar PV panels into species rich grassland, providing new tree and shrub planting along field boundaries, and enhancing habitats next to watercourses. The Solar Development Area incorporates approximately 174ha of habitat management areas where no physical infrastructure is proposed. Out of this, over 150ha have been specifically set aside for the enhancement of habitats for farmland birds, such as skylark. The creation and subsequent management of habitats is set out within the **Outline Landscape and Ecology Management Plan (OLEMP)** (Doc Ref. 7.16 Rev 1), included as part of the DCO Application. |
| Concern around the loss of breeding sites within the Order Limits | The impact of the Scheme on wildlife including bird habitats is assessed within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1). The chapter concludes no significant residual adverse effects are expected. The Solar Development Area incorporates approximately 174ha of habitat management areas where no physical infrastructure is proposed. Out of this, over 150ha have been specifically set aside for the enhancement of habitats for farmland birds, such as skylark. |
| Concerns on the 'ecological lake effect' | The impact of the Scheme on wildlife including bird habitats is assessed within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1). The ornithological assessment has been undertaken using all best available |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | information and the chapter concludes no significant residual adverse effects are expected. UK research on the effects of the 'ecological lake effect' is limited and resultingly, all bird survey methods (breeding and winter) were discussed and agreed with Natural England throughout the assessment and submission programme. The surveys adhered with the recommendations/requirements of Natural England and are considered a robust assessment of the solar development. |
| Concern on the displacement of birds | The impact of the Scheme on wildlife including bird habitats is assessed within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1). The chapter concludes no significant residual adverse effects are expected. As part of the landscape design for the Scheme, new habitats would be provided to increase biodiversity compared to the existing baseline. The Solar Development Area incorporates approximately 174ha of habitat management areas where no physical infrastructure is proposed. Out of this, over 150ha have been specifically set aside for the enhancement of habitats for farmland birds, such as skylark.<br><br>The creation and subsequent management of habitats is set out within the **OLEMP** (Doc Ref. 7.16 Rev 1), included as part of the DCO Application. |
| Requests for further detail on Skylark mitigation | As set out within the **OLEMP** (Doc Ref. 7.16 Rev 1), this detail will be provided within the Farmland Bird Mitigation Strategy. There will also be operational stage skylark territory surveys completed in Years 1, 2 and 5, with adaptive management secured should targets not be met. |
| Concerns on the accuracy of the bird surveys (in particular skylark and thrush surveys) | The breeding bird surveys recorded in **ES Appendix 9-3: Breeding Bird Survey Report** [APP-206] and Winter bird surveys recorded in **ES Appendix 9-4: Wintering Bird Survey Report 2022-2023** (Doc Ref. 6.3 |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | Rev 1) were undertaken by two experienced field ecologists: an Ecologist with six years of ornithological survey experience; and a Senior Ecologist with 15 years ornithological survey experience. **ES Appendix 9-5 Wintering Bird Survey Report 2023-2024** (Doc Ref. 6.3 Rev 1) and **ES Appendix 9-6 GCC Wintering Bird Survey Report 2023-2024** (Doc Ref. 6.3 Rev 1) were undertaken by a team of ecologists with between 8-18 years ornithological survey experience. The assessments were compiled by a Principal Ecologist and full member of CIEEM, with over 40 years ornithological experience. All surveyors are proficient in bird identification and survey technique. All survey methods requirements and findings have been discussed and agreed with Natural England throughout the lifetime of the submission. |
| Concern over the loss of bird habitats | The impact of the Scheme on wildlife including bird habitats is assessed within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1 Rev 1). The chapter concludes no significant residual adverse effects are expected. As part of the landscape design for the Scheme, new habitats would be provided to increase biodiversity compared to the existing baseline. The Solar Development Area incorporates approximately 174ha of habitat management areas where no physical infrastructure is proposed. Out of this, over 150ha have been specifically set aside for the enhancement of habitats for farmland birds, such as skylark.<br><br>The creation and subsequent management of habitats is set out within the **OLEMP** (Doc Ref. 7.16 Rev 1), included as part of the DCO Application. |

## 6.27. Planning Policy and Need

6.27.1. Table 6-27 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Planning Policy and Need including signposting to the relevant sections of the DCO Application.

**Table 6-27: Planning Policy and Need**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Support for the Scheme. | Noted. The Applicant welcomes the support for the Scheme. |
| General opposition to the Scheme. | Noted. |
| Concerns that the Scheme would industrialise the countryside due to its scale. | The Applicant recognises that the Scheme would introduce new infrastructure into a predominantly rural landscape. The effects have been assessed within **ES Chapter 12: Landscape and Visual** [APP-063].<br><br>The Scheme design has evolved to take into account the proximity of receptors and to reduce the perceived industrialisation of the area. Setbacks are secured within the **Design Parameters** (Doc Ref. 7.4 Rev 2) and the **OLEMP** (Doc Ref. 7.16 Rev 1) to maintain an appropriate distance between the infrastructure and residential receptors. |
| The Scheme does not present any local benefits. | The benefits of the Scheme are presented in Section 4.3 of the **Planning Statement** [APP-260]. The Applicant acknowledges that the greatest benefit of the Scheme, being low carbon infrastructure, may not be felt in the local area. Local benefits of the Scheme could include:<br><br>• Skills and employment generation. The Applicant has submitted the **Outline Skills, Supply Chain and Employment Plan (OSSCEP)** (Doc Ref. 7.17 Rev 1) which sets out potential opportunities for employment and skills, including support for local individuals and businesses to realise the benefits associated with the Scheme. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | • Provision of a new permissive path to connect the PRoW between Queens Bank and Shepeau Stow.<br>• Biodiversity and landscape enhancements.<br>While it does not form part of the DCO Application, the Applicant is committing to a Community Benefit Fund of approximately £500,000 per year of operation of the Scheme (up to £20 million in total assuming a 40-year operational period), should the Scheme gain consent. |
| The benefits of the Scheme would not outweigh the long-term effects on the local community. | The **Planning Statement** [APP-260] presents a balanced view of the Scheme taking into account national and local policy. The Applicant has worked hard to avoid, reduce and mitigate adverse effects through application of the mitigation hierarchy and consideration of good design.<br>The Scheme would provide benefits in addition to its urgent need including the co-located BESS to support load-shifting and smoothing the generation of the grid, a new permissive path, biodiversity net gain, commitments to skills and employment, and allow the land to recover from agricultural use throughout the lifetime of the Scheme.<br>The contribution that the Scheme would make towards the urgent need for low carbon infrastructure is considered to outweigh any of the residual adverse effects. |
| Concerns that approval of the Scheme would inevitably lead to further solar development in the local area. | Should the DCO be granted by the Secretary of State, it would only authorise the development which forms part of the DCO Application.<br>Any future solar development would come forward as a planning application separately, the merits of which would be assessed on a case |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | by case basis. Any future planning applications would be required to take into account the cumulative effects of solar development in the local area, including the Meridian Solar Farm. The Applicant is not aware of any future solar developments proposed in the local area. |
| Protection of agricultural soils, particularly Grades 1 and 2 Fenland soil, should be prioritised over energy needs. | While the Applicant acknowledges the importance of protecting agricultural soils, EN-1 is unequivocal of the need for low carbon energy infrastructure. Paragraph 4.1.7 of EN-1, in relation to CNP Infrastructure, states that "*it is likely that the need case will outweigh the residual effects not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional cases*".<br><br>While paragraph 2.10.21 of EN-3 gives preference to the development of solar PV generation on poor quality land in order to avoid the use of BMV land where possible, it is explicit that "*land type should not be predominating factor in determining the suitability of the site*". The Applicant has set out its consideration of BMV land in accordance with paragraph 5.11.34 of EN-1 within **ES Chapter 3: Alternatives and Design Evolution** [APP-054] and within **Planning Statement Appendix D: Site Selection Report** [APP-264].<br><br>Following identification of land for the Order Limits and detailed soil surveys, the Applicant has sought to prioritise development, particularly that which includes hardstanding, on areas of lower grade land where possible in line with paragraph 2.10.21 of EN-3. It has not been practicable to remove all BMV land from the Order Limits as it would result in fragmentation of the development and reduce the renewable energy generation capability of the Scheme. This is consistent with |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | paragraph 2.10.23 of EN-3 which recognises NSIP scale solar projects are likely to use some agricultural land.<br><br>While the Scheme would result in moderate adverse effects which are significant in relation to the presence of solar infrastructure and hard standing on very high sensitivity agricultural land (i.e. Grades 1 and 2), the Applicant has appropriately balanced the use of this agricultural land with other constraints including flood risk and the presence of heritage assets within the Order Limits. The **Outline SMP** [APP-280] provides measures to mitigate the impact on soil resources, and the land can be returned to agricultural use following the decommissioning of the Scheme. |
| Request that each Solar Development Area be treated as a single project rather than one larger NSIP project. | A development connected through a single grid connection should be treated as a single development for the purposes of determining whether it constitutes an NSIP under the Planning Act 2008. This approach has been affirmed by Planning Inspectorate guidance on other solar schemes, which confirms that, although individual solar sites may not be contiguous, where they share a common grid connection point and their combined generating capacity exceeds the threshold for generating stations set out in Section 15 of the Planning Act 2008, they meet the definition of a single NSIP. |
| View that the reported benefits of the Scheme are speculative or exaggerated. | The representation is not clear as to which benefits are perceived to be speculative or exaggerated. The need for low carbon renewable electricity infrastructure is clearly articulated within EN-1. Where benefits are reported within the Environmental Statement, they have |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | been concluded using a robust methodology as detailed within each respective chapter. |
| Request that the Weston Marsh B Substation should form part of the DCO Application for the Scheme. Queries whether the EIA should also consider this development as the Scheme could not operate without the substation. | The planned Weston Marsh B Substation would be consented and delivered by National Grid Electricity Transmission (NGET). NGET currently intends to secure consent for the substation through its DCO Application for the Grimsby to Walpole project.<br><br>The **Grid Connection Statement** [APP-270] describes the responsibilities for designing and building the grid connection, including that of the Applicant and NGET.<br><br>This is the typical approach for solar development where the point of connection does not yet exist. |
| Views that the UK has overstated the need for renewable energy and climate change, and that the UK's carbon emissions represent a small proportion globally. | The Applicant notes that the urgent need for new renewable energy infrastructure is established through national policy, including the suite of energy National Policy Statements designated by the UK Government.<br><br>These views set out broader concerns regarding climate change policy, which are matters of national policy, and not matters for determination through the examination of this DCO application.<br><br>Determination of the DCO application should focus on whether the Scheme accords with the relevant policy framework and whether its impacts are acceptable rather than revisiting the UK Government's established policy position on the need for renewable energy infrastructure. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| Requests for subsidised energy bills for hosting infrastructure in the local area. | The Scheme is designed to contribute to the wider decarbonisation of the energy system and improve energy security across the county. While it does not offer individual bill reduction, it supports long-term environmental economic benefits, including stabilising energy prices and reducing reliance on fossil fuels. The Applicant remains committed to exploring ways the local community can benefit from the Scheme, including through its proposed Community Benefit Fund. |

## 6.28. PRoW and Recreational Access

6.28.1. Table 6-28 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to PRoW and Recreational Access including signposting to the relevant sections of the DCO Application.

**Table 6-28: PRoW and Recreational Access**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern on the impact on people's ability to walk, exercise and enjoy nature | As confirmed in Section 15.6 of **ES Chapter 15: Traffic and Access** [APP-066] and presented in **ES Figure 15-2: Existing Walking and Cycling Network** [APP-249], there is a range of existing walking, cycling and equestrian routes within and surrounding the Order Limits. Details relating to a proposed permissive path which is an additional enhancement (i.e. not mitigation) to be implemented within the Order Limits during the operational phase are set out within the **Outline Landscape and Ecology Management Plan (OLEMP)** (Doc Ref. 7.16 Rev 1).<br><br>The **Outline PRoW-MP** [AS-026] confirms that there are two temporary PRoW closures likely to be required during construction. PRoW Wstn/3/1 and PRoW Crow/12/1 are anticipated to require temporary closure for 4-6 weeks to facilitate construction works. The original PRoW route would be fully reinstated upon completion of the relevant works. No permanent closures or diversions to PRoW are proposed as part of the Scheme.<br><br>The impact on the Scheme on severance to PRoW is assessed in **ES Chapter 15: Traffic and Access** [APP-066] with residual impacts provided in **ES Appendix 15-2: Traffic and Transport Significance Assessment** [APP-249]. Overall, the effects are not considered to be |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | significant for PRoW users. No effects to the severance of PRoW are anticipated during the operational phase.<br><br>The potential for noise to affect the amenity and wellbeing of PRoW users has been considered in **ES Chapter 13: Noise and Vibration** [APP-064]. Given their linear nature, ambient noise environment, transient usage, and the range of noise impacts expected, significant effects to the experience, health, and quality of life of users of PRoW as a result of noise emissions from the Scheme are not anticipated. |
| Impacts on the views from PROW | Throughout the design process, the Applicant has sought to reduce the potential for effects on views experienced by walkers, and visual amenity has been considered, where possible, on balance with other environmental constraints.<br><br>As part of the Landscape and Visual assessment presented in **ES Chapter 12: Landscape and Visual** [APP-063], a number of viewpoints were assessed which represented views from PRoW. Significant visual effects during construction were concluded for viewpoints in relation to PRoW Crow/7/1 (Viewpoint 3 and Viewpoint 12), PRoW Wstn/6/1 (Viewpoint 30), PRoW Crow/11/1 (Viewpoint LCC 3) and PRoW Wstn/3/1 (Viewpoint LCC10). During operation (both Year 1 and Year 15), significant visual effects were identified for PRoW Crow/7/1 (Viewpoint 3), PRoW Crow/12/1 (Viewpoint 10), PRoW Wstn/6/1 (Viewpoint 30), Crow/11/1 (Viewpoint LCC 3) and PRoW Wstn/3/1 (Viewpoint LCC 10). Although significant visual effects have been identified from these viewpoints, these effects would not adversely affect people's ability to use the Public Rights of Way (PRoW) for |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | walking, exercise, or enjoyment of the natural environment. This is because users would experience the views on a temporary and short-term basis while moving through the landscape, rather than as static receptors. |
| Concern that PRoW will be lost | No permanent closures or diversions to PRoW are proposed as part of the Scheme. The **Outline PRoW-MP** [AS-026] confirms that there are two temporary PRoW closures likely to be required during construction. PRoW Wstn/3/1 and PRoW Crow/12/1 are anticipated to require temporary closure for 4-6 weeks to facilitate construction works. The original PRoW routes would be fully reinstated upon completion of the relevant works.<br><br>As stated in **ES Chapter 2: The Scheme** [AS-017], a permissive path will be provided connecting PRoW between Queens Bank and Shepeau Stow, following the boundary of the Settlement W of Cate's Cove Corner Scheduled Monument. The permissive path will be located within a corridor that measures approximately 20m in width. The permissive path will be suitable for pedestrians, cyclists and horse riders and provide information boards on the historic and natural environment. The permissive path would provide increased public access across the landscape and, thus, responds positively to local planning policies relating to rural access and recreational amenity. |

## 6.29. Scheme Description and Design

6.29.1. Table 6-29 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to the Scheme Description and Design including signposting to the relevant sections of the DCO Application.

**Table 6-29: Scheme Description and Design**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| The use of piled foundations for the construction of Solar Panels and the permanent impact on the land | Module mounting structures would either be mounted via galvanised steel poles driven into the ground, or on 'feet' supported on concrete footings which will be used where steel poles cannot be used (such as adjacent to existing infrastructure). Further information can be found within the **Design Parameters** (Doc Ref. 7.4 Rev 2) on page 3 and 4. Concrete ballast foundations as an alternative would only be used in areas where Identified during the detailed design phase. During the decommissioning works for the foundations, the piles would be removed, as would any concrete ballast foundations. A full description can be found in **ES Chapter 2 The Scheme [AS-017],** discussed in paragraph 2.121. |
| The use of overhead line for the Grid Connection Route over underground cabling | The Scheme has been developed in line with NPS EN 5 (2025), a framework to aid the planning and decision-making process. NPS EN-5 states a strong starting presumption in favour of overhead lines when designing new electricity transmission infrastructure (2.9.21), noting this should be reversed in favour of underground cabling in nationally designated landscapes. Please refer to 7.3 Design Approach Document, 6.2.10, for the reasoning behind the Project adopting an overhead line approach over an Underground alternative. The Applicant has designed the Scheme's Grid Connection Route in line with the applicable planning policy framework. |

## 6.30. Socio-Economics and Land Use

6.30.1. Table 6-30 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Socio-economics and Land Use including signposting to the relevant sections of the DCO Application.

**Table 6-30: Socio-Economics and Land Use**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| Concern about the impact on the leisure industry | **Chapter 14: Socio-economics and Land Use** [APP-065] assesses the likely effects on specific local receptors relevant to the leisure industry, including visitor attractions, open spaces, businesses, and community facilities. The assessment considers direct land-take effects and indirect severance effects of the Scheme. Overall, no significant effects relating to land-take and severance are likely to occur on receptors that contribute to the leisure industry.<br><br>It is acknowledged that impacts relating to local amenity may also result in impacts on the local leisure industry. Amenity impacts have been considered in **ES Chapter 10: Human Health** [APP-061] through health determinants such as noise and vibration; air quality, odour and dust; landscape and visual effects; and traffic and access, drawing on assessments presented in relevant ES chapters including **ES Chapter 13: Noise and Vibration** [APP-064], **ES Chapter 6: Air Quality** [APP-057], **ES Chapter 12: Landscape and Visual** [APP-063] and **ES Chapter 15: Traffic and Access** [APP-066]. The noise and vibration, air quality, and traffic and access assessments of relevance to local amenity conclude that there would be no likely significant effects on any receptors across the study area.<br><br>The landscape and visual assessment identifies significant effects on local receptors. However, these effects on landscape character and |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | visual amenity, while perceptible, will reduce over time as mitigation within the **Outline Landscape and Ecology Management Plan** (Doc Ref. 7.16 Rev 1) establishes. In any event, their limited nature, extent and duration mean they are not of a scale, frequency or magnitude likely to cause significant adverse effects on the leisure industry as a whole. |
| Concern about the impact on the local economy and local businesses in general | The potential impacts and likely significant effects of the Scheme on the local economy and businesses have been assessed within **ES Chapter 14: Socio-economics and Land Use** [APP-065]. This assessment includes the likely employment and GVA generation, effects on local visitor accommodation capacity, as well as any direct effects on individual local businesses as a result of the Scheme. The chapter concludes that the Scheme would not give rise to any significant adverse effects on either the local economy or any individual businesses.<br><br>In addition, the **Outline Skills, Supply Chain and Employment Plan** (Doc Ref. 7.17 Rev 1) sets out a variety of measures which the Applicant would seek to implement to maximise the socio-economic benefits of the Scheme, for example promoting local employment, apprenticeships and education. |
| Concern about potential job losses in the food industry due to the Scheme | **ES Chapter 14: Socio-Economics and Land Use** [APP-065] assesses the likely effects on agricultural employment and concludes that there would be no loss of agricultural employment arising from the construction and operation of the Scheme. The agricultural land within the proposed Solar Development Area would continue to generate income for the landowners, and as the land is not farmed by tenants, |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | would not result in any loss of jobs. There may be some contractors who undertake some farming activities on the land, but it is very likely that such contractors would not be entirely reliant on these farms for employment. Areas of agricultural land within the Grid Connection Route and Inter-Array Connections would experience minimal permanent land take which would be limited to the bases of overhead pylons and would consequently not have their current agricultural activities altered enough to result in the loss of agricultural employment.<br><br>Given the conclusion that no loss of agricultural employment is anticipated, and that the majority of affected landowners within the Grid Connection Route and Inter-Array Connections would not experience any substantial change to their farming activities, it is considered reasonable to conclude that the Scheme would not have a significant effect on regional food production and employment within the food production industry. |
| Concern that the scheme does not deliver enough economic development and employment opportunities | The Applicant's approach to supporting local employment opportunities is summarised within the **Outline Skills, Supply Chain and Employment Plan** (Doc Ref. 7.17 Rev 1), which provides a framework for maximising local employment and upskilling local residents. Further details of the approaches and commitments to securing these local benefits will be laid out within a full Skills, Supply Chain, and Employment Plan, which will be developed prior to construction if the Scheme is granted development consent. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | Separate to the ES, 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, but initiatives may focus on promoting economic development. |
| Concern that the removal of agricultural land from food production has not been factored in to the assessment of impacts on South Holland's local economy. | **ES Chapter 14: Socio-Economics and Land Use** [APP-065] assesses the likely effects of the Scheme on agricultural land holdings. The land required for the Solar Development Area would be subject to voluntary, temporary land take from co-operating relevant landowners, noting that 180ha of land within the Solar Development Area would be retained for agricultural use, including arable land and pasture, and that in addition, some limited agricultural use (such as sheep grazing) may be possible within the areas to be used for PV panels. Areas of agricultural land within the Grid Connection Route and Inter-Array Connections would experience minimal permanent land take which would be limited to the bases of overhead pylons and would consequently not have their current agricultural activities altered enough to result in substantial changes in food production capability. As such, the long-term impact on local food production capability of agricultural land relevant to the Scheme, and any resultant effect on the local economy in South Holland, is likely to be limited and not significant. |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| Concerns about businesses being impacted by the Scheme | The potential impacts and likely significant effects of the Scheme on specific businesses have been assessed within **ES Chapter 14: Socio-economics and Land Use** [APP-065]. The assessment considers direct impacts on businesses through land take, as well as indirect impact through severance.<br><br>Given that no businesses are situated within the Order Limits, and no significant severance effects on local roads and junctions are identified within **ES Chapter 15: Traffic and Access** [APP-066], the assessment concludes that no businesses would experience significant effects as a result of construction, operation, or decommissioning of the Scheme. Areas of agricultural land within the Grid Connection Route and Inter-Array Connections would experience minimal permanent land take which would be limited to the bases of overhead pylons, and so impacts on the operations of existing farming businesses would be very limited. |

## 6.31. Traffic and Access

6.31.1. Table 6-31 below sets out the Applicant's response to the issues raised within the Relevant Representation relating to Traffic and Access including signposting to the relevant sections of the DCO Application.

**Table 6-31: Traffic and Access**

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| Concern that road conditions are not suitable for heavy traffic volumes. | The **Outline Construction Traffic Management Plan (OCTMP)** [APP-278] and (Doc Ref. 7.13 Rev 1) provides further information on the proposed construction traffic management during the construction phase. Appropriate routing of vehicles and Heavy Goods Vehicles (HGVs) will be adopted to minimise the impact on more sensitive and rural roads. This approach was discussed and agreed with the Local Highways Authorities (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 **OCTMP** [APP-278] & (Doc Ref. 7.13 Rev 1), 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. |
| Concern that residents will be delayed by the increased construction traffic | **ES Chapter 15: Traffic and Access** [APP-066] assesses the potential impact and likely significant effect of the Scheme on traffic levels during construction. The assessment concludes that no significant effects on driver delay are expected with the implementation of mitigation |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| | measures included within the **OCTMP** [APP-278] & (Doc Ref. 7.13 Rev 1), e.g. restricted working hours and delivery timescales ensuring that construction traffic avoids peak hours. |
| Concern that pedestrians and cyclists will experience increased collision risk from the construction traffic | **ES Chapter 15: Traffic and Access** [APP-066] considers road safety for road users and pedestrians and concludes no significant effects. Measures have been implemented to control traffic, including a default priority that construction traffic will give-way to other users. This includes several Public Rights of Way (PRoW) crossing points, as detailed within the **Outline PRoW-MP** [AS-026]. Further details on how roads will be managed to mitigate impacts on non-motorised users such as pedestrians and cyclists are set out in the **OCTMP** [APP-278] & (Doc Ref. 7.13 Rev 1).<br><br>**ES Chapter 10: Human Health** [APP-061] also assesses the safety of the Scheme on pedestrians, cyclists, and equestrian receptors. No significant adverse effects have been identified, with the implementation of the aforementioned management plans. |
| Concern about road safety | The Applicant confirms that **ES Chapter 15: Traffic and Access** [APP-066] considers road safety for both vehicle drivers and non-motorised users and concluded no significant effects. Measures will be implemented to control traffic, including a default priority that construction traffic will give-way to other users. This includes several Public Rights of Way (PRoW) crossing points, as detailed within the **Outline PRoW-MP** [AS-026]. Further details on how roads will be managed to mitigate impacts is set out in the **OCTMP** [APP-278] & (Doc Ref. 7.13 Rev 1). |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | **ES Chapter 10: Human Health** [APP-061] also assesses the safety of the Scheme on pedestrians, cyclists, and equestrian receptors and concludes that no significant effects are expected , with the implementation of the mitigation measures set out within the management plans referred to above.<br><br>The full assessment of road safety, including receptors considered, is set out in **ES Appendix 15-4: Transport Assessment Note** [APP-251]. |
| Concerned about road closures | The Applicant acknowledges that temporary partial or full road closures may be required in some locations to complete highway works associated with the Scheme, such as the construction of new access points, improvements to existing accesses and the installation of the cable where it crosses existing roads. Any partial or full road closures are expected to be for a short duration to minimise impacts on the local highway network. Advance warning will be provided in line with local highway authority guidance and diversion routes will be put in place. No permanent road closures will be required. Management measures will be set out in the Detailed Construction Traffic Management Plans (CTMPs), to be agreed with the Local Planning Authority, in substantial accordance with the **OCTMP** [APP-278] & (Doc Ref. 7.13 Rev 1).<br><br>Where a full closure is required, the works will be carefully planned to ensure that the durations of any closures are minimised, and any full closure will include consideration of the continued access of any local residents or commercial businesses that fall within the area of the closure. The exact duration of any partial or full closure would be secured as part of the Detailed CTMP(s). |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
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| Concerns about operational traffic | During the operational phase, it is anticipated that the Scheme would be manned by a nominal number of staff across the Solar Development Area (10 full time equivalent (FTE) staff), predominantly undertaking maintenance tasks. In addition, there is expected to be approximately 5 visitors per week (equating to 1 per day) for deliveries. As a worst-case scenario, this would generate up to 11 vehicles (22 two-way movements) per day. These may be four-wheel drive vehicles, HGVs or transit vans for maintenance. Refer to Section 2.5 of the Outline Operational Environmental Management Plan [APP-276] for further details on the replacement schedule.<br><br>As set out within **ES Chapter 15: Traffic and Access** [APP-066], due to the low level of operational traffic to be generated by the Scheme, no significant effects are likely to occur. |
| Concerns that new accesses will destroy habitat | For accesses, existing hedgerow gaps have been used wherever possible in the design and layout of the construction and maintenance accesses. Whilst some hedgerow loss will occur, such as at visibility splays, this will be fully compensated for by new planting and the enhancement of existing hedgerows. The Landscape and Ecology Strategy is set out in and secured by the **Outline Landscape and Ecology Management Plan** (Doc Ref. 7.16 Rev 1). |
| Concern that vehicles will not fit down the proposed construction route | The proposed construction traffic routes and accesses are set out within the **OCTMP** [APP-278] & (Doc Rev. 7.13 Rev 1). The Applicant has completed detailed vehicle tracking, swept path analysis for HGV's and Abnormal Indivisible Loads (AIL's), and an access appraisal to identify |

| Summary of the Issues Raised in the Relevant Representations | Applicant's Response |
|---|---|
| | suitable construction traffic routes and accesses to the land parcels and Grid Connection Route. The proposed construction traffic routes and accesses are further set out within the **OCTMP** [APP-278] & (Doc Ref. 7.13 Rev 1). |